



PHOTOGRAPH: JOHN MUIR TRUST

# A fine balance

**Although imperfect, the Wild Land Areas map that is incorporated into Scottish Planning Policy could yet evolve to become far more than just a policy planning tool.**

**Rosie Simpson explains**

**AS A** wild places charity with a remit to protect wild places in the UK, and operating at a time of climate emergency, we are aware of treading a fine line between challenging individual renewable energy development applications if unsuitably located, while also being broadly supportive of wind energy – a form of electricity generation that has already played an important role in decarbonising Scotland's power sector.

The perceived polarisation is reflected in views of our members. Some have written to say that wind turbines have aided their enjoyment of the wild; the tracks help them access the hills by eBike or on cross country skis, while the motion and sound of the blades also bring a certain pleasure. For them, wind turbines are symbols of a

new world of clean energy abundance rather than out-of-place industrial developments.

Others, however, are alarmed at the rate of expansion of onshore wind turbines across the country, or in particular regions. Those members wonder what the overall plan is. How many more turbines are needed? And where will all the additional infrastructure go?

## **WATERSHED MOMENT**

In Scotland, the adoption of 42 mapped areas of wild land – the Wild Land Areas map (see opposite) – into Scottish Planning Policy in 2014 was a watershed moment in protecting these places from onshore wind energy development. The current National Planning Framework 3 (NPF3) refers to

wild land as 'nationally important', while current Scottish Planning Policy (SPP2) mentions Wild Land Areas as being 'nationally important mapped assets' in which 'wind farms may be appropriate in some circumstances.'

There is no equivalent mapping of Wild Land Areas in England, Wales or Northern Ireland but, as planning is a devolved matter, we can expect the UK countries to have different policy approaches to onshore wind.

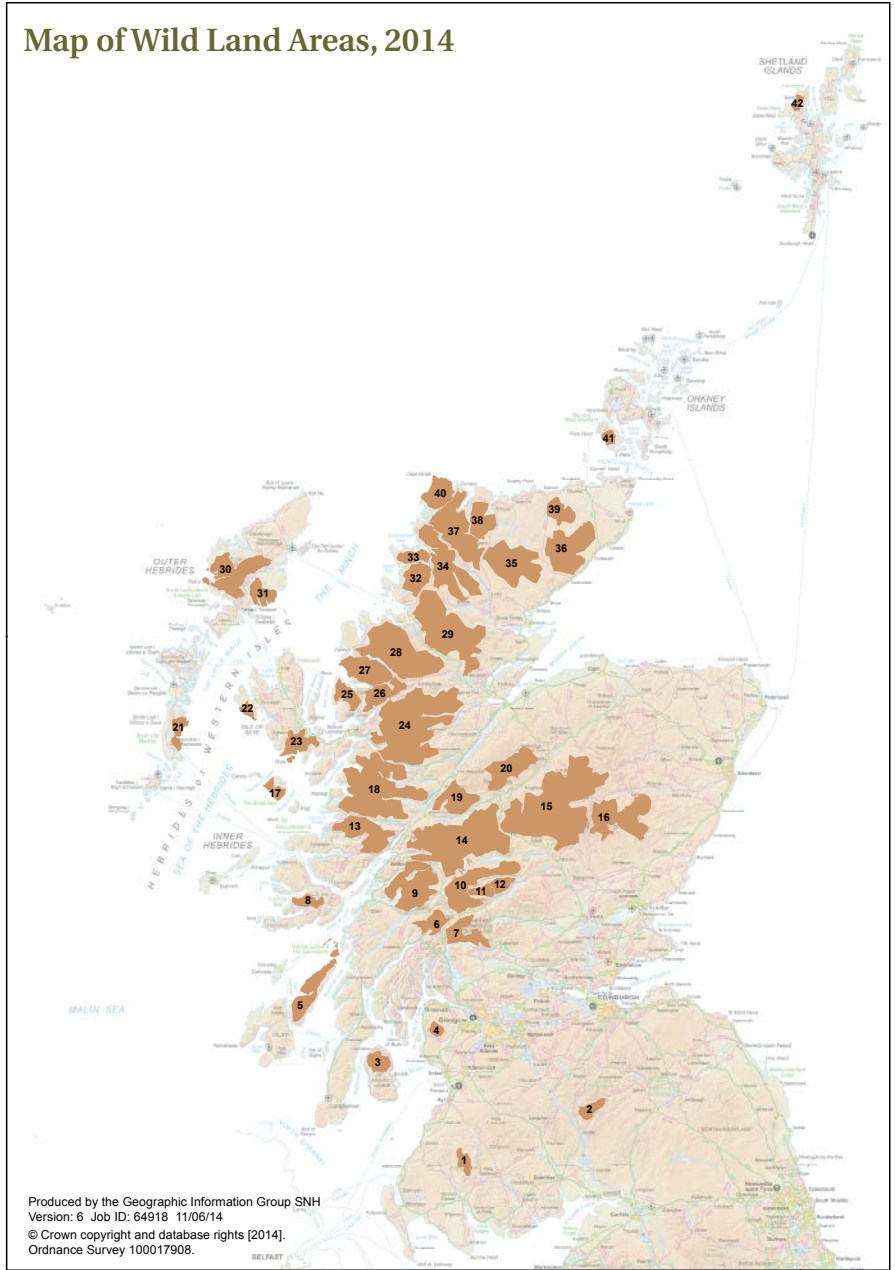
In Scotland, the approach adopted in 2014 evolved from past planning policy and consultation led by Scottish Natural Heritage (now NatureScot), with the eventual mapped areas representing the 'most extensive areas of high wildness' in Scotland.

In its note of advice to the Scottish Government in June 2014, Scottish Natural Heritage acknowledged that while the Core Areas of Wild Land map consultation had not been perfect, it had nonetheless received support from 73 per cent of respondents. This provided the evidence it needed to

**KEY TO MAP**

01 Merrick	23 Cuillin
02 Talla-Hart fell	24 Central Highlands
03 North Arran	25 Applecross
04 Waterhead Moor – Muirshiel	26 Coulin & Ledgowan Forest
05 Jura, Scarba, Lunga and Garvellachs	27 Flowerdale – Sheildaig – Torridon
06 Ben Lui	28 Fisherfield – Letterewe – Fannichs
07 Ben More – Ben Ledi	29 Rhiddoroch – Beinn Dearg – Ben Wyvis
08 Ben More, Mull	30 Harris – Uig hills
09 Loch Etive mountains	31 Eisgein
10 Breadalbane – Schiehallion	32 Inverpolly – Glencanisp
11 Lyon – Lochay	33 Quinag
12 Ben Lawers	34 Reay – Casley
13 Moidart – Ardgour	35 Ben Klibreck – Armine Forest
14 Rannoch – Nevis – Mamores – Alder	36 Causeymire – Knockfin Flows
15 Cairngorms	37 Foinaven – Ben Hee
16 Lochnagar – Mount Keen	38 Ben Hope – Ben Loyal
17 Rum	39 East Halladale Flows
18 Kinlochhourn – Knoydart – Morar	40 Cape Wrath
19 Braeroy – Glenshirra – Creag Meagaidh	41 Hoy
20 Monadhlaith	42 Ronas Hill & North Roe
21 South Uist hills	
22 Duirinish	

**Map of Wild Land Areas, 2014**



support the inclusion of a Wild Land Areas map in Scottish Planning Policy. At the time, the Trust was also supportive of the map and participated in the consultations.

Following the map’s publication, 42 Wild Land Area descriptions were published with the aim of helping broaden an understanding and appreciation of the areas. Draft guidance for developers on “Assessing impacts on Wild Land Areas” was also published in 2017 (although not formally approved until 2020). Since inclusion of the map in Scottish Planning Policy, developers have applied the guidance, evaluating whether a Wild Land Impact Assessment is needed at scoping stage, and subsequently assessing impacts where needed.

Similarly, local authorities and Scottish Ministers have used the assessments on impacts to help them determine the outcomes of individual energy development applications.

From the start, the policy intention

for including Wild Land Areas has been clear: Scottish Government intended to provide decision-makers with a backstop to protect these areas, on a case-by-case basis, from large-scale onshore wind farms. And given that only one large-scale onshore wind farm has been constructed in a Wild Land Area (Creag Riabhach in Fionaven-Ben Hee) since the adoption of Wild Land Areas into planning policy, it can be argued that this policy intention has been fulfilled.

**DIFFERENT VIEWS**

However, much has changed since 2014 and it is worth reflecting on the mapping approach from other perspectives. From days of empire,

leaders of nations have drawn lines on maps. These have served different purposes but have often created a sense of division. There is the theoretical division (you are on one side of the line or the other) and the cultural division (who decides where to place the line and according to what values or criteria?).

There is also potential for creating fresh division in communities, with lines on maps used to direct future decisions and resources according to where those lines have been drawn. Overall, they can be rather blunt instruments, at odds with both a rapidly changing world and the reality that nature is no respecter of digital or paper boundaries.



Wind turbines at Stronelairg (previous page); Strathaird Farm, close to Wild Land Area 23; swimming in the shadow of Bla Bheinn

PHOTOGRAPH: DAVID BALHARRY

In Scotland, such maps have appeared to some as cultural appropriation – an insensitive marking out of ‘what is wild’ when what is wild was once understood and interpreted by families and communities living in these places. Does it matter, for example, that there is a lack of Gaelic interpretation of the Wild Land Areas? And is that at odds with the many Gaelic place names for landscape features within these areas?

People make sense of areas through geographical identity, through their own language, familiar place names and experiences. The maps, in this respect, have not necessarily captured what is meaningful to local communities living near the mapped wild places. Instead, they are a planning tool which, depending on where you live and your viewpoint (in both senses of the word), can direct resources, development and job opportunities away from or towards your region.

### TRUST MANIFESTO

In our Manifesto for the Holyrood 2021 elections, the Trust asked for ‘a strategy for Scotland’s Wild Land Areas with the aim of realising their environmental, ecological, educational, health and economic potential’. The intention was to create room for a conversation around Wild Land Areas being much more than just a planning policy tool.

Existing community land-owning and partnership models suggest this is possible. The Yearn Stane Project within the Waterhead Moor-Muirshiel Wild Land Area, the Coigach-Assynt Living Landscape Partnership in the



PHOTOGRAPH: DAVID BALHARRY

**“We are for wild places, and we are also for ending the destructive burning of fossil fuels”**

Inverpolly-Glencanisp and Quinag Wild Land Areas and The Nevis Landscape Partnership in the Rannoch-Nevis-Mamores-Alder Wild Land Area are all strong examples.

Of course, there is every chance that a different land use pattern will emerge in the coming years driven by global and UK energy companies, already heavily invested in onshore wind, to achieve their own targets to double onshore wind energy capacity in Scotland by 2030.

The Trust’s own perspective is clear: we are for wild places, and we are also for ending the destructive burning of fossil fuels as soon as possible. And as the Wild Land Areas provide the most accurate representation of some of the best of Scotland’s wild places, we will

ask for some qualified level of protection for them to be retained within the forthcoming National Planning Framework (NPF4) – a draft of which the Scottish Government is expected to consult on this autumn.

We intend this not as a block on energy development – after all, some development may be appropriate in these areas – but as a safeguard for ecological restoration; for the land to be managed as a natural carbon sink; and as part of a wider vision for Scotland’s uplands to be managed by people and local communities.

And while we embraced Wild Land Areas as a way to protect wild places in Scotland from development, we are aware there are many wild places that are excluded from the map – places that register meaningfully with people who don’t necessarily identify with the mapped images or descriptions of vast upland landscapes of bog, heather and moor. As such, we are now looking ahead, beyond the Wild Land Areas map, to mapping wild places around the UK to a different set of criteria and in a way that includes as many people as possible.

When we next look at the draft NPF4, we will scrutinise the wording itself. And we urge you all to get involved by similarly scrutinising the draft text and having a say on what role the Wild Land Areas map should have in determining the future course of land use in Scotland. □

#### *About the author*

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