



NATIONAL PLANNING FRAMEWORK 4

SUBMISSION TO CALL FOR IDEAS

Summary

The National Planning Framework 4 should include the designation of more National Parks as one of its National Developments.

Scotland's Rural Landscapes

The rural landscapes of Scotland are one of our greatest environmental, social and economic assets. They have a central role to play in tackling the climate emergency and the biodiversity crisis, and are of vital importance in supporting the cultural heritage and identity of Scotland, its socio-economic well-being and the mental and physical health and welfare of its people. The success of our largest industry, tourism, largely depends on the health of our natural and cultural landscapes, but they also have great significance as the valued settings for the everyday lives of many local people. NPF4 should therefore give explicit support to the better protection and management of all our rural landscapes, including not only those designated as protected landscapes but also the wider countryside.

As a minimum the following excellent wording from NPF3 should be retained in full:

Scotland's landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making. National Scenic Areas and National Parks attract many visitors and reinforce our international image. We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset. Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being.

Land Use Strategy and NPF4

The character of Scotland's rural landscapes is only partly influenced by those built developments subject to the statutory town and planning system; significant change can result from land uses not controlled by that system, particularly agricultural and forestry developments. The policies and spatial guidance enshrined in the new NPF4 should therefore sit explicitly within the overall framework provided by the Land Use Strategy (LUS), and the Scottish Government must provide a clear explanation of the precise relationships between the LUS, NPF4 and their emerging respective regional implementation mechanisms, ie Regional Land Use Frameworks and Regional Spatial Strategies.

There is a risk that widespread confusion could result from this new plethora of national, regional and local frameworks and strategies. On the other hand, there is currently a great opportunity for the LUS and NPF4 to pull together in an integrated fashion to

jointly and successfully address national priorities including the climate emergency and biodiversity crisis. Such a joint approach could for example promote the multiple climate, landscape and quality of life benefits which would accrue from substantial increases in woodland planting of native species in towns, cities and farmland, rather than a return to upland conifer monocultures as a simplistic method of seeking additional carbon sequestration.

National Parks

Scotland's landscapes rank amongst the best in the world in their richness, quality and diversity. We have wild mountains, pristine rivers and lochs, ancient forests and stunning coastline and islands, all rich in wildlife and history and internationally renowned for their beauty. Our landscapes enhance our quality of life, well-being and physical and mental health. They give us inspiration, refreshment and enjoyment. They provide great opportunities for outdoor recreation, including walking, cycling, canoeing and mountaineering. They are one of the main reasons why people visit Scotland, so they support important economic benefits through tourism, our largest industry.

National Parks are the principal mechanism used across the world to safeguard and manage such fine landscapes according to international best practice. Designating a fine landscape as a National Park is the best way to:

- generate a high profile
- support its active management as well as its protection
- encourage integrated planning and management by all public bodies, and
- invest additional national resources in helping residents and visitors both to enjoy the landscape and conserve it for future generations

SCNP has been campaigning for more National Parks for over a decade, jointly with The Association for the Protection of Rural Scotland (APRS). Our full case is set out in our 2013 report *Unfinished Business*, and we have published a series of topic reports on more detailed aspects of the case for more National Parks, including socio-economic benefits, governance models, tourism and volunteering. All of these are available on our website www.scnp.org.uk.

Scotland's first two National Parks have proven the value of the designation and achieved much for their areas, including repairing mountain paths, building cycle routes, conserving native woodlands, supporting local businesses, generating jobs for young people, providing affordable housing, investing in sustainable rural development and growing the tourism industry – whilst protecting the landscapes which visitors come to see. They are playing a leading role in tackling the climate emergency and biodiversity crisis, and run extensive education programmes which benefit many young people. More National Parks would spread these approaches and benefits to more areas which richly deserve them. However, there is also potential for further improvements in the management, operations and funding of the two existing National Parks if they are to achieve their full potential as exemplars of sustainable development.

Lively local campaigns are under way in the Borders and Galloway for National Parks to be designated in their areas. In a debate on 31 October 2019 to mark the centenary of the 1919 Forestry Act, Members of the Scottish Parliament unanimously agreed to an amendment recognising the contribution made by National Parks, including the following wording: "the Parliament ... believes that new national parks should be designated."

The Scottish Government's own recently-published Environment Strategy¹ clearly stresses the significance of National Parks to its active lifestyle and health agenda:

The link between nature, an active lifestyle and health is well understood. Scotland's National Parks are delivering on this agenda by supporting high quality walking and cycling infrastructure; and by getting people active through green health partnerships, health walks, outreach and volunteer programmes. The incredible wildlife and landscapes of the National Parks are key to many of the health benefits.

The designation of more National Parks would clearly deliver even more of these nationally important health benefits. Given the severe impacts which the current pandemic is likely to have on the rural economy, especially in remoter areas heavily dependent on tourism, the designation of more National Parks should be seen as a key element in a medium-term recovery strategy.

We therefore propose that NPF4 should include as a National Development the designation of a number of new National Parks, including Galloway and the Borders, over a number of years. This would bring additional resources and significant social and economic benefits to places which richly deserve them, strengthen Scotland's international standing for environmental protection and support our crucial tourism industry.

National Scenic Areas

Some of Scotland's finest rural landscapes were designated in 1980 as National Scenic Areas (NSAs), representing "areas of outstanding scenic value in a national context". They include parts of iconic islands such as Hoy, Jura and Rum, spectacular mountains such as the Cuillin of Skye and Ben Nevis and some of our finest lowland landscapes such as Upper Tweeddale and the East Stewartry Coast. The suite of 40 NSAs showcase some of the best examples of the types of landscape for which Scotland is famous across the world. They possess huge potential to maximise the benefits of protecting and enhancing those landscapes for local residents, visitors and future generations, and to contribute to current national priorities such as the climate emergency, biodiversity crisis, tackling obesity and promoting mental health.

Since the NSAs were designated government, its agencies and non-government organisations have striven to raise their profile and to improve their management. In 1997 the then Scottish Office asked Scottish Natural Heritage (SNH) to review the NSA designation with a view to making it more effective, to consider whether the present series of 40 areas should be expanded and to advise on the relationship between NSAs and other relevant designations. Following widespread consultation SNH published its *Advice to Government* in 1999. This advice included:

- placing a new duty on local authorities to produce, implement and review a Management Strategy for each NSA
- involving local communities and other interests in the preparation and implementation of these Management Strategies
- providing additional resources to support the development and implementation of Management Strategies
- revising land management support schemes to contribute to NSA objectives
- seeking greater effort to increase awareness and understanding for NSAs amongst local communities and general public

Dumfries and Galloway Council has prepared exemplary Management Strategies for the three NSAs in its area, identifying their special qualities and setting out proposals to

¹ The Environment Strategy for Scotland: Vision and Outcomes
Scottish Government, February 2020

protect and enhance these qualities. It has also introduced a range of innovative and successful art and community projects to emphasise the value of the NSAs to the local communities. This approach has generated demonstrable environmental, social and economic benefits for these NSAs. In addition, four NSAs have subsequently been incorporated into Scotland's two National Parks: The Cairngorm Mountains NSA and Deeside and Lochnagar NSA within the Cairngorms National Park; and Loch Lomond NSA and The Trossachs NSA within the Loch Lomond and The Trossachs National Park. These four NSAs therefore also benefit from some degree of management planning by being within the two National Park Plans.

However, despite regular encouragement from the Scottish Government and SNH, no other local authority has followed suit for the remaining 33 NSAs. The result is that most NSAs remain generally little known, woefully publicised and poorly managed. One consequence of this failure is that IUCN (the World Conservation Union) has recently decided that NSAs no longer merit the Category V Protected Landscape status they previously enjoyed in its global Protected Area catalogue. There has been some progress: in 2010 SNH prepared and published its excellent *Special Qualities of National Scenic Areas* report, setting out in detail the special qualities of each NSA which merit their designation and protection. In the absence of proper Management Strategies, SNH has since worked up short Management Statements jointly with local authorities and NGOs.

NSAs are designated under Section 263A of the Town and Country Planning (Scotland) Act 1997, and are protected from wind farm development by paragraph 3.23 of National Planning Framework 3 (2014) and by Table 1 of Scottish Planning Policy (2014). However, their ability to influence development management in the areas they cover still rests on the text of a 1987 Circular issued by the former Scottish Development Department. We therefore propose that this outdated mechanism should be thoroughly revised and updated and incorporated into NPF4. We further propose that NPF4 should include as a National Development the preparation of Management Strategies for the remaining 33 NSAs in order to promote their protection, better management and enhancement.

Regional Parks

Scotland's three Regional Parks were established during the 1980s, to provide substantial areas for informal outdoor recreation within easy reach of the large populations of the Central Belt, as part of a comprehensive approach to public access to the countryside. They were originally managed by the former Regional Councils, with substantial national funding provided by the former Countryside Commission for Scotland enabling the employment of countryside rangers and provision of essential infrastructure. However, since their establishment this national funding has been withdrawn and their former regional champions abolished. This has transferred the entire burden of funding the Regional Parks onto hard-pressed local authorities, resulting in reduced budgets and staffing. A large and increasing backlog of maintenance work has built up on the recreational infrastructure and staff have been forced to abandon all but essential tasks.

This decline has become so severe that in 2014 the UK Committee of IUCN (the World Conservation Union) recommended that the Regional Parks should be removed from the international list of Category V Protected Landscapes, due to a lack of emphasis on nature conservation and biodiversity policies and actions. However, their original objectives of encouraging healthy outdoor recreation and landscape conservation are even more valid today than they were 40 years ago, and they also have great potential to help address current issues of obesity, mental health, biodiversity loss and the climate emergency. Scotland's Regional Parks should therefore be relaunched with refreshed objectives supported by new national funding, and the creation of new

Regional Parks should be seriously considered, for example in the Ochil or Kilpatrick Hills. Taken together this initiative could comprise a highly suitable National Development for NPF4, ideally in close collaboration with the Central Scotland Green Network.

SCNP and APRS carried out a comprehensive review of Scotland's Regional Parks in 2018/19 and this is attached to this submission. It sets out in more detail the rationale behind the above argument.

Local Landscape Areas

Although National Parks and National Scenic Areas cover many of those of Scotland's landscapes which are famous across the world, many of the landscapes most valued by local people in rural Scotland are designated as Local Landscape Areas or Special Landscape Areas. These should also be given strong protection from damaging development in NPF4, at the very least by retaining the current SPP wording which defines their purposes as to:

- safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or
- promote understanding and awareness of the distinctive character and special qualities of local landscapes; or
- safeguard and promote important local settings for outdoor recreation and tourism.

Nature Network

SCNP supports the development of a national Nature Network across Scotland, comprising a strategic, long-term approach to manage, connect, restore and enhance Scotland's habitats and landscapes. It would link together the existing and future National Parks, National Scenic Areas, Regional Parks and other protected areas through a network of landscape and wildlife corridors. Full details of this proposal are available in Scottish Environment LINK's [Nature Network Briefing](#).

About SCNP

SCNP promotes the protection, enhancement and enjoyment of National Parks, potential National Parks and other nationally outstanding areas worthy of special protection.

Further Information

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