



APRS
The Association for the
Protection of Rural Scotland

NATIONAL PLANNING FRAMEWORK 4 SUBMISSION TO CALL FOR IDEAS

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. Rural land is also an essential source of food and timber production, supporting jobs in rural communities. 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 address national priorities jointly and successfully, 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 the planting of predominantly native tree species in towns and cities and on farmland, rather than relying predominantly on upland conifer afforestation as the

principal means to additional carbon sequestration. Much of Scotland's farmed countryside would, for example, benefit greatly from more hedgerow trees and shelter belts, which are sadly lacking in many areas and, where present, are often nearing the end of their life. Not only would these enhance the land's visual appeal, but they would also provide shade and shelter for livestock and reduce the danger of soil erosion.

Green Belts

Scotland's eleven Green Belts are a precious resource of national importance. They protect and enhance the landscape setting of the towns and cities they surround and penetrate, and help to direct growth into appropriate locations within settlements. Green Belts provide many important benefits to the quality of life and well-being of society in addition to their planning purposes. They often include important designations for the protection of landscape, nature conservation, informal outdoor recreation and cultural heritage.

Green Belts already contribute to climate mitigation through carbon storage in soils and woodlands. However, they also have great potential to do much more to address the Climate Emergency and biodiversity crisis and to promote physical and mental well-being through healthy outdoor exercise. They contain significant areas of prime agricultural land, important for home-grown food production, and of semi-natural woodland, valuable for carbon storage. All Scotland's rural landscapes provide benefits to people's mental and physical health, but Green Belts are particularly significant in this regard, as many of them provide access to the countryside for Scotland's most deprived urban communities with poor access to open space. For all members of the community they afford the opportunity to enjoy recreation locally and thus to cut back on the carbon emissions arising from leisure activities further afield. Green Belts can also provide havens for wildlife, so can help to tackle the biodiversity crisis.

The purposes of Green Belts remain as valid now as they ever were; they are an important quality of life investment for future generations and so deserve stronger protection. The purposes and benefits of Green Belts are clearly understood and supported by the general public. In a poll of Scottish residents carried out for APRS by Survation in June 2017, 74.6% of those who expressed an opinion agreed that "All Green Belt land in Scotland should have stronger protection from building development".

However, the integrity of our Green Belts is under constant threat, primarily for housing development which should mostly take place on brownfield land. Existing Green Belt policy aims to guide development to the most appropriate locations, whilst protecting the rural character of the landscape settings of towns and preventing them from merging. However, the Scottish Government's unduly simplistic promotion of economic growth, including through the NPF, has fed through the planning system to the detriment of the environment and the quality of life of local communities in many places. Local community groups report serious concerns about significant Green Belt losses and the need for their stronger protection through the planning system. Substantial developments are currently proposed in Green Belts around for example Aberdeen, Edinburgh, Glasgow, Perth, St Andrews and Stirling. The Scottish Government has recently approved major developments in both the Edinburgh and Stirling Green Belts, in each case overturning a decision to refuse them by the local planning authorities, Midlothian Council and Stirling Council.

At Stage 3 of the Planning (Scotland) Act 2019 the Planning Minister stated: "I fully recognise the importance of the Green Belt" and "I fully expect that, as we take forward our review of the National Planning Framework, we will have a proper debate on the future role of Green Belts in Scotland. I also expect that we will closely consider the issues of greenfield versus brownfield development."

The Scottish Government should therefore use NPF4 to give stronger protection to Green Belts, to promote their positive management for landscape and recreation and to encourage local authorities to extend existing Green Belts and to designate new ones. The current wording in SPP regarding Green Belts is somewhat grudging and half-hearted. NPF4 should instead set out unequivocally the many positive benefits of Green Belts, and should require local planning authorities to use Regional Spatial Strategies and Local Development Plans to give stronger protection to Green Belts and to manage them more effectively for the long-term benefit of local communities and the climate. Local planning authorities should be forbidden from granting planning permission for building developments on Green Belt land while undeveloped brownfield land remains in their area. Unmet housing targets should no longer be considered a valid reason for allowing otherwise unacceptable housing development on Green Belt land. Suggested replacement wording is attached at Appendix 1.

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

Scotland's first two National Parks have achieved a great deal in their first 15 years and represent remarkable value for money. They inspire pride and passion amongst local people and visitors and provide many benefits to local residents, visitors and Scotland. 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.

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

We therefore propose that NPF4 should include as a National Development the designation of a suite of National Parks, including two in Galloway and the Borders. The "Unfinished Business" report published jointly by APRS and the Scottish Campaign for National Parks in 2013 identified seven areas with the potential to satisfy the criteria laid down in the National Parks (Scotland) Act 2000. Such action 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.

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 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 areas therefore also benefit from some degree of management strategy in the form of 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 under-publicised and lacking in active planned management. 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. However, there has been some positive 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 regarding 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.

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.

Supplementary Planning Guidance

The 2019 Planning Act removed the formal status of Supplementary Planning Guidance (SPG) as part of the development plan. SPG currently provides substantial amounts of

detailed technical advice which can be crucial to promoting high-quality development. The Scottish Government must therefore clarify whether the content of such guidance will now be incorporated into NPF4, and if so, how its content can be tailored to support local distinctiveness across the country.

Spaceports

APRS has recently been contacted by local people in both Sutherland and North Uist concerned about proposals to construct a 'Spaceport' in their respective areas, and we understand that similar proposals are also being mooted on Unst in Shetland and at Machrihanish in Argyll. The issue of whether Scotland would benefit from having a Spaceport, and if so, which would be the least damaging site from a social and environmental point of view, is clearly of national importance. This should therefore be decided by the Scottish Government rather than by local planning authorities.

We therefore suggest that the review of NPF4 is the obvious mechanism for ensuring the appropriate level of debate around this proposal. This would allow consideration to be given to re-using already-developed industrial sites, such as Prestwick or Machrihanish, which might benefit from a new use, rather than causing unnecessary damage to unspoilt greenfield sites. It would also ensure that the proposal is thoroughly tested against the Climate Emergency and that the necessary strategic environmental assessment is carried out.

Prime Agricultural Land

The new NPF4 should give much stronger protection to prime agricultural land (PAL), an important and finite resource which is exceptionally valuable for the wide range of crops it can produce. This resource will become increasingly important for greater production of home-grown food and reduced reliance upon food imports. As NPF3 correctly pointed out, much of our prime agricultural land is located close to cities, in particular those on the east coast where demand for development land is greatest. The weak wording in the current SPP which allows development on PAL "where it is essential as a component of the settlement strategy" should therefore be removed in NPF4.

About APRS

APRS is the charity which promotes the care of **all** of Scotland's rural landscapes. We campaign with others for better national landscape and planning policies. We advise our members and others how best to protect the local landscapes which they value as the settings for their lives.

Further Information

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Appendix 1 – Proposed NPF4 wording re Green Belts

Green Belts are the countryside next door for millions of people – vital local green spaces where people can enjoy fresh air and take valuable exercise. They provide both mental and physical health benefits, across all socio-economic classes. They protect valued aspects of our natural and cultural heritage, including the landscape settings of our towns and cities. They make an important contribution to Scottish Government objectives to tackle the Climate Emergency, halt biodiversity loss, address the obesity crisis and promote physical and mental well-being. If extended and better managed they could do even more to support these vital agendas. Green Belts are well understood by and popular with people in Scotland.

Planning authorities are therefore encouraged to use Regional Spatial Strategies and Local Development Plans to designate Green Belts around cities and towns and to extend existing Green Belts, to support the spatial strategy by:

- directing development to the most appropriate locations and supporting urban regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space.

The spatial form of the Green Belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should show the detailed boundary of any Green Belt, giving consideration to:

- excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments;
- the need for development in smaller settlements within the Green Belt, where appropriate leaving room for expansion;
- redirecting development pressure to more suitable locations; and
- establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary.

Local development plans should describe the types and scales of development which might be appropriate within a Green Belt. These may include:

- development associated with agriculture, including the reuse of historic agricultural buildings;
- development associated with woodland and forestry, including community woodlands;
- horticulture, including market gardening and directly connected retailing;
- recreational uses that are compatible with an agricultural or natural setting;
- essential infrastructure such as digital communications infrastructure and electricity grid connections;
- development meeting a national requirement or established need, if no other suitable site is available; and
- intensification of established uses subject to the new development being of a suitable scale and form.

Planning authorities should not allow any other type of development in Green Belts while suitable brownfield sites remain available for development. All relevant national and local government agencies should work together with local communities to prepare, agree and implement strategies for the positive management of Green Belts aimed at maximising their benefits to Scotland's environment and society.