

Durness Community Council
Dated 30 04 2020

Dear Sir / Madam,

I am writing to submit my representation to the Scottish Government's 'Call for Ideas' on the National Planning Framework 4 (NPF4).

The local community in Sutherland do not wish to see further restrictive national planning policy being put in place in relation to Wild Land areas. Any further protection to wild land within the forthcoming review of NPF4 (and Scottish Planning Policy) risks having a greater detrimental effect upon the economic development and social sustainability of Sutherland. Our community has real concerns that the existing wild land area in Sutherland (namely Wild Land Areas 32, 33, 34, 37, 38, 40) already identify too great a land area within our county and act as a break on our economy. In short we believe that the wild land areas need to be redrawn to account of local knowledge and local needs.

We are not against Wild Land in principle, and we recognise that wild land does exist in Sutherland. However we believed that Wild Land boundaries should be rationalised and pulled back in locations where wildness quality are more limited and where economic development opportunities exist. This view is not just about the ability for more wind farms to be built in Sutherland. Our communities are largely supportive of wind farms in the right location and at the right scale, where there is limited if any impacts on the local community. But the impact of the current wild land policy goes far beyond wind farms and limits our ability to deliver most forms of physical development and economic activity in areas of wild land.

Wild Land mapping is blunt and covers too large an area of Sutherland. It is clearly not informed by local knowledge. Scottish Natural Heritage estimated that 20% of Scotland's land coverage was mapped as wild land. The majority of this is located in the North Highlands, where wild land coverage is in excess of 50%. Although Wild Land is not a designation it has unfortunately been treated as one in planning.

To date since 2014, only one consent has been granted for a wind development in a WLA. Part of the consented Creag Riabhach wind farm is within a WLA. This is located close to us in Sutherland. In contrast various schemes have been refused consent for development wholly or partly within WLAs (Allt Duine, Glenmorie, Sallachy, Glencassley, Culachy, Caplich, Carn Gorm). The Sallachy Project, based in Central Sutherland is largely supported by the local community and would bring many benefits to Central and North West Sutherland but has been delayed for several years over what we believe to be confusing Wild Land policy.

We would appreciate your consideration of how wild land policy currently impacts rural communities like Central and North West Sutherland. It is evident that the current Wild Land policy is having a negative impact on these areas and needs to be amended in the interest of all parties. The Scottish Government's NPF4 provides the opportunity for a positive rebalance of policy. Decisions on the planning balance should take greater account of the local view and respect the planning judgement of Highland Council, who are better placed to judge the planning balance than national policymakers.

Yours sincerely,
Donald Campbell
Chair Durness Community Council