

ISSUE 100
Spring 2022

Wild Land News

Magazine of the Scottish Wild Land Group

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FREE TO MEMBERS



100th Issue

THE STATE OF WILD LAND IN THE HIGHLANDS

40th Anniversary of the Group



Spring 2022

WILD LAND NEWS

Issue 100

Magazine of the
Scottish Wild Land Group

SWLG

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Please send in contributions.

Individual articles do not
necessarily reflect the views of
the SWLG Steering Team.

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*Front cover: Sgorr Dearg, above
Ballachulish
Left: Corrour Station*

*All photos by James Fenton unless
otherwise stated*

James Fenton

Editorial – 40th Anniversary Year

This year marks the **40th Anniversary** of the founding of the Scottish Wild Land Group, established in 1982 to promote the conservation of wild land. It is also, by chance, the 60th Anniversary of Tiso, who have always supported the group by advertising in *Wild Land News* and having it available in their shops.

And this is the **100th edition** of *Wild Land News*, a journal which has recorded the many threats to wild land over the years. Tim Ambrose's article on page five highlights many of these current in the 1980s, but unfortunately, 40 years on, there appears to be no let-up in the rate of attrition of wild land. There is as much need for SWLG now as in the 1980s.

To mark its first 40 years, the group commissioned a major report *The State of Wild Land in the Scottish Highlands*, written by acknowledged experts in the field, which is summarised on page 18 onwards. The report does give a good overview of the history of wild land protection in Scotland to date, but its main conclusions, sadly, are that attrition continues, that it has no strong legal protection, and that there is no consistency from government and planning authorities on whether a

given development in wild land is given permission or not.

One of the aims of the report was to provide strong evidence of the long-term loss of wild land so that the new government planning guidance, the forthcoming National Planning Framework 4, will strongly support the protection of wild land from inappropriate development. Let us hope that the government has paid attention to the responses on the consultation draft from SWLG and others. After all, as outlined by Jonathan Binny in his article on page 13, wild land is not just a wishy-washy concept, but something that brings real economic benefit to the country.

—————
No let-up
in rate of
attrition
of wild
land over
40 years
—————

The SWLG strongly thanks the **Scottish Mountaineering Trust** and **The Cairngorms Campaign** who share similar views and who both supported the publication of the report. Let us hope that SWLG will no longer be needed after the next 40 years because the value of wild land has become embedded in Scottish politics and culture. Or is this wishful thinking?

The Group is run entirely by volunteers and is always looking for new people: see the Noticeboard.



NOTICEBOARD



Notice of 40th Annual General Meeting

The 2022 AGM of the Scottish Wild Land Group will be held on **Saturday 3 December**. Keep the date free in your diary and check the SWLG website nearer the time for details.

New report: *The State of Wild Land in the Scottish Highlands* (see page 17)

The report can be downloaded from the news section of swlg.org.uk
Hard copies (free) can be obtained from James Fenton: james@ecology.scot
Copies will also be available at the AGM.

New SWLG leaflets

We will soon be printing new leaflets to publicise the activities of the group and so gain new members. Please contact admin@swlg.org.uk if you would like to help in distributing these in outlets around Scotland. They will also be at the AGM.

Social media help required

We are always looking for new volunteers to help improve the group's social media presence, whether *via* the website, facebook or twitter. Please contact admin@swlg.org.uk if you would like to assist in this.

New Steering Group members always welcome

As the report described in page 17 concludes, the threats to wild land are not going away: if anything they are increasing. So if you are concerned about the fate of wild land, particularly if you make recreational use of it, why not join the Steering Group? We are all volunteers and new blood is always welcome.

Damaging development

If you come across any damaging development, or any one proposed which you think may be a threat to wild land, then please let us know. We have a template for raising an objection with the relevant planning authority: contact us at admin@swlg.org.uk

Articles sought for *Wild Land News*

Wild Land News does not write itself! Articles are always welcome on any aspect of wild land: damaging development, personal reflections, philosophical thoughts ... Please send them to the editor *via* admin@swlg.org.uk

Tim Ambrose

Wild Land News: 100, not out!

See centre page spread for images of WLN covers over the years

As I write this note, I have the first 99 issues of Wild Land News arrayed around me at my table. Numbers 1 to 58 are in the distinctive black and white, and 59 onwards in colour. 98 of the issues are A5 size, with just issue 83 from Spring 2013 *Wind Farms Gone Wild* in larger A4 format. All are full of passionate support for Scotland's wild land and together they are a record of both the changing pressures and some constant threats in the last 40 years.

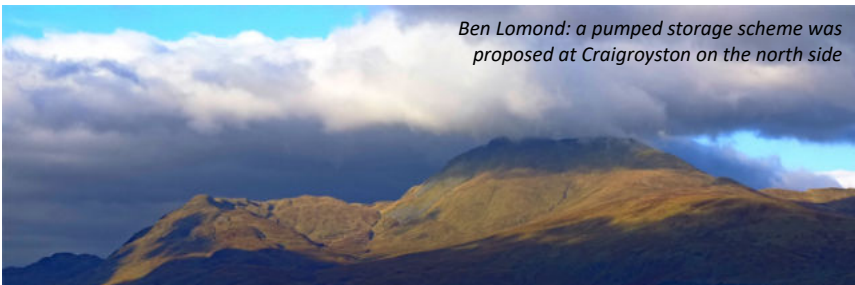
The first issue, Spring 1983, records the formation of the SWLG in October 1982, with the initial dozen members growing rapidly to over 200 by the first magazine. Chairman Roger Smith urged that "A sensible policy for land use must include adequate provision for the conservation of outstanding scenic areas such as Knoydart" which was then under threat as the Knoydart Estate was for sale and the Ministry of

Defence interested in buying it for military practice. This would have destroyed both the wildness of the scenery, and also swamped the local community, which was as great a concern to the SWLG.

Jim Crumley started a never-ending discussion on what we mean by 'wild land' in Scotland – neither utterly untouched, nor a no-people desert, but "land which can be allowed to remain as primitive and untamed as humanly possible ... land which is sufficiently commanding for the impact of its landscape, sufficiently free of the influence of urbanised humanity, to evoke feelings of rare and rich freedom." Even then, "Too much has been irreversibly destroyed and too little is left intact".

Rennie McOwan wrote on the *Facts and the Myths of Trespass in Scotland*, an issue where matters have

Many of the issues which threaten wild land are the same as when the SWLG was founded in 1982



Ben Lomond: a pumped storage scheme was proposed at Craigroyston on the north side



Ben Wyvis, site of a proposed mountain railway

indubitably improved since 1983 with the Right to Roam. The other two articles in the First issue concerned specific threats to Loch Lomond, including a pumped storage reservoir for Craigroyston, and the proposal to build a mountain railway up Ben Wyvis. The SWLG urged that the long-term plan for the Loch Lomond area be rethought, and that any funds available for a mountain railway on Ben Wyvis be redirected towards the existing, but struggling, Kyle line and the possible re-opening of the branch to Strathpeffer.

The final page of the First issue, before the Tiso advertisement on the back, summarises the then threats to wild land – a rash of bulldozed tracks, unsightly forestry in the wrong place, loss of habitat for wildlife, ugly and badly sited buildings, and erosion caused by over-exploitation of particular sites for tourism. The causes arose from inadequate legislation and inadequate consultation – little has changed in 40 years.

WLN2 came out in Autumn 1983, and, as well as an early warning about run-of-river schemes on the south side of Loch Maree, included a powerful

argument against uncontrolled bulldozed tracks for shooting parties, by Adam Watson. He contrasted the carefully constructed and well drained tracks made in the 1800's and early 1900's for predominantly horse-drawn vehicles by pick and shovel, with the hasty and poorly made tracks being bulldozed through shooting estates to enable foreign shooters quicker and easier access to the prime stalking locations. Tracks made without drains, or proper borders, rapidly deteriorate into wide spoil chutes which reject regrowth and scar the views for miles around. How much progress has been made here either?

The second issue of WLN also included an article by Drennan Watson, of the 'splendid' North East Mountain Trust, about the prospect of unsuitable block commercial forestry planting on Creag Meagaidh – a threat from Fountain Forestry, later averted after pressure from the then Nature Conservancy Council and climbers.

WLN3 addressed the difficult issue of downhill piste skiing for the first time, following recently finalised National Planning Guidelines which encouraged further development to the then four



WLN2 came out in 1983 with an early warning about run-of-river schemes on the south side of Loch Maree. Such a scheme was in fact constructed in 2016, along the River Grudie. Beinn Eighe is visible on the left – within a Wild Land Area

locations in Scotland – Cairngorm, Glenshee, Glencoe and the Lecht, and at possible secondary sites at Aonach Mor, Drumochter, Ben Wyvis and A'Chailleach in the Monadhliath. We concluded that the Scottish climate is largely unsuitable for piste skiing, and that piste skiing “with all its paraphernalia littering the hillside” is certainly unsuitable for Scotland. “Skiers should not expect costly and environmentally damaging uplift facilities to be provided to take them to the top of every skiable hill in Scotland.”

This issue also hosted an article by the giant of Scottish mountaineering, W H Murray, defending Percy Unna’s management policy for mountain lands. Unna advocated allowing unrestricted access to wild land, while maintaining that wildness so far as possible, without making access easier by use of bridges, signposts or man-

made paths. Inevitably, conflicts arise, erosion follows over-use, and tricky choices have to be made. Unna’s approach was frequently attacked as being selfish, for example by those advocating the damming of Glen Nevis to flood the upper Glen to make an artificial loch to provide hydro-electricity – objectors would deny the benefits of electric power to the peoples of the Highlands! Similarly, those who objected to afforestation of Rannoch Moor and the Trossachs with stands of Sitka spruce were denying a crop and jobs to Highland people. Murray concluded that one must beware of easy presumptions like “The mountain properties exist for public enjoyment.” That can lead to a misconception that wild lands are there to minister to our needs and recreation. But “the primary fact is that land and wildlife have their own being in their own right, and our true interest is bound up with theirs.”

I will conclude this brief historical survey of the early issues in Wild Land News with a note of WLN 4. This included an appreciation of Nigel Hawkins, who was one of the founders of the SWLG, but who left in 1984 to develop the John Muir Trust, which aimed to buy, manage and preserve vital areas of wild land. The JMT has been one of Scotland's success stories of the past 40 years. WLN 4 also railed against the then tax benefits of forestry planting. Where once the statutory Forestry Commission was the dominant party involved in Scottish forestry, Government pressure on it to raise funds had led to sell-offs and a new breed of landowners with little concern about standards of planting or landscaping. This was leading to much destruction of peatlands and unsuitable Sitka

blocks, and the loss of protection for ancient woodland.

So many of the issues which threaten the wild land today are the same as when the SWLG was founded – industrial wind farms and climate change are perhaps the major new (or newly recognised) challenges which have grown in importance, along with the continuing loss of biodiversity over the period. We must continue to demand stronger protection for the remaining areas of wild land in Scotland, as we did in response to the draft National Planning Framework 4 earlier this year, and hope that the next 100 issues of Wild Land News will be able to show some improvements over the coming 40 years.

Tim Ambrose has been Treasurer of the Scottish Wild Land Group since he succeeded Irvine Butterfield in 1988

SWLG argued against afforestation of the Moor of Rannoch





Photo. Norman McNab

Scottish Wild Land Group

The Scottish Wild Land Group (SWLG) is a wild land charity which is run wholly by volunteers. SWLG was established in 1982 to protect and conserve wild land in Scotland, and has campaigned on a wide range of issues.

We regularly produce our magazine *Wild Land News*, which is free to members.

Please **join us today** and help to give Scotland's wild places a voice.

Objectives of the group:

- To promote the conservation of wild land in Scotland
- To promote public awareness of the problems facing wild land in Scotland
- To promote and encourage the implementation of good planning policies
- To co-operate with other bodies to promote the foregoing objectives

Wild Land in Scotland

Wild land areas in Scotland are dominated by natural vegetation, a lack of human intrusion from built structures and the rugged and remote nature of the terrain.

In 2014 SNH (now NatureScot) undertook to map wild land in Scotland. Their map can be found [here](#).



Atlantic oak woodland near Lach Linnh, Diego Cove

Latest News



Scotland 2045: National Planning Framework draft consultation

The consultation concludes at the end of this month and will determine the future of wild land in the planning system.

Advice on how you can respond can be found [here](#). Your response can be quite simple but the numbers responding will have an influence on the outcome.

SWLG response can be found [here](#).

Scotland's Wild Land is Under Threat

See a recent article in the online magazines UKHillwalking and UKClimbing which explains the threat to wild land and what you can do to promote its stronger protection. [Read the article here](#).

See also the Scottish Wild Group's



Facebook pages



Twitter pages

The group is always looking for volunteers to help develop its social media presence

Contact admin@swlg.co.uk

SWLG website update

In 2018 the company that owned the software used to create the Wild Land Group's website was taken over. The new owners were developing new software with "powerful, flexible eCommerce solutions". It became clear that we would soon have to use the new software and some work would be required to change our site so the new software could be used. The changes would not be insignificant, and this presented us with an opportunity to build a new website.

I considered the design for a new website, keeping a similar page structure to the original site but with banner pictures on each page and a more appealing front page. Our original website was developed by former committee member Jayne Glass who did an excellent job and maintained the site for several years.

I took over from Jayne three years ago. Jayne and her husband Ryan have a website design company, Big Toe Web Design Ltd.

I contacted Jayne and Ryan and they sent me examples of sites they had developed. One was very similar to my concept. Using this, I designed the new site and we contacted web design companies for costings. I was delighted that Big Toe Web Design Ltd.

were the cheapest both for the design and site maintenance – so we have been working with them. Ryan has now taken over the site maintenance from me.

Key to the new design is a banner picture on each page. I have photographs from two friends in the Munro Society. We have sufficient for monthly updates for a couple of years. However, members will be encouraged to submit photographs that we can also use.

The two photographers that have supplied our present photographs are:

Norman McNab. Over the years he has specialised in taking photographs of mountains, some at sun rise and sunset. This has necessitated in many nights camping high up in all seasons. Some of his winter camps are remarkable

Derek Sime. The editor of the Munro Society Newsletter. His love of mountains and wild places is illustrated by his wonderful photographs.

Thanks to Peter Willimott for his coordination of the website update and for his contribution to the Steering Group. He has recently stood down from both

Tim Ambrose

Change of status of SWLG

**Farewell Scottish Wild Land Group,
(Charity number SC004014 – “old
SWLG”)**

**Welcome Scottish Wild Land Group
SCIO, (Charity number SC051654 –
“new SCIO”)**

When the Scottish Wild Land Group was set up in 1982, it was natural for it to be constituted as a Charity which was an Unincorporated Association. But in the 40 years since then, the legal position and responsibilities of Charities in Scotland have moved on considerably, particularly with the establishment of the Office of the Scottish Charity Register (OSCR) in 2005/06, and passing of the Charities and Trustee Investment (Scotland) Act in 2005. OSCR introduced a new legal structure for Scottish Charities, a Scottish Charitable Incorporated Organisation (SCIO) in 2011, and since then many Unincorporated Associations have converted to SCIO status.

The two principal differences are that a SCIO has a separate legal identity and existence from the individuals who make up its governing body (i.e., its Trustees) and from its members, and it also has limited liability, which protects its Trustees and members from the risk



of personal liability for the charity's debts or obligations should it be sued or suffer disastrous financial liabilities or losses. The benefit of separate legal standing is that it makes it easier for the Charity to enter into contracts, for example if it wants to employ anyone, or lease an office or photocopier, and the benefit of limited liability protects anyone who wishes to act as a Trustee from personal risk, which may make it easier to attract some to serve on the Steering Group.

The full Constitution of the Scottish Wild Land Group SCIO has been approved by OSCR, and may be found on the SWLG website. The members at the AGM of the old SWLG on 4 December 2021 voted unanimously in favour of a Motion to allow the Trustees to proceed with the steps necessary to wind up the old SWLG, and to transfer its assets to the new SCIO.

At midnight on Tuesday 31 May 2022, the old Scottish Wild Land Group will cease to exist. Don't worry, all its funds and other assets like its membership list and any receivables and intangibles will pass directly to the Scottish Wild Land Group SCIO, which is technically a new Charity, but with virtually identical aims and objectives. Members of the old charity should not notice any difference, and your membership will carry over to the new SCIO.

We intend to ensure that the Bank account will remain the same, and there will be no change in membership subscriptions or practical arrangements. The rules for determining membership of a SCIO are slightly less flexible than those we

have applied in practice in past years, and the Constitution specifies that any member who has not paid their annual subscription by the end of a calendar year, after at least one reminder, shall then cease to be a member of the new SCIO.

From 1 June, all our publications and stationery will include a clear statement that we are a SCIO, and give our Charity number, SC051654. The contact address remains at 8 Clevedon Road, Glasgow, G12 0NT, and we look forward to the future of the SWLG SCIO with renewed confidence.

Tim Ambrose is Treasurer of the Group

Stob Coire na Ceannain (The Grey Corries)



What is the value of wild land?

This an important question because if wild land has no value then its future existence is of no consequence. Let me begin with a quote from NatureScot, the government's advisory body on the natural environment (previously Scottish Natural Heritage, SNH):

“Our wild land:

- is a big part of Scotland’s identity
- brings significant economic benefits – attracting visitors and tourists
- offers people psychological and spiritual benefit
- provides increasingly important havens for Scotland’s wildlife” (1)

That says it all, but does the Scottish Government agree with its own advisory body? Well it would seem so, based on the comments they made in 2018:

“Scotland's rich and diverse natural environment is our greatest national asset. It is at the very heart of our national identity and culture and is world-renowned for its beauty.

Scotland's nature is unique, with awe-inspiring landscapes and habitats found in few other places on earth ...

“Scotland’s natural environment is also fundamental to our culture, national identity and social wellbeing. Our landscapes and nature have long provided an important source of inspiration for our art, literature and music and help to define who we are as a nation” (2)

A glance at the 2014 SNH map of wild land shows that such land is extensive, especially in the Highlands; hence these comments must include wild land together with its contribution to the above fundamentals.

Some might argue this is all well and good but it is not the hard cash the country needs. However, the NatureScot quote above does say that wild land has “economic benefits”, which is illustrated in an article by Paul Webster from 2019:

“Tourism is one of Scotland’s largest industries, employing 200,000 people. In 2012 the economic value of tourist trips involving overnight stay was £4.4 billion. There are also 188 million day visits in a year to outdoors, spending another £3.95 billion. Tourist spending on nature-based activities accounts for 40% of the total – and obviously a much higher figure if you exclude tourism in our cities.

“It’s impossible to truly separate out that relating to wild land. If we include forest and woodland, there are 112.3 million visits and £2.36 billion annual spend. If counting only mountain and moorland, 19.9 million visits and £411-£751 million spend – even on the narrowest definition, that supports 20,600 jobs ...

“The bulk of economic activity in the remote Highlands depends on tourism (including construction jobs, retail, crafting) ... Without the visitor



economy, the population increase in the Highlands over recent decades could not have occurred – instead the exoduses of the past from these remote communities would be continuing today” [3]

Or as Alan McCombes put it:

“People don’t travel from across the world to visit Strathclyde Country Park. But they do come to the Highlands to climb the mountains, walk the hills, breathe the clean air, photograph the landscape. And they sustain thousands of small business in the tourist sector – which is by far the biggest employer in the Highlands today, with a workforce eight times larger than the entire onshore energy sector and nine times bigger than agriculture, forestry and fishing combined.” [3]

The Scottish Government seem to support this idea:

“The ecosystem services our environment generates are estimated to contribute at least £20 billion to the Scottish economy every year, and the real contribution will be much greater, since many ecosystem services cannot be valued in monetary terms.” [2]

Again they are not talking directly about wild land and it would be difficult to extract its specific

contribution, but I am sure it will not be insignificant.

Another way to view the value of wild land is to consider what people think of it: again Paul Webster covered this point:

“In one scientific opinion poll, 91% of Scots say they support ‘conservation of wild land in Scotland’ – with 70% rating it as very important to retain our wild lands. In another that looked specifically at the Wild Land map, 75% of Scots say they support special protection from development for these identified areas.”[3]

Wild land is a precious resource and once gone cannot be restored. It has, and continues, to contribute to the Scottish nation both culturally and economically. We should recognise that and ensure this finite resource is given the status it deserves.

References

- (1) NatureScot *Landscape Policy: wild land*.
- (2) Scottish Government *Developing an environmental strategy for Scotland: discussion paper*, 29 June 2018.
- (3) walkhighlands *Wild land and its critics* by Paul Webster, 5 March 2019.

Jonathan Binny is Convenor of SWLG



issues of Wild Land News Photo. Tim Ambrose

Special report

THE STATE OF WILD LAND IN THE SCOTTISH HIGHLANDS



Photo. Steve Carver

prepared for

Scottish Wild Land Group

in association with

**The Scottish Mountaineering Trust
and The Cairngorms Campaign**

by

Wildland Research Limited

and

Ian Kelly Planning Consultancy Limited

February 2022

Download the report from the News Page of www.swlg.org.uk

Hard copies (free) can be obtained from James Fenton, ecology@fenton.scot

BACKGROUND

by James Fenton

Threats to wild land

You have probably all seen the tourist brochures “Come to the wild Highlands”, “Experience Scotland’s stunning scenery”, “Get away from it all in the Scottish Highlands” ... Easy words to say and trotted-out all the time by the tourism businesses and agencies. It is based on a romantic image of an unspoilt land, of hills, lochs and moors untrammelled by the infrastructure of the modern world. What is perhaps surprising is that this image is rarely challenged. Even the hillwalking press seems to spend more time extolling fantastic walks and climbs in the remote hills without any mention of the fact that many of them are remote no more.

In the Highlands today, it is hard to be more than a mile or two from a bulldozed vehicle track, a forestry plantation or a mobile phone mast. The glens are increasingly being filled-up with renewable energy infrastructure: it would appear that soon every good-sized burn will have a dam, a buried pipe, an access track and a power station at the bottom. Such run-of-river hydroelectric schemes are turning up everywhere, even venturing into the heart of the Torridon mountains (see photograph on page 8).

And with the turbine height of wind farms growing ever taller, now to 150 metres (500 feet, the height of the Forth Road Bridge towers), even if not nearby they can be seen from many summits – a trend which is likely to get

worse as increasingly high renewable energy targets are set. And all new wind farms come with an extensive network of new bulldozed tracks.

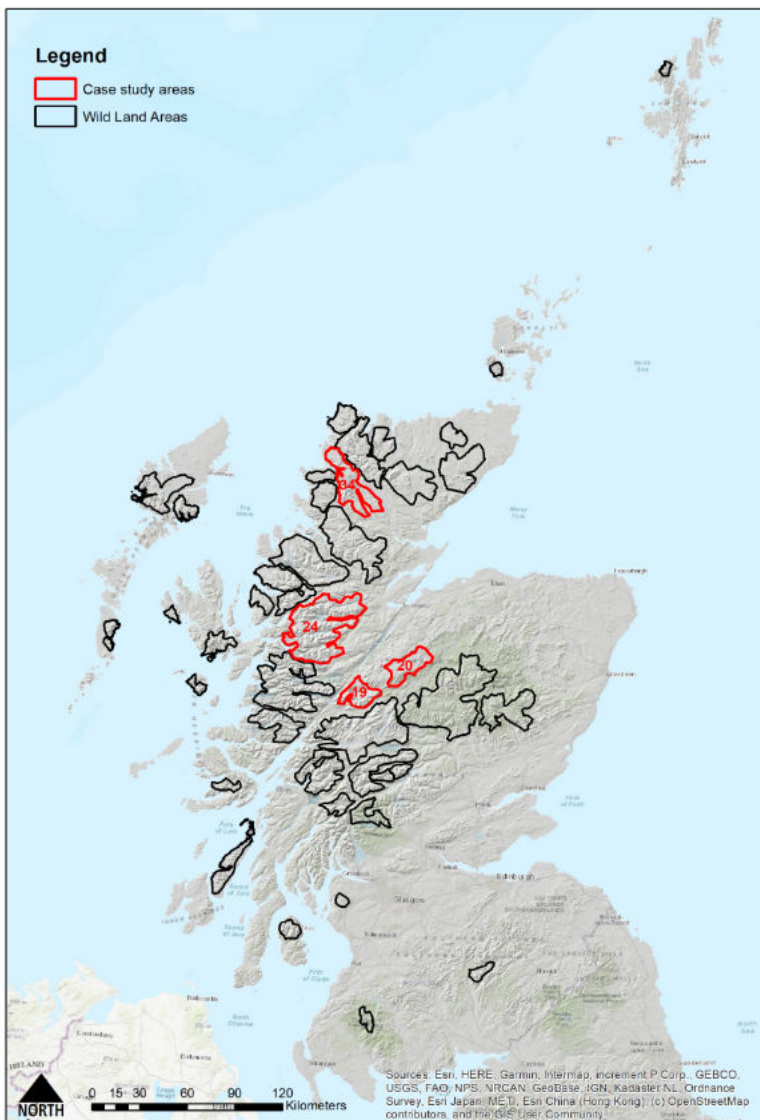
Likewise, government policy is pushing for a marked increase in forest cover, and modern forestry practice is not sensitive to the environment, involving as it does ploughing or mounding, deer fencing, major vehicle tracks and ugly clear-felling. There is also the ever-increasing problem of non-native conifers, particularly Sitka spruce, seeding out of these plantations and beginning a takeover of the wider landscape. If no action is taken, in a hundred years or so many of the hills will no longer be open moorland but transformed into spruce forest.

And of course, Highland estate owners are continuing their relentless construction of new hill tracks into the heart of the hills, often to ease the access of their shooting clients. Walking must be too hard for them!

So why is there no outcry about all this? Indeed, why is the hillwalking fraternity, indeed the public at large, so silent while, at the same time enjoying the freedom and remaining wildness of the open hills? Surely everyone must be noticing the slow attrition of the wildness of the Highlands, indeed of hill regions throughout Britain?

Quantifying the threat

It is easy to say that the wildness of the hills is being lost, but if we want to convince politicians that something needs to be done about it they will ask for evidence. However, although



The Wild Land Areas with the case study WLAs outlined in red

everyone can point to specific instances of inappropriate development in wild land, there has been no hard evidence that demonstrates the overall rate at which wildness is being lost in our hills. Up until now, that is, for the Scottish Wild Land Group's new report *The State of Wild Land in the Scottish Highlands* does provide the evidence.

The report was commissioned in collaboration with the Scottish Mountaineering Trust and The Cairngorms Campaign, who share concerns about the loss of wild land. The research itself was undertaken by the prestigious Wild Land Research Institute at Leeds University and Ian Kelly Planning Consultants. Indeed, it was the team at Leeds University, led by Steve Carver, who mapped the wildness across Scotland, resulting in NatureScot's Wild Land Areas (WLAs) map with its identification of 42 WLAs.

The research team took a sample of four such WLAs and studied in detail the trends in wildness from 1750 to the present day. 1750 was chosen as the start date because there is a good series of maps from this period (the Roy Maps).

The four WLAs studied in detail were:

WLA 19 Braeroy–Glenshirra–Creag Meagaidh

WLA 20 Monadhliath and the adjoining areas around Stronelaig and Melgarve

WLA 34 Reay – Cassley

WLA 24 Central Highlands

MAIN REPORT FINDINGS

1. The wildest areas of Scotland have been mapped by NatureScot as 'Wild Land Areas', of which there are 42. There is no absolute protection for them under law, although they are referred to in Scotland's national planning policy where it states: "We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important landscape." (from the National Planning Framework 3). However the report concludes that the Wild Land Areas are at risk from development pressures and that their wild status is under threat of long-term degradation.

2. Development within these areas over the last 250 years has significantly impacted on the remaining areas of wild land. Such impacts are principally from road and track construction which reduce remoteness by providing easier access to wild areas, and from new structures which stand out in the landscape with a corresponding reduction in wildness.

3. Forms of visual intrusion have changed over the period mapped and have tended to go in phases starting with road and rail and construction, and more recently seeing phases of development in renewable energy: first hydro power in the 50s and 60s, wind energy in the last 20+ years and now small-scale run-of-river schemes. Plantation forestry has also moved in phases but at different rates throughout the period. Associated with all of these, and also with estate

management, has been continual expansion of the hill track network.

4. It is only eight years since the mapping and designation of Wild Land Areas in Scotland in 2014. This makes it too soon to say whether they have had an effect on slowing the rate of loss of wild land from reductions in remoteness and visual impacts. Nonetheless, long-term and short-term rates of attrition, if extrapolated, would indicate continued threat to the remaining areas of unimpacted, remote wild land. Whether this means that there will be some future point at which all wild land ceases to exist is open to question.

5. Wind farms do not have to be inside the boundaries of a Wild Land Area to affect the experience of wildness because wind farms nearby are still highly visible. There are some Wild Land Areas, such as WLA 39 (East Halladale Flows, Caithness) and WLA 1 (Merrick, in Galloway) that are close to being surrounded by wind farms that have been built, consented or proposed. Additionally, Scottish Ministers gave permission for the Creag Riabhach wind farm which had turbines within a Wild Land Area (WLA 37 Foinaven–Ben Hee, in Sutherland).

6. The recent and current planning policy provisions at national and local level have not prevented the continuing attrition of wild land, whilst wind farm applications continue to be random, speculative proposals which are followed by often inconsistent decision-making. There is an absence of positive and consistent planning oversight.

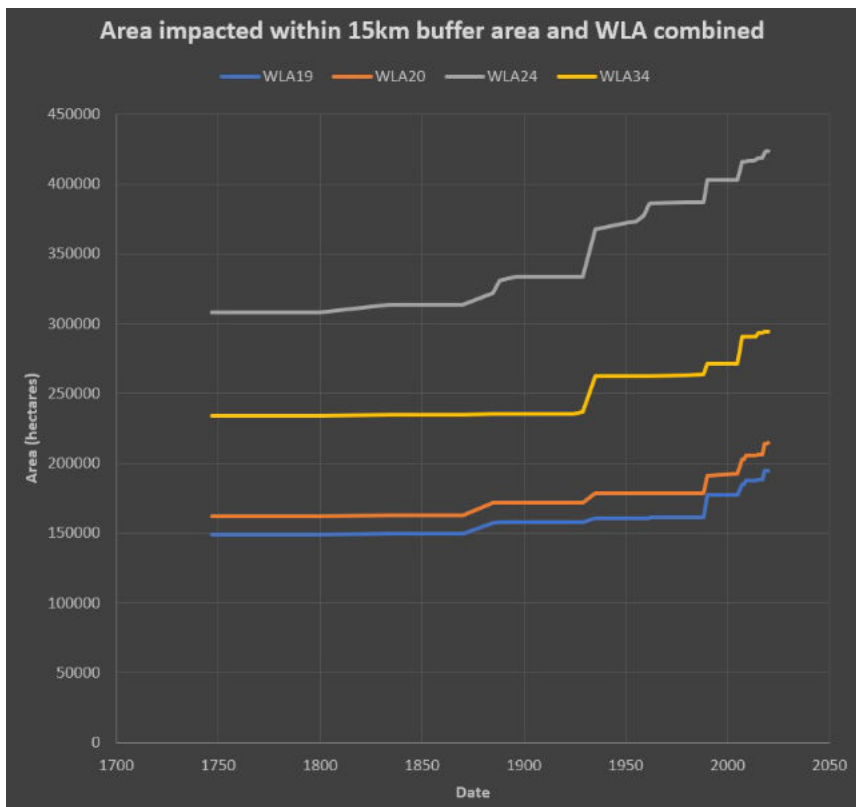
Ineffectiveness of the current planning regime for new wind farms

An analysis on how decisions are made to approve or reject new wind farms in Highland shows:

- a) There has been no positive Council-led land use planning for wind energy.
- b) Instead, each application has been entirely locationally specific, largely driven by there being a willing landowner, followed by an individual project recommendation and/or decision often taken by someone with no democratic accountability to the locality.
- c) The result is completely random decision making in respect of wind farms.

The Farr windfarm in the Monadhliath





Rate of loss of wild land over time

Long-term trend in wild land attrition rates (1747 – 2020) in the four case study Wild Land Areas (WLAs); from Figure 3.10 of the report.

d) This non plan-led speculative application and decision-making process lies at the heart of the significant disagreements between interested parties and within communities when individual projects are considered.

The above conclusions are in stark contrast with the conclusions that would be reached in looking at almost any other form of major land use developments in Scotland.

Recommendations relevant to the recent Government consultation on the new National Planning Framework (NPF4)

The Scottish Government has recently completed its consultation on the content on the new National Planning Framework (NPF4). The existing policy as given in Scottish Planning Policy 2 states:

"Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development."

To ensure there is still wild land in Scotland for future generation to enjoy, this statement needs to be retained in the new NPF4, and the policies on Wild Land Areas must not be abandoned or watered-down. Longer-term, the Wild Land Areas need to be given a stronger legal underpinning so that attrition of their special qualities no longer takes place.

In particular, if the Wild Land Areas and other wild and precious land is to

be seen as a national level asset to be protected and managed positively, then three things need to happen:

- 1) The decisions on the location of renewable energy schemes, and all of the ancillary directly associated onsite and offsite facilities, needs to be a Development Plan led process (as it is currently in England) which identifies preferred wind farm locations.
- 2) The process has to be driven by local democracy, community and place, the concepts that fundamentally underpin every other aspect of the statutory land use planning system in Scotland.
- 3) Within that process, landscape protection, planning and management policy, at national and local level, has to set out a map-based framework that identifies the National Parks, the National Scenic Areas, the Wild Land Areas and their settings; with an associated ban on commercial-scale wind farms in order to consistently and predictably deliver the required degree of protection from harm. It is recognised that this will probably need legislative change in order to modify the procedures for Electricity Act.





A FUTURE FOR WILD LAND?

If hillwalkers and others still want to experience wild mountain landscapes in the Highlands, then these places need stronger protection from new development, including commercial forestry plantations and hill tracks. And also from new renewable energy schemes for, although the country needs more renewable energy, it also needs to retain some wild landscapes where nature can still be experienced in the raw, where nature is still in charge and the visible hand of mankind is minimal. Hence, there is what is called a ‘green-on-green conflict’ – landscape conservation *versus* climate mitigation: two worthy environmental outcomes in conflict, for it is impossible to combine wild landscapes with industrial infrastructure.

Although NatureScot has identified the Wild Land Areas, they have no legal backing: they do not have the protection which is afforded by

legislation. However they are mentioned in current Government planning guidance, which states “We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset.” (from National Planning Framework 3).

The new National Planning Framework 4 (NPF4) is expected at some stage. The consultative draft did not identify wild land as ‘a nationally important asset’ although it did state:

“Development proposals for development in areas identified as wild land should only be supported where:

- the proposed development cannot be reasonably located outside of the wild land area; or,
- it is for small scale development directly linked to a rural business, croft or required to support a fragile population in a rural area; and,

- a site-based assessment of any significant effects on the qualities of the areas is undertaken, and use of siting, design or other mitigation minimises adverse impacts.”

It is said that pressure from the renewable energy industry is calling for a weakening of the protection given to Wild Land Areas, although this might be hearsay. However, it is undoubtedly true that the presence of WLAs does constrain the areas where large wind farms can be built. As it is, the policy currently rules out such wind farms in National Scenic Areas (the equivalent of Areas of Outstanding Natural Beauty in the rest of the UK) and National Parks.

It would be good if the final version of National Planning Framework 4 includes the statement from the previous framework: “We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset”; and that the above bullet points remain, with the addition of the phrase “There should be a presumption against

development in Wild Land Areas”. We will have to wait and see what the Scottish Government comes up with.

Long-term, the hillwalking fraternity, and others concerned about the loss of wild land, should argue for WLAs to be enshrined in law, for a conclusion of the wild land report is: “In the longer term, the Wild Land Areas need to be given a stronger legal underpinning so that attrition of their special qualities no longer takes place. In particular, care needs to be taken to ensure that WLAs are neither abandoned or watered down in the ongoing NPF4 consultation.”

Some good news

A proposed wind farm in wild land in the Monadhliath Mountains, the Glenshero scheme, has recently been refused permission by the Scottish Government because of its visual impact. This was opposed by Mountaineering Scotland amongst others. So it is not inevitable that our wild land in the Highlands will continue to disappear ...



Tollie Rock and Loch Kernsary



A wild landscape in Wester Ross (Beinn Dearg) showing an absence of modern infrastructure and which typifies the landscapes of Wild Land Areas

There is debate on the naturalness of such landscapes owing to fact that the absence of native woodland is seen by many as having been caused by human action in the past, although others disagree, arguing that there is little evidence for this

Be that as it may, such a landscape can be called wild owing to the absence of current infrastructure and by the fact that humans are not actively determining the vegetation pattern. The vegetation has an unbroken ecological link back to the end of the Ice Age and has never been consciously chosen: even the heather-clad grouse moors of the eastern Highlands would be heather-dominated, burning or not



THE LOSS OF WILD LAND OVER TIME

A modern Highland landscape in Argyll (Loch Glashan), managed for maximum economic benefit: forestry, windpower and hydroelectricity

The previously wild land is now commercial forestry plantation, largely Sitka spruce, with associated wide forestry tracks. There is a wind farm in the background and a new one being constructed in the middle distance. The loch no longer has natural water levels, having been converted into a reservoir with a dam and a drawdown zone

There is not much space left for wildness: is this the fate awaiting much of the Highlands? See the graph on page 23

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Scottish Wild Land Group

Working to protect Scotland's species, environment and landscapes



Liathach by James Fenton

The objects of the Group are:

- (a) To promote the conservation of wild land in Scotland;
- (b) To promote public awareness of the problems facing wild land in Scotland;
- (c) To promote and encourage the implementation of good planning policies;
- (d) To co-operate with other bodies to promote the foregoing objects.

We campaign for:

- ✓ Protection and promotion of Scotland's wild land
- ✓ Safeguards against inappropriate wind farm and other developments
- ✓ Environmentally-sensitive land and wildlife management
- ✓ Planning controls on the spread of hill tracks
- ✓ Restoration of rare and missing species and environments
- ✓ Connection of habitats and protected areas to allow ecological recovery and species movements

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