

ISSUE 93  
SUMMER 2018

# Wild Land News

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Magazine of the Scottish Wild Land Group

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**National Parks & wild land**

**Windfarms in the landscape**

**Windfarms: the next  
generation**

**Wildness in Torridon**

**Lust for the eyes**



# Summer 2018

## **WILD LAND NEWS**

**Issue 93**

Magazine of the  
Scottish Wild Land Group

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*Front cover: The Paps of Jura from Beinn Bheigier on Islay, by James Fenton*

*Left: Slioch from Coille na Glas Leitire, by James Fenton*





**Date for your diaries!**

## **SWLG 2018 AGM**

Following last year's well attended and enjoyable AGM we are revisiting the same venue:

**Birnam Arts and Conference Centre, Dunkeld  
Saturday 1<sup>st</sup> December at 2pm**

After the formal business of the AGM there will be a short refreshment break (pretty good cakes), and then there will be a discussion around aspects of Wild Land, led by Helen McDade of the John Muir Trust. The precise field for discussion will be decided later, depending on what is current news at the time.

Before the AGM some of the Steering Group will enjoy a "walk and talk" in the vicinity of Birnam, so join us if you can. Meet at the Birnam Centre at 1030am; friends and family welcome. The walk will be followed by lunch at the centre.

Nearer the time the Agenda and the draft minutes of the 2017 AGM will be posted on our website, together with any last minute changes, so do keep an eye on [www.swlg.org.uk](http://www.swlg.org.uk). We will probably also send out electronic details to those members who have completed their GDPR return stating that preference.



James Fenton

## Editorial

I have been reading a book recently entitled *The Lake District and the National Trust* by B.L.Thompson, published in 1946. The first chapter makes for an interesting read. It is called 'Preserving the Lake District' and starts with a quote from Charles Langbridge Morgan writing in the *Times Literary Supplement* in 1941:

A thing of value, whether it be a work of art or a glory of nature or a happy relationship of love or friendship between human beings, is to be valued in two ways; first for its own sake, absolutely, for the beauty and the good that we perceive in it and enjoy; and, ultimately, for the reality or essence of which its appearances make us aware – “a motion and a spirit that ... rolls through all things.”

This viewpoint is a contrast to the dominant view today where accountants and economists rule, and society will only accept the preservation of the 'glory of nature' if a cost-benefit analysis shows it to be economically beneficial. Think of all the times that those arguing for the conservation of the Highland landscape are denigrated for being

against the economic wellbeing of the local populace.

B .L. Thompson in this book makes many points which are as relevant today as they were in 1946, and not just to the Lake District. He states in relation to the scale of any proposed new development: “Where nearly everything is so nearly in perfect proportion you upset it at once if you widen a road from fifteen feet to forty ... or send electric pylons marching across the a valley. **We shall get used to them in time, yes, but we will have lowered our standards of beauty in the process.**” [emphasis added] As we steadily fill up Scotland's upland landscapes with the clutter of tracks, dams, wind-turbines and industrial infrastructure, we are undoubtedly forced to accept just such a lowering of standards.

In recent years there has been much debate about the intrusion of new pylons – think the Beauty-Denny line. This is not a new issue, for Thompson states: “Are the local people to be denied electric light and power, it is asked, merely because societies of long-haired aesthetes think the poles or pylons

will be an eyesore? Put this way, the question suggests that societies are unreasonably obstructive ... But if it is to be accepted that such things are really rather out of keeping with nature in her more perfect forms then the only solution is to put them underground. Of course it is costly to do this ... Here is a national heritage, and the price of maintaining its pristine condition should be a charge to the nation.” Is Scotland willing to pay the costs necessary to conserve its internationally-recognised landscapes, the virtues of which the Government is forever extolling?

There is a short article in this issue of *Wild Land News* where Drennan Watson concludes that the upland Scottish landscape is less able to withstand the visual intrusion of infrastructure than the Alps. Again, this problem was realised by Mr Thompson: “In the Alps no man can seriously mar the magnificence of the scenery because it is so vast. In

the Cumbrian fells a single mine or quarry may ruin the scale of the landscape and wreck its natural beauty.”

Mr Thompson also has something to say in regard to landowner rights. Referring to the planting of conifers by landowners at the end of the 18<sup>th</sup> century he says: “There was an outcry from the lovers of picturesque beauty who thought then, as we think now, that the natural state of the scenery is so perfect that even private freedom for a man to do as he likes with his own property should be subservient to its preservation.” Do we believe this today? That the freedom of landowners, including community landowners, should at times be subservient to wider society’s wish to preserve the landscape as found?

In my article below, I have chosen the Torridon Mountains to illustrate how wildness has declined in the area over the past 100 years, and

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The price of maintaining pristine condition of our national heritage should be a charge to the nation

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Below Ben Cruachan



Crummock Water in the Lake District:  
a mix of the natural and the cultural

how attrition of wild land, as elsewhere in Scotland, continues to this day. In addition to hydro-schemes and tracks, I have included the change to designed landscapes we are creating through woodland planting.

I would argue that the Torridon area contains one of the most natural vegetation patterns remaining in Europe, in that, until these woodland schemes, it has not been designed since the world began: it is wild. Although the area does host one of the most interesting and beautiful relict areas of native pinewoods in Scotland, the Glas Leitire woods by Loch Maree, research indicates that their natural decline started 7,500 years ago. We just happen to have inherited a rare and declining habitat.

I of course realise that not everyone will agree that planting new native woods in wild land causes attrition of wildness: there is much debate to be had here in the future. Interestingly, B. L. Thompson says with regard to the landscape of the Lake District: “If we could revert to completely natural scenery we should undoubtedly find it dull and forbidding.” [on the assumption it would all be forest].

The natural moorland vegetation of the Torridon area could be termed ‘dull and forbidding’ and adding trees to it would certainly make it less dull. But less wild? ... Or more wild?

*Photos: James Fenton*



Drennan Watson

## Windfarms and the Scottish landscape

Windfarms are a particularly difficult issue, I think, to which the Scottish upland landscape is particularly vulnerable for various reasons. In the Alps and most mountain ranges, which are fold mountains, there are everything from very high to medium height hills/mountains and a windfarm stationed on a lower hill/mountain has plenty of altitude to capture wind but its profile can be partly lost against a background of higher hills/ mountains or screened off by them.

Scottish hills/mountains were all cut out of an uplifted peneplain (a gently rolling almost featureless plain). Hence the altitudinal range is much more limited. I think that is why you do not have to climb far up

Scottish hills to find far panoramas opening to your view. This is one of the under-appreciated assets of the Scottish landscape but increasingly including more and more windfarms!

In the central belt, the hill ranges are mainly block mountains sticking up out of the rift valley lowlands and hence with highly visible skylines over long distances. They also do not have significant summit plateau areas on which windfarms could be concealed from below.

It always seemed to me also that windfarms are almost designed to have the maximum conflict with the landscapes in which they are set in Scotland. Impact is due to a combination of features I think like



dominance – which goes back to scale (massive individually and collectively in a windfarm) and positioning (high in dominating positions in the landscape).

The other parameter of impact is from the message of a structure. Some of the ‘memorials’ to past landowners attract animosity because they combine these three features – scale, dominating position and message (I am your laird/lord, for example the Duke of Sutherland memorial). It is interesting that ‘The Angel of the North’, which is similar in scale and location to a windfarm pylon does not attract more criticism, but the message of an angel is about ‘welcoming’ – powerful but friendly guardians at the entry to a special place.

Windfarms seem to transmit a very different message of aggressive industrialisation of wild land, hard and vertical among the clean lined curves of Scottish hills. It is interesting that, in the Swiss Alps, if they are thinking of developing in an area next to a wild area, the rule is that the skyline belongs to the wild area.



### **Have you completed your GDPR return for SWLG?**

The General Data Protection Regulation came into effect on 25<sup>th</sup> May, and SWLG has circulated all members to ascertain how you would like us to contact you. Our privacy and data handling policies are on our website.

If you have not yet replied by letter or email, we would really like to hear from you, including your up to date address, postcode, email address (if you have one), and stating your contact preference.

It has emerged that several members have changed addresses, and that we do not hold as many email addresses as we would like. One good result has been that much of this has been rectified, and many members took the opportunity to send us enthusiastic and supportive messages.

So, if you haven't yet sent us your preferences then please do so to [admin@swlg.org.uk](mailto:admin@swlg.org.uk), or write to us. In the meantime, we will not be chasing up any missing responses as we do not have the resources to do so. In this case, we are assuming that as you have already supplied us with this information and paid your subscription you are expecting to hear from us occasionally. Should you wish to opt out of receiving occasional emails or should your address change then please advise us.

Beryl Leatherland

## The next generation of windfarms

The Scottish Environment LINK Landscape sub-group recently hosted an absorbing but in part concerning presentation about emerging plans for the further development of the wind industry as the first generation of wind farms comes to the end of its predicted life cycle. Here, I report what we learned in that meeting and add some thoughts of my own.

### **Re-powering existing turbines**

Many SWLG members will be aware that there has been work done and literature produced on re-commissioning, re-powering and so on in recent years, and that operators were preparing detailed proposals. I had assumed that this would involve improvements to the existing turbines, such as more efficient nacelles and more aerodynamic blade designs . The

original towers and their concrete bases would remain, maybe extended to make them a little higher, but there would be little additional visual impact as a result of upgrades across the industry. It appears that this is a pretty naive expectation! Instead it seems that re-powering will involve a total upgrade of all existing infrastructure, plus substantial new infrastructure being put in place.

Developers will submit re-powering proposals some time before existing consents expire, presumably so that there is time for scoping opinions and applications to be submitted, together with all the procedures involved in the progress of a major application through the planning process.

There have been many technical and engineering advances made since the early windfarms were built. Back then, turbine sizes around 1MW were commonplace, larger ones were 2MW. Now there are commercially available 7.5MW onshore wind turbines from a company called Enercon; this has a hub height of 135m and blade diameter of 127m, with a tip height






of 198m. Even larger offshore turbines are now being built, some with blade diameters over 150m, and it may be that this sort of size will in due course move onshore. The direction of development, towards ever larger turbines with a lower building cost per MW of generating power, appears unstoppable. These larger turbines will inevitably need larger foundations, and a greater spacing between them, so the existing windfarm footprints will become obsolete. If the upgraded wind farms are built on the same sites as now they will need completely new concrete bases and probably additional access roads. The original sites may be inadequate for this type of upgrade and a much bigger area of land is likely to be desired. The reality will be that with larger and more dominant turbines on extended sites [where possible, depending on land ownership boundaries] there may well be even more dramatic landscape impacts,

especially on distant views, than we have come to expect so far.

### **Siting**

Onshore windfarms are currently a cheap way of generating relatively low-carbon renewable energy and we must decarbonise our energy production systems, so we have to have them, but they need to be sited in appropriate places, not where they're visible from our precious wild land areas. I occasionally pass by the wind farm adjacent to the petrochemical complex at Mossmorran in Fife and this is the sort of windfarm site which is welcome. There are many other out-of-town industrial areas around Scotland where turbines would not appear to be too out of place. Development should be on such sites rather than increasing the size of existing farms which often border wild land, as the larger new sites would then be a further detriment to the landscape.



Will the redeveloped farms target the same total output as before or is it more likely that there will be applications for a similar number of larger turbines? Whatever your views on the importance of wind turbines to the renewable industry and their effectiveness and contribution to reducing the progress of global warming in the overall scheme of things, and however precisely these factors can be reliably evidenced, this could be bad news for our landscapes.

### **New planning applications**

The only bright area on the horizon is that the Scottish Government has decided to treat each re-powering proposal as a new full application, so a new Strategic Environmental Assessment will be required and there should be full public consultation – depending perhaps on the outcome of the current Planning Bill – in which it seems that overall there will be a reduction in public participation at key stages. Ideally there would also be some expectations on restoration work to be conditioned in consents, but we have had unsatisfactory experiences of that requirement to date in Scotland.

There are countless questions and concerns around this process. One key issue is the baselines to be used for assessment, and what survey work will be required. New surveys may be required as some original data (such as ecological surveys,

anemometer measurements, visual impacts) may have changed over time from the submission of the original application, but will developers expect to use original survey data which would be more cost effective for them?

### **Civil Aviation Authority**

The Civil Aviation Authority (CAA) requires that all structures over 150 metres high must have a steady red 2000 candela source intensity, so if there is a wind farm with a large number of turbines this may well contribute significantly to local light pollution which may affect nearby communities, especially where there are several wind farms in any particular area.

This is already a problem where there are existing requirements for all turbines in the vicinity of airfields to be illuminated. In these cases infrared lighting is used which can be seen by pilots of military aircraft because they wear appropriate goggles. This level of lighting may also influence wildlife in various ways. Potential effects on migration precision, nocturnal predator behaviour and hunting success and reproduction cycles have not yet been adequately studied.

There are radar activated lighting solutions available on the market which only light up as aircraft approach but this would be an expensive alternative option on this



scale. Will the lighting requirements encourage developers to submit proposals for turbines that are marginally less than 150 metres tall?

### **Life cycle analysis**

In the meantime, we continue to have no idea of the carbon cost of building turbines, importing them to Britain, mining the various materials used, including the rare-earth and other metals used in the various components, the construction costs, CO<sub>2</sub> emission reduction data (compared with other forms of electricity generation) and so on. To be able

for a couple of years now and is one more aspect of our future that LINK is working on promoting, it's just that here in Scotland we haven't actioned it yet. To my mind we seem to be a long way from doing so.

Wind turbine blades are made of composites, such as resins of glass fibre reinforced polyester, or epoxy or of carbon fibre reinforced epoxy. These materials give them lightness, rigidity and resistance to torsion and fatigue. How would such complex composites be recycled or re-used? I have emailed a major manufacturer in Denmark

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### ***The direction of development towards ever larger turbines appears unstoppable***

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to consider this fully there needs to be a proper Life Cycle Analysis (LCA) completed covering the host of processes involved from mining to eventual decommissioning and balancing that with realistic figures for carbon emission savings.

Increasingly we will expect the materials and components used by manufacturers to follow the essential reduce, reuse, recycle, mantra necessary if we are to have a sustainable future. All manufactured products must in the future be expected to compliment the aspirations of the Circular Economy. Yes, we have a Circular Economy policy in Scotland, it was consulted on and has been around

about this but to date have not received a response.

To their credit, some car manufacturers are already working on these aspects of their industry as part of their decision making processes in evaluation of the timing of bringing in different propulsion and manufacturing materials and systems into their fleets. It should not be beyond the skills and abilities of the wind industry, among others, to do that too in order to enable decision makers and their advisors to accurately assess and plan appropriately for the future.

*Photos: James Fenton*

John Mayhew

## The Role of National Parks in Protecting Wild Land

Scotland's first two National Parks include substantial areas of wild land. Both Parks have in place Partnership Plans which commit them to protecting and enhancing those areas. More National Parks would bring even greater benefits for wild land protection. This article sets out the current campaign for more National Parks and explores the role of National Parks in the wild land debate.

In 2013 the Scottish Campaign for National Parks (SCNP) and The Association for the Protection of Rural Scotland (APRS) launched our landmark joint report *Unfinished Business* (1). This called on the

Scottish Government to prepare a strategy for designating more National Parks in Scotland, and proposed seven areas considered worthy of this accolade (see map on page 16):

**Ben Nevis/Glen Coe/Black Mount  
Cheviots  
Coastal and Marine National Park  
Galloway  
Glen Affric  
Harris  
Wester Ross**

SCNP and APRS have campaigned vigorously for more National Parks ever since, and community and political support has grown

Cairngorms National Park. Photo: James Fenton



Loch Lomond & The Trossachs National Park. Photo: James Fenton



substantially, but five years on the Scottish Government continues to resist designating more than two.

### Why Should Scotland Have More 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 provide essential habitats for our rich array

of internationally important wildlife. They are one of the main reasons why people visit Scotland, so they support important economic benefits through tourism, our largest industry.

With landscapes of such quality you might expect Scotland to have several National Parks – the principal mechanism used across the world to safeguard and manage fine landscapes according to international best practice.

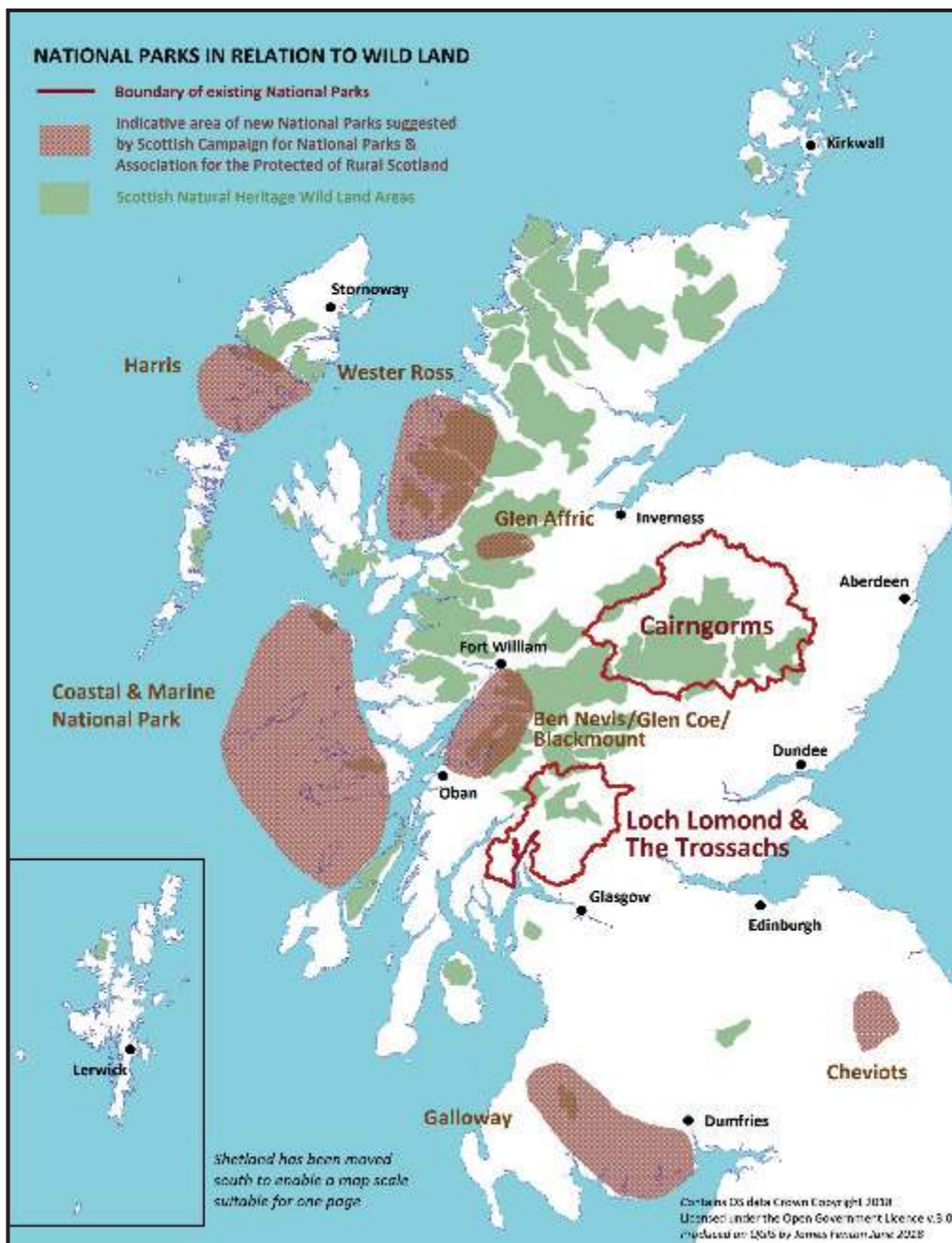
However, although the world has over 3,500 National Parks (including for example 60 in Canada, 29 in Norway and 14 in New Zealand), Scotland has only two, both quite recent.

Scotland's first two National Parks have achieved a great deal in their first 15 years and represent

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Scotland's  
first two  
National  
Parks  
inspire pride  
and passion  
amongst  
local people

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For more information on the Wild Land Areas see *Wild Land News Issue 91*, or the landscape policy pages of Scottish Natural Heritage's website





remarkable value for money. They inspire pride and passion amongst local people and visitors and provide many benefits both to local residents and visitors and to Scotland's landscapes and biodiversity. National Parks generate a clear focus on a particular area, support its active management as well as its protection, encourage integrated planning and delivery by all public bodies, are invariably permanent while other arrangements come and go, and invest additional national resources in an area in recognition of its national importance.

SCNP and APRS therefore continue to campaign for the Scottish Government to show leadership on

this issue, and to support the efforts of local campaigners, by delivering a national strategy for future National Parks in Scotland. 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 by protecting more extensive landscapes and wildlife and would support our crucial tourism industry.

### **Political Support**

In 2015 we submitted a formal Petition with over 1,100 signatures to the Scottish Parliament calling for more National Parks. We presented oral evidence to the Public Petitions Committee at

Holyrood, where MSPs gave us a positive reception and asked several relevant questions. The Scottish Wild Land Group's formal support for our petition was greatly appreciated; support also came from the John Muir Trust, Mountaineering Scotland, National Trust for Scotland, RSPB Scotland, Ramblers Scotland, the Scottish Wildlife Trust and Woodland Trust Scotland. However, the Committee ultimately decided to close our Petition without further action, possibly because the 2016 election campaign was fast approaching.

During the run-up to the Scottish Parliament elections in May 2016 we put our case to all the political parties. The successful result was that the Conservative, Green, Labour and Liberal Democrat manifestos for those elections all supported more National Parks, so a majority of MSPs (65 out of 128) now represent parties which support our case.

In 2017 we once more took our case directly to Holyrood, with a three-day exhibition and an evening Reception in the Scottish Parliament attended by over 100 people, including about a dozen MSPs, and addressed by the Director of the Europarc Federation, the European network of protected areas. A supportive Parliamentary Motion then led to a Members' Debate in the main chamber at Holyrood, during which

Conservative, Green and Labour MSPs all spoke passionately in favour of more National Parks. We have met every one of the Scottish Government's Environment Ministers over the last five years, seeking to persuade them of the benefits which more National Parks would bring to Scotland.

### Topic Reports

During 2015–2016 we researched and published four detailed reports on those topics covered in *Unfinished Business* which had raised the most interest:

- Socio-Economic Benefits (2)
- Possible Governance Models (3)
- Tourism benefits (4)
- Volunteering opportunities (5)

The Socio-Economic and Tourism reports describe the wide range of benefits which National Parks bring to the areas they cover. The Governance report sets out why creating more National Parks need not be unduly complicated or expensive, as National Parks in remote less populated areas of Scotland such as Glen Affric in the Highlands or the northern Cheviots in the Borders would have smaller budgets, staffing and governance structures than our two relatively large and complex existing National Parks. Copies of all these reports are available on request or can be read on our website. We may publish further such reports in the future, such as on land use, housing or finance.

## Local Campaigns

However, the most significant development in the last five years has been the emergence of lively local campaigns for National Parks in both the Borders and Galloway, with enthusiastic policy, technical and financial support from SCNP and APRS. The Campaign for a Scottish Borders National Park published a major independent *Feasibility study for a proposed Scottish Borders National Park* (6) in September 2017 and is currently discussing this with all relevant stakeholders, particularly Scottish Borders Council.

The Galloway National Park Association (GNPA) was formed in 2016 and has secured the support of Dumfries and Galloway Council (DGC) and of the Galloway and Southern Ayrshire Biosphere Partnership Board. In 2016 DGC

commissioned the report *A Galloway National Park ... ?* (7) from the Southern Uplands Partnership, and in 2017 GNPA published its own discussion paper *A National Park in Galloway?* (8), which it is now discussing with all relevant stakeholders.

Then in 2017, to our surprise and delight, Argyll and Bute Council announced that it was exploring the potential to create a coastal/marine Argyll and Islands National Park through the *Main Issues Report* (9) for its new Local Development Plan. This initiative effectively revived the proposals for Scotland's first Coastal and Marine National Park developed by the then Scottish Executive in 2006-2007. SCNP and APRS supported this proposal, as did several other national organisations and local members.



River Bladnoch from Kirwaugh Moor: could be in a new Galloway NP. Photo: Alan Wake

We also keep in touch with local people and organisations interested in the potential of National Parks in the other four areas identified in *Unfinished Business*: Ben Nevis/Glen Coe/Black Mount; Glen Affric; Harris; and Wester Ross.

### Communications

We have benefited greatly from the enthusiastic support of the *Scots Magazine*, which has printed articles about our campaign almost every month since 2016. Our campaign has featured extensively in the Scottish media, including on BBC Scotland's *Landward* TV programme and BBC Radio Scotland, as well as features and editorials in *The Herald*, *The Scotsman*, *The Courier* and the *Press and Journal*.

### Wild Land and National Parks

So why should SWLG members support more National Parks? Wild land was one of the many natural and cultural heritage attributes used to select our first two National Parks and to define their boundaries, alongside for example biodiversity, recreational opportunities and cultural heritage. This would no doubt be the case for any future National Parks in Scotland. So, while wild land may not be the principal reason for designating National Parks, it is undoubtedly one of the special qualities which would be given greater focus, attention and resources by the establishment of more National Parks.

### Wild Land in existing National Parks

There are substantial overlaps between existing National Parks and Wild Land Areas (WLAs) – see map on page 16. The Cairngorms National Park incorporates nearly all of the Cairngorms WLA and the Mount Keen–Lochnagar WLA along with small portions of two other WLAs. The Loch Lomond and the Trossachs National Park incorporates all of the Ben More–Ben Ledi WLA, most of the Ben Lui WLA and some of the Breadalbane–Schiehallion WLA.

The 2017 *Cairngorms National Park Partnership Plan* highlights wildness as one of the key special qualities of its area:

*The Cairngorms National Park is one of the best places in the country for nature. This is where we find some of Scotland's wildest land, arctic-like mountain plateaux and Scotland's most extensive semi-natural pine forest*

...

*The Cairngorms National Park is ... an accessible place of 'wildness' for enjoyment, activity and learning.*

Policy 1.3 of its Conservation Policy Framework makes a specific commitment to enhancing wildness:

*Conserve and enhance the special landscape qualities with a particular focus on:*  
*a. conserving and enhancing wildness qualities;*

There are substantial overlaps between existing National Parks and Wild Land Areas





- b. maintaining and promoting dark skies;*
- c. enhancements that also deliver habitat improvements;*
- d. enhancing opportunities to enjoy and experience the landscapes of the Park;*
- e. applying a presumption against new constructed tracks in open moorland.*

The 2018 Loch Lomond and the Trossachs National Park Partnership Plan also highlights wildness as an important special quality:

*Land use change needs to respect important landscape characteristics such as wild land qualities or important historic landscape and cultural heritage features.*

*Its special landscapes include lochs, coastlines, forests and striking contrasts where the lowlands and highlands meet, with significant areas in the north still retaining a wilder feel.*

Conservation Priority 2.1, Landscape and Heritage makes the following commitment:

*The National Park Authority, and its partners, will work to conserve and enhance the special landscape and cultural heritage qualities of the area by ensuring that developments and projects recognise the need to protect and, where possible, enhance the qualities of wildness, tranquillity, dark skies and the historic environment.*

Map 3, Special Landscape Qualities, shows the areas of the National Park with wild land attributes and states:

*We will enhance the National Park's special landscape qualities and enjoyment of them by protecting wild land qualities, particularly in upland areas.*

In summary, respect for and commitment to wild land and qualities of wildness is fundamentally integrated into the understanding, analysis and policies of both existing National Park Authorities (NPAs) in a way that cannot be said for most local authorities, and the same would

almost certainly apply to any future NPAs.

### **Wild Land in potential National Parks**

There are also substantial overlaps between our seven proposed National Parks and Wild Land Areas – see map on page 16. Exactly how many WLAs would fall within each would depend on the precise

The greatest threats to wild land in Scotland currently come from the growth of wind and hydro energy developments. The National Parks Act makes no specific reference to energy developments, but current *Scottish Planning Policy (2014)* states clearly that wind farms will not be acceptable in National Parks or National Scenic Areas. Wild Land Areas, however, are included in the

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### ***If you want to protect wild land in Scotland, you should support our campaign for more National Parks***

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boundaries established as part of the designation process, but an initial estimate suggests the following likely scenario:

<b>Proposed NP</b>	<b>No. Wild Land Areas</b>
Ben Nevis/Glen Coe/ Black Mount	2
Cheviots	0
Coastal and Marine National Park	2
Galloway	1
Glen Affric	1
Harris	1
Wester Ross	4

However, protecting and enhancing our precious resource of wild land involves not only actively supporting measures which would enhance it but also opposing developments which would damage it.

lesser category of “areas of significant protection” in which “wind farms may be appropriate in some circumstances”.

The result of this is that there have been no significant planning conflicts over wind farms in National Parks since 2014, whereas in the same period there have been several bitter battles over proposed large wind farms in Wild Land Areas, with some given the go-ahead by local planning authorities or by Scottish Government Reporters.

It seems to me that the message is clear: if you really want to protect wild land in Scotland, you should actively support our campaign for more National Parks.

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**APRS**  
The Association for the  
Protection of Rural Scotland

APRS is campaigning jointly with the Scottish Campaign for National Parks (SCNP) for the Scottish Government to designate more National Parks.



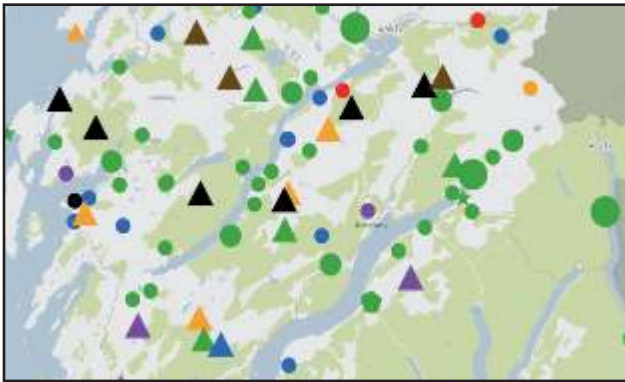
*John Mayhew is Project Manager  
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Strategy Project*

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[scnp.aprs@gmail.com](mailto:scnp.aprs@gmail.com)  
<http://aprs.scot/projects/scottish-national-parks-strategy-project/>

## Local authority maps of renewable energy developments

Highland Council now has an interactive map showing all hydro-schemes built or planned in Highland Region, accessible from the Council's website. An extract is given on the right.



Argyll & Bute Council has a map showing all renewable energy projects within the region, accessible from the Council's website. An extract is given on the right

*Below: A typical example of a new run-of-river hydro-scheme with dam, track and power-house. Kingairloch, Morvern. Photo: J Fenton*



## Wildness in Torridon: A Case Study

### A. HYDRO-ELECTRICITY

#### Hydro-scheme plan withdrawn

In 2016 a planning application was submitted for a hydro-electric scheme south of Badachro (Gairloch) on the north side of the Torridon Mountains in Wester Ross (Highland Council planning ref. 16/03353/FUL). This included a dam on Loch Gaimeamhach (C on Map 2, page 29), the creation of a new access track along the line of an existing path, a buried pipeline and power station.


However in June this year it was announced that the developer had withdrawn the planning

application. It is not known whether this is permanent or whether a revised application will be put forward at some stage.

The Scottish Wild land Group submitted an objection to this scheme, as did the John Muir Trust.

#### The SWLG objection

The Scottish Wild land Group objects to the above scheme owing to its impact on the Special Qualities of the Wester Ross National Scenic Area and on the wild land qualities on Core Wild Land Area No. 27 Flowerdale-Shieldaig-Torridon.



Lochs a’Bhealaich (nearest), a’ Ghobhainn (middle) & Gaimeamhach (back left) from Ben Alligin; Baosbheinn is the mountain on the right and Gairloch is visible in the distance. The recently withdrawn hydro-scheme involved L. Gaimeamhach (C on Map 2). The other two lochs were included in the original Shieldaig hydro-scheme rejected by the the Scottish Executive in 2003 (D on Map 2).



Indeed it is surprising that such an application has been submitted bearing in mind that it is in the same locality as the previous ‘Shieldaig Hydro Scheme’ which the then deputy environment minister, Lewis Macdonald, turned down after a public inquiry, stating: “In this instance the potential impact of this scheme, now and in the future, on an area of national and international significance is simply too high and outweighs the potential benefits.”

The scheme is planned within an area which has always been renowned for its landscape quality. It was recommended as a National Park in 1945 by the Ramsay Committee, and remained a National Park Direction Area until replaced by the NSA designation in 1980. It lies within the ‘Mountain Core’ as identified within the suggested Wester Ross National Park in the then Countryside Commission for Scotland’s ‘The Mountain Areas of Scotland: Conservation and Management’

1990 report (commissioned by Scottish Ministers). It is also recognised as being of national importance in the 2012 Highland Wide Local Development Plan for its natural heritage qualities.

### **National Planning Policy**

The Government’s 2014 Scottish Planning Policy states:

“212. Development that affects a ... National Scenic Area ...should only be permitted where:

- the objectives of designation and the overall integrity of the area will not be compromised; or
- any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”

The SWLG group believes that it cannot be argued that one small hydro scheme is of such national importance that it should override the long-recognised national importance of the area in landscape terms. Additionally, when taken

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The scheme is within an area which has always been renowned for its landscape quality

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The Torridon Mountains: Beinn Dearg & Ben Eìghe from Ben Alligin



The recently completed R. Grudie hydro-scheme (E on map 2)

with the all the other run-of-river hydro schemes under construction or recently completed within Wester Ross, SWLG believes that the integrity of the NSA is under threat.

“200. 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. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas.

“215. In areas of wild land ... development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.”

SWLG believes that the significant effects of the scheme as identified in the developer’s ‘Landscape and Visual Impact Assessment’ cannot be substantially overcome.

The fact that there will be a number of both ‘Moderate’ and ‘Heavy’ impacts [as listed in scheme’s own Landscape & Visual impact Assessment] indicates that this is the wrong location for this type of development. Note also that evidence does not support the bald statement in the assessment that “the landscape is in fact unnatural due to thousands of years of man’s influence.” Evidence would suggest that this is in fact one of the most natural landscapes remaining in Scotland with minimal human interference over the millennia: the ‘naturalness’ is not only perceived but real.

The section ‘4.6.2 Cumulative Impacts’ on Landscape character and Wild Land Attributes’ misses the point that with the recent

plethora of hydro schemes in Wester Ross, including the ones noted in the cumulative impact map, there is a general attrition taking place of the special qualities of both the NSA and wild land within it.

### Other responses to the development

Although Scottish Natural submitted a formal objection to the proposal, it did not object in principle to the scheme, concluding that, with suggested mitigation measures “it should be possible to develop the scheme with minimal long term impact on either the special qualities of the NSA or the characteristics and attributes of the WLA.”

Interestingly the Scottish Environmental Protection Agency (SEPA) did not believe that adverse impacts to the water quality could be mitigated and maintained its objection to the scheme.

It would appear that SNH, the government agency with responsibility for landscape, unlike SEPA, is reluctant to object to any hydro-electric scheme. It did not, for example, object to the recently built River Grudie hydro-scheme which has resulted in a new vehicle track and dam into the same Wild Land Area (E on Map 2). Another run-of-river of river scheme together with a new access track has just been completed on the Badachro river (F on Map 2).

The Gairloch Community Council did object to the scheme as presented, although not in principle to a hydro-scheme in the area. However they did note “that whilst they feel sure the developers will ensure the visual impact of this proposed Hydro scheme will be as low as they can possibly make it, they felt it worth noting that the ever increasing number of schemes in this area, will, even with care, reach a saturation level where the area can no longer be deemed to be ‘wild land’!”

### The earlier Shieldaig hydro scheme

The above scheme is in effect a scaled-down version of the Shieldaig Hydro Scheme which was a *cause célèbre* amongst the mountaineering and hillwalking fraternity at the beginning of the millennium. This would have involved the damming of four lochs in the area (those marked D on Map 2) with associated pipes, tracks and power-houses. Although planning officials recommended rejection of the scheme, Highland councillors voted it through. However, this proposal was eventually turned down in 2003 by the Scottish Executive owing to the national and international significance of the landscape.

### Other hydro schemes in the Torridon area

The oldest scheme in the area, dating from 1952, is in Kerrysdale, beside the road between Loch





**Map 1.** Access into the Torrordon Mountains in 1921. The Torrordon area as defined here is the area bounded by the tarred roads.



**Map 2.** Access into the Torrordon Mountains in 2018. Hydro-schemes: **A.** Loch Bad na Sgalaig/River Kerry (1952). **B.** Loch Garbhaig scheme (upgraded 2012). **C.** Loch Gaineamhach (withdrawn June 2018). **D.** Shieldaig hydro-scheme (rejected 2003). **E.** River Grudie scheme (2017). **F.** Badachro River scheme (2018).

Maree and Gairloch, which includes a dam across Loch Bad an Sgalaig (A on Map 2). This results in an obvious draw-down zone around the loch in dry weather. There is a more recent smaller scheme at Loch Garbhaig above the Victoria Falls (B on Map 2).

## B. LONG-TERM ATTRITION OF WILD LAND

### Access and structures

The Torridon area as defined here is the area bounded by the tarred roads as shown in Map 1 (page 29). It has long been recognised as being of high scenic value, with dramatic mountains such as Liathach (see back cover), Beinn Eighe and Ben Alligin (see picture on page 26) rising straight up from the surrounding moorland. Owing to the infertility of the soils, it has remained uninhabited beyond the roadside fringes and even shieling sites are few.

Map 1 shows the extent of paths in 1921 (from the Ordnance Survey one inch map): coastal paths linking communities in the west and stalking paths into the hills. Other than these, buildings and structures were absent.

Map 2 shows the situation today, with two footpaths converted to vehicle tracks and three new vehicle tracks associated with the hydro-schemes discussed above. The two lochs with dams and draw-down zones are also shown (A, B). Note that any extended mountain

paths since 1921 have not been mapped.

### Vegetation changes

Apart from the immediate vicinity of Redpoint, there is no improved agricultural land within the area, the whole landscape consisting of moorland vegetation of low nutritional value which has never been ploughed, cropped or enclosed – or designed to be a specific vegetation type. The only land use has been extensive livestock grazing, deer stalking and fishing. In recent years, sheep have become virtually absent.

Map 3 (page 21) shows the extent of woodland in 1921, both natural and planted. The main areas of native woods were the Glas Leitire pinewoods below Meall a'Ghiubhais at the south end of Loch Maree (see photo on inside front cover) and various stands of birch (and oak) south of Badachro in the northwest. By 1921 the Forestry Commission had established commercial plantations in the Slattadale area to the northeast, and there were some pine plantations around Torridon House to the south.

Map (page 29) 4 shows the extent of woodland of all types as shown on the Forestry Commission Woodland Inventory of 2016. The main changes have been significant new plantings of native species on the Gairloch Estate (A on the map); crofter forestry and other woodland schemes in the Diabaig

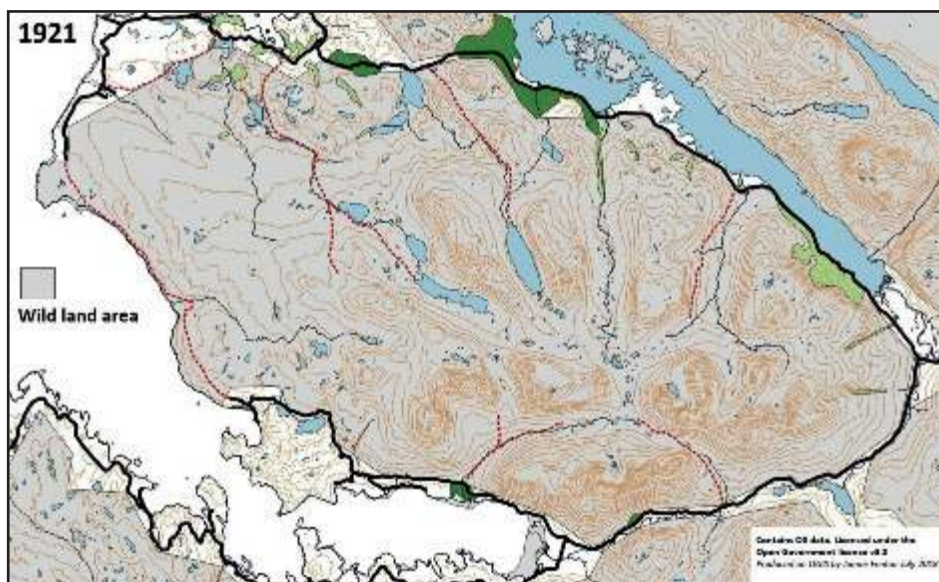




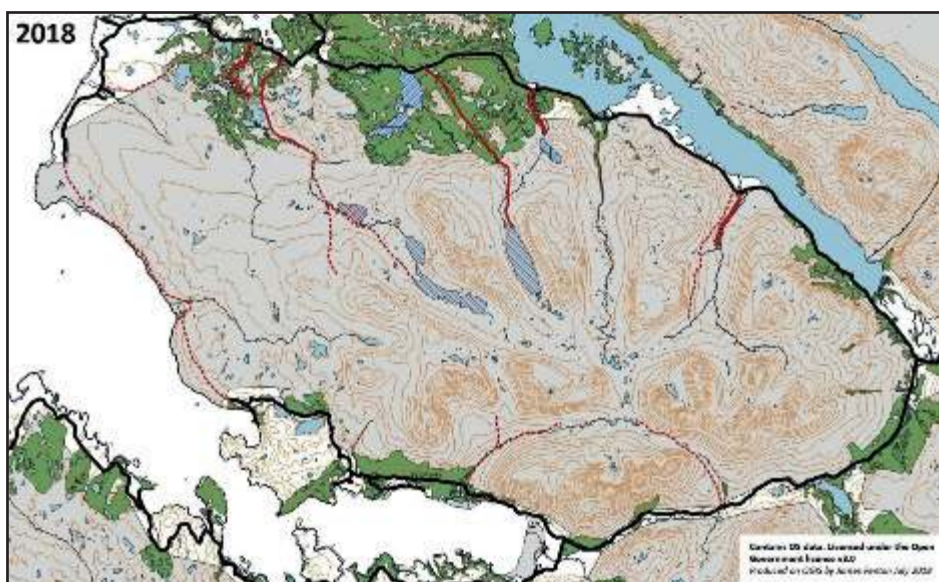
**Map 3.** Balance of woodland and moorland in 1921. Woodland data from 1921 one inch OS map. Any area not mapped as woodland comprises a mosaic of open moorland vegetation types. The Glas Leitire native pinewood is the area at the south end of Loch Maree.



**Map 4.** Balance of woodland and moorland in 2016. Woodland data from Forestry Commission Woodland Inventory. All woodland mapped here post-1921 has been planted (new native woodland plantations).  
**A.** New native woodland on the Gairloch Estate. **B.** Crofter forestry and other new planting schemes.  
**C.** Areas of native tree planting within the SNH Beinn Eighe ring fence. **D.** Various plantings of native trees, including restructuring of an existing commercial plantation.



Map 5. Wild Land Area 27 (Flowerdale-Shieldaig-Torriddon) in 1921.



Map 6. Wild Land Area 27 (Flowerdale-Shieldaig-Torriddon) today.



and Inveralligin areas (B); areas of native planting within SNH's ring-fence south of Beinn Eighe (C, not mapped); other plantations in the Kinlochewe area, including a now-restructured commercial plantation and native pinewood plantings (D).

These new plantations generally involve mounding (creating small planting sites with a digger), deer fences and unconstructed access routes for small vehicles.

### Attrition of wild land

Maps 5 and 6 (page 32) compare all these changes over the last 100 years. It can be seen that the main changes have been:

1. The encroachment of vehicle access into the core mountain area
2. Loss of wild rivers (dams and pipes), and new power-houses
3. The change from a wild to a designed landscape (tree planting areas)
4. Significant lengths of new deer fences (around plantations)

Torrordon has perhaps to date got off lightly compared to some other of the mountain areas of Scotland, but the trends even here illustrate what is generally going on throughout upland Scotland. One difference, though, is that being within a National Scenic Area, windfarms are unlikely.

A new native pinewood above Am Feu-Loch (at the start of the track to Loch na h-Oidhche).



Mounding for tree planting at Inveralligin, above Loch Torridon, disturbing 10,000 years of soil development.



Close-up of mounding for tree planting at Inveralligin. Such mounding allows trees to be established in places they might otherwise be unwilling to grow. Such planting schemes also involve the construction of deer fences.



Beryl Leatherland

## SWLG objection to Cairngorm artificial ski slope

The Cairngorm ski centre submitted a planning application for an artificial ski slope above the main car park at Coire Cas at an altitude of 635m (application reference 2018/0112/DET). The Scottish Wild Land Group sent a letter of objection to the Cairngorm National Park Authority's planning team on 29 March 2018.

The letter states: "Our grounds for objection are concern over landscape impacts, the potential for damage to natural features, the lack of confidence that a quality

development will result and concern over the appropriateness of the proposal and its justification in this location. In addition there has been inadequate consultation."

*The full letter can be found on the SWLG website. It has since emerged that there are some unresolved matters associated with this development, in particular whether an EIA is required as the National Park believes. We await clarification.*



Site of proposed ski slope. Photo: James Fenton

## Lust for the eyes

Here are two examples of somewhat inappropriate behaviour in wild land that I've displayed in recent months:

1. Maybe it's something about living amongst the high, rounded hills and long glens of the Cairngorms, but I find that, on reaching a summit, I speed up, practically racing to the top to see the view. Unable to contain my excitement, on this occasion I left my fellow traveller in my wake, ploughing through snow fields, arriving several minutes before him. Then, concerned about getting cold, I was impatient to leave once he had caught up.

2. Back in February I set about getting photographs of mountain hares. Coming across a particularly fine specimen dozing on the edge of a snow patch, I set about stalking closer and closer. Eventually I passed beyond the threshold of what the hare was comfortable with, and he bounded off, looking somewhat annoyed by the incident.

Both of these trivial events evoked in me that uneasy, English sense of

embarrassment that comes from upsetting social convention. It was, as Mr Knightley says to Emma, 'badly done'. Disturbing a mountain hare from its repose may seem like a minor infraction of politeness compared to, say, mass-culling them. Likewise, leaving someone behind for a few minutes on a walk may be trivial. But on both occasions the bounds of politeness were pushed in a rather selfish manner.

Both of these events put my own enjoyment of wild land areas over the best interests of other occupants of the land, be they man or beast. They were both also visual sins. In the first instance I was impatient to experience the visual 'wow' of the view from the top, and was driven by the possessive impulse to conquer the mountain. The second instance of 'taking a photograph' was driven by the impulse to frame nature in an aesthetically pleasing manner. They were both, therefore, expressions of what the ecologist/philosopher John O'Neill calls 'lust for the eyes': the desire to see, experience, or obtain knowledge as a means of ownership or control.

I was  
impatient  
for the  
visual 'wow'  
of the view  
from the  
top





Following Saint Augustine's term, O'Neill criticises actions where 'organisms become merely means to satisfy the scientists' curiosity'. He argues that such a lust for experiences and knowledge can never be sated, as 'it displays an absence of the virtues of temperance and practical wisdom'. Pushed to its extreme limits, 'lust for the eyes', causes the destruction of the very thing that it desires.

The prickly French theoretician Guy Debord, whose work *The Society of the Spectacle* was published fifty years ago this year, was of the opinion that modern culture was in the process of being replaced by the representation of culture. Debord wrote that 'all that once was directly lived has become mere representation'. For him, this process was mediated through the visual spectacle. In essence he argues that real views are being replaced with photographs, and nature is being replaced with TV shows about nature.

Debord would argue that when we look at the view from the summit of a hill we are now not seeing the view, we are performing the act of seeing the view. When he writes that the spectacle enables 'the separation and estrangement between man and man', surely he also means the separation and estrangement between human and environment. In a society which values appearance over substance, where lived experience is replaced by the appearance of experience online, where food is photographed before being eaten, and every mountain top is a spot for a selfie, the once deeply unfashionable Debord is finding a new wave of admirers and acolytes.

Debord's ideas are somewhat shared by O'Neill, who writes that 'just as capitalism dehumanises in production, so it also dehumanises in perception – for it does not allow the individual to develop and exercise this specifically human capacity to respond to the world'.

One of the joys of wild land is that it allows humans a more direct communication with their environment than is possible in, say, an office block. Visiting an area simply to see the view from the top of the hills or to photograph a wild animal displaces other, more holistic ways of experiencing wild land. O'Neill writes that 'the trained ecologist, be she amateur or professional, is able to see, hear and even smell in a way that a person who lacks such training cannot'.

This is an example of an emerging, though deep-rooted argument in environmental philosophy which suggests that humans are at their best when they are capable of perceiving areas lacking the trammels of modern capitalism. For many of us, visiting wild land areas provides catharsis, a place to experience substance over appearance, and where one is forced by the very wildness of the land to live in the present.

This is not to say that the spectacular is inherently bad. Certainly the visual aspect of wild land is important to many of us, myself included. The incredible images of wild land available these days are regularly harnessed to raise awareness and funds for the conservation of wild land areas. Nevertheless, the danger is that visiting and experiencing wild land becomes just another facet of the society of the spectacle, where lust

for the eyes replaces genuine love of wild land.

When we talk of managing wild land, we are usually managing the human element of it rather than the non-human. We are managing the effects that lust for the eyes can cause. We are managing the car parks, the footpaths, the litter. The challenge is to allow as many people as possible to enjoy Scotland's wild areas without detriment to the experiences of other people and, more importantly, the wild land itself.

Wild land is far more than a series of views strung out across Scotland, to be viewed, photographed and ticked off. It is only through unshackling wild land from the hegemony of the spectacle that it can be protected, not because it has worth in its own right (though it does), but rather because wild areas provide a space where humans can be their best selves, and where a deep perception of the environment can provide a tonic from the superficiality, tedium and stress of modern life.

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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.

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