**Question 1**

**What is your opinion on the CAWL 2013 map?**

* The Scottish Wild Land Group (SWLG) regards the 'core areas' of wild land identified on Scottish Natural Heritage’s (SNH) current 2013 map as intrinsically valid and wholly defensible.
* We also believe that the map is a very necessary, objective summary of some of the best areas of wild land in the country.
* The value of our wild land is immense, not just within a national and European context (5.1) but globally; a resource, both material and non-material, which we should be proud to offer the world. The map has a crucial role to play in identifying the scale and nature of that resource.
* We consider the map, nevertheless, to represent a minimal definition of Scotland’s wild land, and one that would become invalid if further eroded. We note the absence of some areas identified as core areas of wild land in SNH’s Version 2: Interim Phase 1 Map, and contend that further changes made on the basis of consultation responses or commercial lobbying, and not on the basis of the kind of objective criteria employed by SNH, would be inappropriate.
* We suggest that there should be scope for additional areas of core wild land to be added to this map in the years ahead, if and when they are identified as satisfying the necessary criteria.

Scotland’s wild land is a priceless national resource, and one that should be treasured and protected, not least for the many social and economic benefits it brings the people of Scotland. Too much wild land has already been industrialised and too much is on the verge of being lost, without ever being formally identified. We therefore strongly support SNH’s work on mapping core areas of wild land. We also support their methodology, which is well-established, robust, and largely objective.

We consider the ‘core areas’ identified, however, to represent a minimal definition of Scotland's wild land in response to severe pressures for indiscriminate industrial development by the commercial wind farm lobby and government. We therefore support them with the reservation that there should be no further erosion of the boundaries of these areas and that the landscapes they encompass should remain entirely free of further industrial exploitation.

We are somewhat concerned that, having drawn a map of Scotland's core wild areas which represents, in the view of the SWLG, the absolute minimum acceptable as a valuable resource to be entrenched within the planning system, paragraph 4.6 could be taken as establishing the principle that every location within the map could be subject to endless challenge. It thus has the potential to negate the value of the map in its entirety.

We would suggest furthermore that as a map delineating this absolute minimum there be an acceptance that in the years ahead further areas of wild land which become recognised as significant in a national and indeed international context be added.

**Question 2**

**Do you have specific comments on any of the areas of the wild land identified?**

* All the areas of wild land included on this 2013 map are extremely important components of Scotland's natural heritage. It is clearly accurate to identify them as core areas of wild land.
* They are also crucial resources on which rural Scotland's tourist economy depends heavily.
* These areas merit not only identification, but strict protection for the above reasons.

It is remarkable and deeply regrettable that these landscapes and the wildlife that inhabits them are celebrated internationally but, unlike similarly valued areas in other countries, have never been accorded special status as protected areas. It should be noted, for example, that ecological surveys of the Dundreggan Estate by the environmental charity, Trees for Life, have revealed a previously unsuspected wealth of rare and endangered species on land that no longer features on the 2013 CAWL map (<http://www.treesforlife.org.uk/about/press/20130305.html>). The Scottish Government's biodiversity strategy refers to its vision of Scotland as "a world leader in the conservation of biodiversity by 2030" (<http://www.biodiversityscotland.gov.uk/doing/framework/strategy/>).

The SWLG believes that the achievement of any such ambition depends crucially on a commitment by the Government to adhere firmly to the 'core wild land areas' identified in the 2013 map as an absolute minimum. The identification of these areas should then be followed by much-needed investigation of the species and environments that they contain, to ensure that the production of this map is only the first step in recognising the existence and the value of previously neglected aspects of Scotland’s natural heritage.

**Question 3**

**Are there any other issues regarding the CAWL 2013 map, or its preparation, that you would like to raise?**

 "Perceived wildness": A fallacy

SNH is right to recognise that while people's appreciation of wild land is a subjective experience "there is sufficient common understanding of what wildness is to enable systematic identification of wild land on a consistent basis" (3.3). SNH have achieved this systematic identification with the 2013 core areas of wild land map.

We believe that the inevitable, but minor, subjective component of SNH’s methodology is cautious and defensible, and should not give those with commercial interests in the industrialisation of Scottish wild land an opportunity to undermine the entire exercise. The great majority of people in Scotland (and beyond) recognise and value wild land, and the SWLG would argue that those who object to the identification of wild land and insist on giving value to only that which can be measured in quantitative terms fail to recognise the holistic nature of our humanity.

SNH's methodology has been attacked, for instance by Scottish Renewables consultants, the London based property developers Jones Lang LaSalle, as 'subjective' on the ground that it concerns 'perceived wildness'. We disagree fundamentally with this and any similar claim. SNH's criteria for the definition of wild land are predominantly objective and measurable. The fact that they derive their significance ultimately from aesthetic and moral judgments does not diminish their validity any more than similar judgments invalidate our perceptions of the quality of the highest expressions of our artistic and literary heritage. **Perceptions, informed by reference to external criteria, are inherent in all estimations of value and should be respected**.

Acting on behalf of the increasing number of people who appreciate and recognise our wild land

The fact that our wild land is "widely appreciated and increasingly recognised as a high value asset" (2.1) has been clearly established by public surveys over the past decade (undertaken by the John Muir Trust and SNH itself). Both have been able to demonstrate in recent years the recognition that the people of Scotland and of the UK generally give to the importance played by our wild land in establishing that part of "our nation's identity that sets it apart from the rest of the UK" in addition to their understanding of the significant economic and mental and physical health benefits. There is an increasing appreciation of the diverse merits, of which not the least are psychological, of interacting, both directly and from a distance, with our hills and moorlands.

The impact of people on wild lands

A clear distinction exists between wilderness and wild land, and the SWLG recognises that we as a species have, over the millennia, played a role in determining the nature of our wild land. That however is not a reason in itself to argue for further development, especially where the impact of such development will be to deny to us and our children the immense benefits which our wild land as we know it today offers to us: benefits coming to be increasingly recognised internationally.

Our understanding of what is meant by wild land with specific reference to moorland

SWLG very much welcomes SNH's understanding of wildness (2.1). It is particularly important that attention is drawn to the fact that any identification of our wild lands is incomplete if it is limited solely to rugged mountainscapes. It must include our extensive moorlands (frequently difficult and indeed dangerous to cross) not only as invaluable assets in themselves providing a resource for recreation, biodiversity, securing a clean water supply to many areas and carbon management but in their relationship to mountain areas. The surrounding moorlands and their associated mountains are frequently one whole.

The fact that moorland is a prime asset was recognised by the Scottish Government itself in a paper which pointed out that peatlands can be damaged through a large range of management practices including the establishment of wind farms ([http://www.scottish.parliament.U](http://www.scottish.parliament.u/) /ResearchBriefingsAndFactsheets/S4/SB 12-28.pdf). The negative impact of the construction of wind turbines and the associated infrastructure on non-degraded peatlands was brought to our attention in the magazine 'Nature' just over a year ago by the team from Aberdeen University which advises the Scottish Government and the Wind Industry.

The determination of boundaries

No area should have its boundary determined with reference to possible developments. In fact we would go further and suggest that existing wind farm developments should not influence the route of the boundary. By adopting this approach we can clearly identify those areas of wild land which have already been desecrated by such development.

The effect on the map of lobbying by commercial interests

As above, we note that these 'core wild land areas' mark a significant retreat by SNH from their Version 2: Interim Phase 1 Map which encompassed much wider areas than that of 2002. We accept that this latter map, published ten years after the initial map of search areas, was intended for further consultation. We nevertheless regret that such a process of consultation and wider ecological research has apparently been preempted by the lobbying activity of commercial interests like Scottish Renewables (Designations and Wild Land: Discussion Paper, February 2013 Jones Lang LaSalle).

Distinction between identification and protection

While we believe that the protection of core areas of wild land is crucial and of great potential social and economic value, we also recognise that an important distinction exists between the identification of core areas of wild land and any subsequent decision about their protected status. We therefore suggest that objections to SNH’s map based on inferences about its economic or other implications are not relevant to this consultation, which concerns the identification process itself.

Appendix

W.H. Murray was a Himalyan and Alpine climber and the author of the classic books Mountaineering in Scotland and Undiscovered Scotland. He held the posts of Commissioner for the Countryside Commission for Scotland, President of the Scottish Mountaineering Club, of the Ramblers Association Scotland, of the Mountaineering Council of Scotland, Chairman of the Scottish Countryside Activities Council and was a founding Trustee of the John Muir Trust.

In 1962 the National Trust for Scotland published Highland Landscape, a report on a survey undertaken for the Trust by W. H. Murray, the purpose of which was to identify and describe the regions of supreme landscape value.

**SWLG asks SNH and indeed the Scottish Government to recognise the significance of W.H. Murray and pay tribute to him in this, the centenary year of his birth, by ensuring that positive steps be taken to stop the processes which he would be appalled were still having to be challenged fifty one years after the publication of Highland Landscape.** **It is further proposed that there can be no better way of taking these positive steps than by endorsing the SNH Core Areas of Wild Land 2013 Map as submitted for consultation and entrenching it in the Scottish planning system.**

In his conclusion in that publication Murray asserted that "*it can now be seen that the changing face of Scotland has suffered in the past haphazard change, and that many more changes, from many different quarters, threaten it in the immediate future. The ugliness that has grown up in so many of our towns arrived there insidiously, creeping in by degrees through lack of over-all direction, foresight, or control. The same situation is arising in the Scottish Highlands. The outstanding beauty of the Highland scene, which is one of the nation's great natural assets, has been haphazardly expended and no account kept. The wasting away of this asset is bound to continue and to accelerate unless discrimination and control are brought to bear by some body created for the purpose and granted powers by the government, so that checks and safeguards may be instituted. If action to that good end be not taken now, the Scottish people* *will lose by neglect what remains of their natural heritage."*