

CONSIDERATION OF PETITION PE1383

The Scottish Rural Property and Business Association (SRPBA) welcomes the opportunity to respond to PE1383:

“Petition by Helen McDade on behalf of the John Muir Trust calling on the Scottish Parliament to urge the Scottish Government to improve the protection for the best areas of wild land by introducing a new national environmental designation.”

Introduction

The Scottish Rural Property and Business Association (SRPBA) is a membership organisation that uniquely represents the interests of both land managers and land based businesses in rural Scotland. Our membership, which numbers around 3,000 in total and includes both those directly involved in active land management and professional members who advise clients, accounts for the majority of non-publicly owned land in Scotland.

SRPBA Comments

The SRPBA recognises the significance of Scotland's more remote areas and is aware of the tremendous benefits which they bring to the country, for example in terms of biodiversity and tourism opportunities. However, the Association has deep concerns about the proposals outlined in PE1383 and we do not think that a new national environmental designation for “wild land” should be introduced. Our key concerns are outlined below.

The abundance of conservation designations in Scotland

The existing suite of conservation designations in Scotland is extremely complicated and consequently often confusing for land managers. To add another designation to the list would only add to the confusion. For example, much of the Flow Country has quadruple protection: SSSIs, SACs, SPAs and Ramsar Sites. Are we to add “wild land” to this list?

Difficulties of definition

The SRPBA believes that it is foolhardy to even consider a “wild land” designation in Scotland when an agreed definition still appears to be unattainable. Should “wild land” be defined based on human perceptions? Alternatively, should “wild land” be defined based on biophysical characteristics? If the former suggestion is adopted then the definition becomes very subjective because “wild land” to one person might represent their local park, which is inevitably highly managed, whereas to another person it might mean the Cairngorm Plateau. Indeed, it could be argued that no real “wild land” truly exists in Scotland since land managers and public bodies manage all land to some degree, even if just in an extensive manner.

Threatened “wild land” versus Threatened communities

In Scotland, the areas with the greatest economic needs and those with the highest conservation value frequently coincide. This is mainly because lack of opportunity for economic development over long periods has frequently meant that such areas are least modified by human activity. However, these same areas are in most urgent need of socio-economic assistance. By implementing a “wild land” designation and placing

the accompanying restrictions on local communities, the SRPBA fears that inhabitants of Scotland's more remote areas will be forced to leave. Already we see impacts on socio-economic outcomes in areas that are subject to "designations". These can have clear adverse social, economic and then ultimately environmental impacts on local communities and areas. In a recent report from Scotland's Moorland Forum, entitled Upland Solutions which conducted ground level research with local communities in the Muirkirk and Tomatin areas, a clear view was expressed from the local community in Muirkirk that being subjected to an SPA designation has had and continues to have a hugely damaging impact on the socio-economic fortunes of the local community and this SPA for Hen Harriers is now failing.

Section 21 of the report, referring to Muirkirk states "The perception was that the upland bird populations had continued to decline in spite of the designation [of the SSSI and SPA]..... Issues that could be considered for further investigation include.... The economic and socio/cultural impact of the designation in addition to the environmental / conservation impact.... If the bird populations are falling short of expectations it brings into question the purpose of the designation."

Developments on the edge

If the main purpose of these "wild land" designations is to avoid development, there is the distinct possibility of the designated sites becoming "ring fenced" by developments around their edges. The SRPBA does not believe that this is a sustainable approach to land use.

Achieving other targets

Scotland's land resource is finite and it is important that we use it wisely. There are a number of land based targets currently in the policy arena but two examples will suffice here. Firstly, the Scottish Forestry Strategy (2006) sets an ambition to increase tree cover in Scotland from 17% to 25% by 2050. Would this planting be permitted within a "wild land" designated area? Secondly, in order to help achieve the ambitious targets outlined in the Climate Change (Scotland) Act 2009, the Scottish Government published a Renewables Action Plan stating that 20% of total Scottish energy consumption should come from renewable sources by 2020. Would new renewable energy developments be permitted within a "wild land" designation area? If the answer is "no" to these questions, the SRPBA questions the possibility of reaching the targets outlined.

Conclusions

The SRPBA believes that the implementation of a "wild land" designation would merely add to the already overly complicated system of conservation designations in Scotland. The Association wants to see a prosperous and thriving rural Scotland; socially, economically and environmentally. We do not think that introducing more layers of bureaucracy, in the form of a "wild land" designation, will help in achieving this goal and therefore recommend that this proposal is not pursued.