

RSPB Scotland Response to “SCOPING AN UPLAND VISION: KEY QUESTIONS”

The uplands are extensive in Scotland, covering almost half of the country’s land area, or up to 85% depending on the definition used. When managed sustainably, they can deliver clean water, wildlife habitat, carbon capture and storage, recreational opportunities, are rich with cultural heritage and sustain rural livelihoods. However, upland landscapes have been heavily influenced by historical, production-focused subsidies (agriculture & forestry) and continue to be shaped by a complex mix of land uses and land users. This leads to conflicts and tradeoffs which affect the functioning of upland ecosystems and delivery of the services they have the potential to provide. For this reason, we believe that **a strategic vision for the uplands is essential and we urge Scottish Government to commit to its production.** Delivery of the vision should be embedded within the regional land use frameworks proposed in the revised Scottish Land Use Strategy.

Where are the uplands?

1. What broad characteristics should we use to define the uplands?

The following are some accepted definitions of “upland”:

- Land above the level of agricultural enclosure¹, generally from 300-400m above sea level but lower in some cases
- Land within the designation of Less Favourable Area (LFA, EC Directive 75/276)². It is worth noting that the LFA designation will be replaced by a new designation of Areas Facing Natural Constraint by 2018, as required by the European Commission.
- Ecological – Bog; dwarf shrub heath; acid grassland; fen, marsh and swamp; bracken; inland rocky habitats; high mountains³

However, an upland vision should focus more on addressing land use conflicts than trying to define boundaries. The vision must recognise that the benefits of the uplands and, conversely, the impacts of unsustainable land management practices within them, will also be felt outside whichever boundary is applied.

What benefits do the uplands provide to Scotland?

2. What are the key social, economic and environmental benefits that the uplands provide for Scotland?

The ecosystem services delivered by upland habitats are discussed in detail in the National Ecosystem Assessment⁴ and in a suite of academic publications. The IUCN Commission of Inquiry on Peatlands⁵ further discusses the economic and environmental benefits delivered specifically from peatlands. Such documents provide more information and detail than we can outline here and should be referred to when developing an upland vision for Scotland. Some of the key ecosystem services delivered are outlined below:

- Peat soils play a vital role in carbon storage and sequestration.
- Climate and topography in Scotland mean that upland catchments are the source of most of the fresh water we use.
- Peatland restoration can contribute to flood regulation by reducing the flow of water off the hills. Restoring peatlands can also reduce leaching of soils during flash floods, as water travels more slowly over a healthy bog surface dominated by bog-forming mosses.

- Uplands provide health and wellbeing benefits through cultural links and recreational opportunities.
- Scotland's iconic upland landscapes attract visitors which contribute to the tourism economy: nature-based tourism in Scotland is worth £1.4 billion per year and supports 39,000 jobs
- Upland native woodlands have significant biodiversity value, store carbon and can help alleviate flooding by stabilising sediment and slowing flows.
- Upland forestry plantations provide timber.
- Uplands provide food and an important income source for rural communities, in the form of livestock, game and fish.
- Uplands provide habitat and food for a range of priority species.

3. How can upland land use help to prevent or reduce the impacts of climate change?

When managed effectively, upland habitats can contribute to climate mitigation and adaptation. Intact peatlands are the single largest carbon store in the UK, storing some 5 billion tonnes of carbon. Scotland alone holds 2.7 billion tonnes in peat and other soils, with 1 billion stored in blanket bog⁶. However, 80% of them are degraded in some way⁷. Upland peatlands designated as Sites of Special Scientific Interest or Special Conservation Areas fair better; 64.4% are in favourable conservation status and a further 14% are unfavourable recovering. However, even these sites are affected by pressures such as overgrazing, burning and trampling⁸. Damaged peatlands have less ability to capture and retain stored carbon; they also release carbon into the air and water. Therefore, peatland restoration both increases up-take of carbon from the atmosphere and stops it being released from the soil, with a net long-term cooling effect on the climate⁹.

What should an upland vision include?

4. A strategic vision could inform decisions about the balance between different land uses in different parts of the uplands. What are the key choices that an upland vision should address, and why?

Uplands deliver a wide range of ecosystem services. However, there are also multiple uses and multiple users so conflicts and tradeoffs are inevitable. In many cases, land is managed with a single interest, often for private benefit, and a lack of strategic direction for upland management means that one land use can directly and negatively impact another. Some incredibly contentious conflicts need to be addressed, examples of which are detailed in Table 1.

Table 1: Upland land uses, their benefits, potential conflicts and the legislative framework.

Land use	Action	Purpose	Conflict	Policy/regulation
Sporting estate: grouse. A brace of grouse is valued at £3,750 - £5,500 ¹⁰ .	Predator control	Removal of crows, foxes and small mustelids (mainly weasel and stoats) can increase grouse densities and can also increase breeding success of ground nesting birds such as lapwing, curlew and golden plover.	Illegal killing of raptors (responsibility for and scale of which is contested by shooting estates)	Persecution of raptors is an offence under Part I (1) the Wildlife and Countryside Act 1981. However, a report commissioned by Scottish Environment LINK found that wildlife crime, including raptor persecution, was under-recorded, follow-up investigation was inconsistent and at least 75% of crimes failed to result in prosecution ¹¹ , despite RSPB Scotland reporting 118 incidents of poisoning aimed at raptors between 2008-2012 ¹² . There is strong scientific evidence that the geographical range and numbers of raptors such as golden eagle ^{13,14,15} , hen harrier ^{16,17,18,19,20} , peregrine ²¹ and red kite ^{22,23} are limited by wide scale killing.
	Burning	Burning is used to manage moorland to create heather mosaics for food and cover for red grouse, and to a lesser extent for managing livestock grazing conditions. Burning undertaken on appropriate rotations and intensities, and not on deep peat, may have some applications for conservation by maintaining a varied vegetation structure for plant, invertebrate and bird communities ²⁴ . Burning is claimed to aid wildfire risk reduction although there is no empirical data to support this.	Burning can have negative impacts on soil ²⁵ , water quality ²⁶ , peat hydrology, aquatic invertebrate populations and carbon storage ²⁷ . It is also one of the key pressures affecting designated site condition ²⁸ . Negative impacts may be particularly pronounced when combined with other pressures such as over-grazing and drainage ²⁹ .	Muirburn is covered by the Hill Farming Act 1946, as amended by the Wildlife and Natural Environment (Scotland) Act 2011 and the Climate Change (Scotland) Act 2009. The Muirburn Code sets out the standards required for appropriate burning ³⁰ . Muirburn is permitted in Scotland between 1 st October and 30 th April. On SSSIs, burning may be identified as an Operation Requiring Consent under S19 of the Nature Conservation (Scotland) Act 2004. However, burning has been identified as one of the top ten pressures affecting feature condition of designated sites in Scotland ³¹ and, despite a presumption against burning on deep peat ³² , recent research found that 28% of all 1-km squares subjected to burning in Scotland overlie deep peat, and the annual number of burns increased significantly between 2001-11 ³³ .
	Disease control - Application of medicated grit	Grit is treated with flubendazol to control <i>Trychostrongylus tenuis</i> , a parasitic nematode worm which has a cyclic impact	Poor practice can lead to drug resistant worms, drugs entering drinking water or the food chain. Chemicals can persist in the	Medicated grit can be prescribed by a veterinary professional under the Veterinary Medicines Regulations 2013, and has a minimum statutory withdrawal period of 28 days prior to a shoot. In theory, compliance with this

Land use	Action	Purpose	Conflict	Policy/regulation
		on grouse populations.	environment and in faeces.	would be confirmed by a sampling regime established under the Animal and Animal Products (Examination for Residues and Maximum Residue Limits)(England and Scotland) Regulations 2015. This implements Commission Decision 97/747/EC, which fixes levels and frequency of sampling provided for by 96/23/EC for monitoring of certain substances and residues thereof in milk, eggs, rabbit meat and the meat of wild and farmed game. In reality a freedom of information inquiry by Raptor Persecution UK discovered that no red grouse had been sampled to date so no effort has been made to ensure that the law regarding withdrawal of medicated grit has been adhered to, nor that grouse meat is safe for human consumption.
	Disease control - Controlling carriers of ticks to reduce risk of Louping-ill.	Louping-ill is transmitted by <i>Ixodes ricinus</i> ticks and can kill red grouse. Grouse chick production may improve where ticks are controlled. Mountain hares are carriers of ticks. They are controlled in order to reduce tick numbers with the aim of reducing prevalence of louping-ill and increasing grouse densities.	A scientific paper that later has received much criticism ³⁴ suggested that controlling mountain hares might reduce tick burden in red grouse. However, more recent work suggest that this assumption may not be true. In addition, culling can have significant local impacts on hare populations and there is little evidence to suggest that it has a positive impact on grouse numbers, particularly if other tick hosts are present.	Annex V of the EC Habitats Directive (92/43/EEC) lists the mountain hare as a species 'of community interest whose taking in the wild and exploitation may be subject to management measures'. Scotland has a duty to maintain favourable conservation status of the species, which requires active monitoring. However, adequate monitoring methods and data on population trends are currently lacking. Therefore, the population impacts of culling on mountain hares are poorly understood. The Wildlife and Natural Environment (Scotland) Act 2011 prescribes a closed season prohibiting mountain hare culls between 1 st March and 31 st July and in 2014, SNH called for "voluntary restraint" on hare culls. However, SNH have noted instances where large culls have significantly impacted local populations.
	Disease control – using acaricidal leg bands on grouse to reduce tick burden	See above	Acaricidal leg bands are unlicensed so the Game and Wildlife Conservation Trust advise "adapting existing products which require an off-label prescription from a veterinary surgeon" ³⁵ . This raises	In Scotland, grouse can be caught at night to administer medication all year under general licence from SNH, except during a closed season between 16 th April and 31 st July. This means there is a real risk of pesticides entering the food chain through shoot grouse if the 28 day withdrawal period is not adhered to.

Land use	Action	Purpose	Conflict	Policy/regulation
			the question of what pesticides are being used, at what dose and what their withdrawal period is.	
	Drainage	In a grouse moor context, wetter areas were historically drained using open ditches to dry the soil and encourage heather growth. However, there is little evidence to suggest that drainage increases heather cover and as such that it has any positive impact on grouse numbers ³⁶ .	Drainage ditches lower the water table and dry out peat soils, resulting in declines of bog species such as <i>Sphagnum</i> mosses ³⁷ . This, coupled with erosion of drainage channels, reduces the ability of blanket bogs to capture and store carbon, turning them to carbon sources rather than carbon sinks ³⁸ . Drainage ditches also increase flow of water off bogs, reduce their water-holding potential and have been linked to increased flooding risk downstream ³⁹ .	Drainage was influenced more by past policies and subsidies and much of it is historical, but until drains are blocked, they will continue to have an impact.
Sporting estate: deer	Deer stalking	Deer stalking is thought to generate £105M per year, with £70M of this staying in Scotland. Deer stalking directly supports 966 FTE jobs and indirectly supports a further 1554 FTE jobs. In addition, red deer also contribute to the capital value of sporting estates, with every stag and hind shot on a sporting estate contributing £ 22,000 and £2200 respectively to the value of the estate ⁴⁰ . Therefore, there are a number of financial incentives to maintaining high deer numbers.	Overgrazing and trampling are responsible for damage to biodiversity, including degrading the condition of designated features. Elevated deer numbers also have significant economic impacts on commercial forestry and native broadleaves, causing further economic damage and public safety concerns by causing road traffic collisions. Therefore, income from deer stalking must be set in the context of the societal, environmental and economic costs of the impacts.	The Deer (Scotland) Act 1996, as amended by the Wildlife and Natural Environment (Scotland) Act 2011. Land Reform Act 2016 adds further statutory powers. Control Scheme; Control Measures; Emergency Measures; and Land Management Orders could all be used to secure better deer management, which can also be incentivised using the SRDP Moorland Management Option. However, there has, thus far, been an over-reliance on voluntary measures.
Renewable energy	Windfarm development	Renewable energy will make an important contribution to	Development of windfarms and hydro-electric schemes have	The Climate Change (Scotland) Act sets an emissions reduction target of at least 80% lower than the baseline by

Land use	Action	Purpose	Conflict	Policy/regulation
	and Hydro schemes (and potentially associated grid infrastructure)	reducing our emissions targets – although it is important to note that if inappropriately sited, carbon benefits of renewable energy can be significantly undermined by disruption to peatlands.	generally been concentrated in the uplands, adding more pressure to an already vulnerable system. Poorly planned energy infrastructure can have a negative impact on biodiversity. For example, wind farms can harm sensitive upland bird species through collision, disturbance and displacement, and sensitive habitats such as peatlands can be significantly affected through disruption to hydrology and loss of carbon stocks ⁴¹ . Hydropower can cause severe harm to river and other freshwater ecosystems through barrier effects and fluctuating water levels. This has knock-on effects for species such as black-throated diver and common scoter. Construction can disturb surrounding ecosystems such as peatland and woodland. Developments must be carefully planned at a strategic and project level, and impacts assessed and monitored in order to balance environmental considerations with the benefits of renewable energy. There are further potential conflicts between forestry and renewable energy development as trees are cleared to make way for turbines.	<p>2050, with an interim target of a 42% reduction by 2020, likely to be increased in the forthcoming new Climate Bill. In working towards these targets, Scotland has a target to generate the equivalent of 100% gross annual consumption of electricity from renewables by 2020⁴². There is no national strategic plan for onshore wind in Scotland but the Natura network, designated under the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), has acted as a de-facto strategic spatial planning tool, highlighting to developers which parts of the country are most sensitive.</p> <p>In general the development of onshore wind has so far avoided significant harmful effects on biodiversity, with a few exceptions, but siting is becoming gradually harder as ‘easier sites’ are developed. Continued growth of onshore wind is likely to be important to meeting climate targets, but this must be strategically planned to avoid sensitive sites and maximise deployment for minimum impact. Scottish Planning Policy (SPP) sets out criteria for the development by local authorities of constraints maps for onshore wind, recognising Natura sites, SSSIs, National Nature Reserves, Ramsar sites, carbon rich soils, deep peat and priority peatland habitat (amongst other constraints) as requiring ‘significant protection’.</p> <p>Large (>50MW) onshore wind sites on peatlands are also required to use the Scottish Government carbon calculator to assess carbon impacts, although the value of outputs is limited as there is no guidance on what an acceptable impact is. Other development types (including smaller wind farms, grid infrastructure) and hydro schemes are required by SPP to assess and minimise impacts on peat, but as there is no associated guidance or required tool, this policy has had limited effect.</p>

Land use	Action	Purpose	Conflict	Policy/regulation
Forestry	Tree planting	Scotland has a target of increasing tree cover to 25% of the land area, with an annual target of 10,000ha per year. This is in recognition of the fact that appropriately sited forestry, and the right mix of trees, can deliver richer and more diverse habitats for wildlife; enhanced landscapes; sequestration and long-term storage of carbon; timber, wood-fuel and other woodland products; Ecosystem services, including clean water, mitigation of diffuse agricultural pollution, and reduction in flood risk; secure jobs and enhanced rural and national economies ⁴³ .	From the 1940s-80s plantation of coniferous species on peat and mineral soils became much more widespread, most of which was encouraged by policy and economic drivers. One 10 th of blanket bog in Scotland is now covered by non-native plantation and whilst there is now a presumption against new planting on deep peat, the impacts of existing forestry are still being felt ⁴⁴ . Afforestation of the uplands has led to more drainage and increasing soil and water acidification. It has also been associated with declines of populations of wading birds, both from habitat loss and from the edge effects of forestry surrounding open habitat. There are also potential conflicts with other land uses, for example, agriculture, when trying to identify land available or suitable for tree planting.	Scottish Forestry Strategy (2006); Climate Change (Scotland) Act 2009; Biodiversity duty for publicly owned forest; Tree Preservation Orders; Common Agricultural Policy; Scottish Rural Development Programme.
	Forestry operations	Economic benefits jobs and income from forestry	Forestry operations one of top ten pressures impacting designated features of protected areas. Forestry also contributes to water quality issues.	Biodiversity duty for publicly owned forest; Tree Preservation Orders; Controlled Activities Regulations and GBRs 18, 20,21, 22 and 23.
Agriculture	Livestock grazing; overgrazing	Grazing can be an important habitat management tool in the uplands. A number of habitats, for example semi-natural grasslands, have been altered by historical human agricultural	Grazing in the wrong place, at the wrong time or at too high a stocking density can have a negative impact on vegetation assemblages and the habitats they comprise. Inappropriate grazing has been	Good Agricultural and Ecological Condition (GAEC) 5 but only with reference to grazing around water courses and feeding troughs; Nature Conservation (Scotland) Act 2004 enables SNH to seek Land Management Order if overgrazing is considered to be impacting feature condition on designated sites; a Restoration Order may be

		activity ⁴⁵ . They rely on sustainable grazing systems to maintain species diversity and prevent scrub encroachment ⁴⁶ .	shown to reduce species diversity and reduce abundance of vascular plants, grasses, lichens, liverworts and mosses; favouring herbs, shrubs and sedges ⁴⁷ . Furthermore, once the damage is done, reducing grazing pressure in the absence of other management interventions may not be enough to restore original species composition ⁴⁸ .	made only after a conviction for reckless or intentional damage to an SSSI, or for breach of Nature Conservation Order/Land Management Order.
	Livestock grazing: undergrazing	Decoupling of farm subsidies from production in 2005 have reinforced a trend of a general reduction in grazing over the past ten years within the LFA. In Scotland there has been a significant reduction in breeding ewes and grazing pressure has fallen within the LFA by 16.3% ⁴⁹ .	Reduced grazing pressure has been beneficial for some upland habitats, such as blanket bog, dry heath and wet heath ⁵⁰ . However, under-grazing can have a negative impact on vegetation structure, and the biodiversity these habitats support. For example, some species such as ground-nesting birds require a mosaic of sward heights for cover and patches of open ground for feeding. Taller vegetation and scrub can provide cover for predators so under-grazing can reduce habitat suitability. Reduction in livestock numbers can also facilitate an increase in numbers of other herbivores such as deer, which can in turn result in overgrazing.	See overgrazing.
	Burning	Burning is primarily associated with grouse moor management but is sometimes used to manage grazing conditions.	See burning for grouse	See burning for grouse.
	Agricultural operations	Agricultural production takes place on 75% of Scotland's land area ⁵¹ and the food and drink	Around a fifth of green house gas emissions originate from agricultural activities ⁵³ and agricultural	Common Agricultural Policy; Scottish Rural Development Policy; Statutory Management Requirements; GAECs; Controlled Activities Regulations and GBRs.

		industry is worth £14Billion ⁵² . Traditional farming systems had a role in creating and maintaining many important habitats.	intensification has been linked to degradation and loss of habitats and declines in biodiversity ⁵⁴ . Agricultural operations include drainage ditches, spreading slurry, poaching and use of off-road vehicles.	
Recreation	Walking/hiking/skiing/mountain biking/off-road vehicles	Increasing people's use of the Scottish outdoors is a national performance indicator, and 50% of adults visit the outdoors at least once a week ⁵⁵ . The Scottish uplands are iconic and attract opportunities for tourism and recreation, which in turn provides a boost to the economy. There are also health benefits to outdoor recreation. Wildlife-rich green space has been linked to stress reduction in adults ⁵⁶ and children ⁵⁷ ; and individuals with access to nature are less likely to become overweight or obese ⁵⁸ .	Pressures associated with recreation include car parking, cycling, dog walking, fishing, motor bikes, off road vehicles, walking and wild camping. Therefore, access must be carefully managed to ensure that people have an opportunity to enjoy the natural environment whilst the landscapes and wildlife that draw them there are protected.	Outdoor Access Code. Power to exempt particular land from access rights; Path Orders; Nature Conservation Orders.
Drinking Water	Drinking water abstraction	Uplands are source for majority of drinking water in Scotland	Some land management practices, for example burning, drainage and over-grazing, can impact water quality. This has a knock-on economic cost in terms of water treatment, which could be offset by securing more sustainable water catchment management	Water Framework Directive, Drinking Water Directive 2015/1787; Nature Conservation (Scotland) Act (2004); Wildlife and Countryside Act (1981) amended by the Wildlife and Natural Environment (Scotland) Act (2011); Water Environment and Water Services (Scotland) Act 2005; Water Environment (Controlled Activities) (Scotland) Regulations (CAR) 2011; The Common Agricultural Policy (Cross-Compliance) (Scotland) Regulations (2014); Statutory Management Requirements; GAECs; General Binding Rules (GBRs).

5. Are there any other topics or issues that should be included in an upland vision, and if so why?

National and international importance of Scottish Uplands: Scotland supports a rich and varied natural heritage, much of which has been shaped and influenced by man for centuries. The mountains, moorlands and heath which cover 46% of Scotland's land area contain 90% of the UK's montane habitat⁵⁹ and one of the largest contiguous areas of blanket bog in the world⁶⁰. About 4% of the total global resource is found in the Caithness and Sutherland peatlands⁶¹, as well as iconic species such as mountain hare, golden eagle and red deer⁶², ptarmigan, dotterel and wildcat⁶³. Therefore, Scotland's responsibility to manage its upland resource reaches beyond our borders.

National parks: National parks have a vital role to play in influencing upland land use. National Parks and their Park Plans can make a real difference and facilitate effective nature conservation and sustainable development, reflecting their first statutory aim which is to conserve and enhance the natural and cultural heritage of the park area. By setting the vision and strategy for managing National Parks, and guiding the work of public bodies and other partners to deliver the park's aims, National Park Plans can address different priorities and perspectives, bringing partners together to conserve and enhance natural heritage.

Disconnect between users and providers: Moving towards more sustainable land use in the uplands is challenging because the beneficiaries of upland ecosystem services tend to be located in urban areas, whilst the providers/land managers bear the costs of provision. Much more investment is required in developing a framework and delivery mechanism for payments for ecosystem services, which incentivises delivery of public goods for public money.

Challenges facing upland communities: Upland communities have suffered in recent years from few job opportunities, out-migration of young people, farm abandonment and increased average age of farmers. Lifestyle migration into more rural areas has pushed up house prices and reduced access to affordable housing. In some areas, jobs and income are partly dependent on sporting estates so less intensive grouse moor management or reducing deer numbers could have a socio-economic impact. Increasingly, income is generated through development of renewable energy in the uplands, though this income does not always reach local communities. Any Upland Vision must outline how sustainable livelihoods could be secured whilst positive land use change is delivered.

Uncertainty over future of subsidies: Farmers in LFAs rely heavily on subsidies, which have been decreasing, and Brexit introduces even more uncertainty for the future of farming in these areas. Forestry will also be significantly affected by subsidy cuts. However, it may also provide an opportunity to ensure that whatever replaces SRDP delivers public goods for public money. Under such a model, high nature value farming would have an increasingly important role in the uplands.

Land Reform: An upland vision should guide and be guided by the Land Rights and Responsibilities Statement, due to be produced as an action from the Land Reform (Scotland) Act 2016. The Statement should outline the responsibilities that come with land ownership, with regard to land use and management.

Compatibility and interactions with other strategies affecting land-use

An upland vision would need to be integrated with other Scottish Government strategies that have a significant impact on land-use in the uplands. For example, the forthcoming new Scottish Energy

Strategy is likely to set out ambitions for increased deployment of onshore wind, which will have significant potential impacts on land-use planning, biodiversity and other ecosystem services in the uplands.

6. Are there any topics or issues that should be excluded from an upland vision, and if so why?

Upland land management involves a unique set of challenges and tradeoffs which are not addressed collectively in any one policy or strategy. Therefore, the vision must focus on addressing and setting out what we want from and for our Scottish uplands in the shorter and longer term and some solutions or options to overcome the key issues. The process must not be sidetracked by individual interests.

How should the vision be developed?

7. Which stakeholders do you think it would be particularly important to involve, and how? Would particular approaches be needed, for example, to reach particular groups?

Land owning and managing groups, local communities and communities of interest are an obvious place to start. However, it will be important to engage outside of the “usual suspects”. Cultural and historical interests should also be involved and it will be important to engage the public of the central belt.

8. What are your views on the process that might be needed to bring together the key interests and develop a shared vision?

Issues and interest groups may vary from region to region so we suggest a dispersed consultation process which gives different stakeholders the opportunity to come together and discuss issues locally.

9. Who would be best placed to lead this process?

Given the challenging nature of gaining consensus on upland issues, the process must be facilitated or led by a neutral group/body, which will not stand to make a personal loss or gain from potential outcomes.

10. What form should a vision for the uplands take (visual or descriptive, maps, diagrams or text)?

We would suggest that a range of outputs should be generated to engage a range of audiences in the production of a vision. All available media should be used to draw out issues. The vision should then be embedded within and delivered through development and delivery of regional land use frameworks.

11. Do you have any other comments or suggestions?

Although we ultimately need a strategic vision for all our land – upland, lowland, rural and urban – we consider there is a specific set of challenges and opportunities regarding the uplands that would merit a more strategic approach to land use and management there. We would therefore like to see Scottish Government commit fully to development of an upland vision as a result of this scoping exercise. This is even more pertinent now because an exit from the EU means that the subsidies essential for maintaining incomes in rural areas will change. A strategic Vision for

the Uplands will enable us better identify land uses and management practices which will future-proof our uplands and better focus which ever form of subsidies come next.

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