



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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## Ben Wyvis NNR Management Proposals Response 2009- 2015

### Mountaineering Council of Scotland Response

The Mountaineering Council of Scotland (MCoS) is recognised by the Scottish Government as the representative body for hill walkers, climbers and ski-tourers. We have 10,000 members, and represent the interests of all 400,000 mountaineers. Ben Wyvis is a popular mountain as Munro and with a close proximity to a relatively main road and to Inverness. Access is enjoyed for all mountaineering activities, and popular throughout the year.

#### 1. Introduction

The vision that, in 2025, the “condition of the habitats at Ben Wyvis has improved over the last 50 years,” does not appear to make sense in the context of these management proposals referring to 2009-15. The assumption would be that, when 2025 is reached, the condition of habitats should have been improving since 1975. That is even before the acquisition. The fact that 4 SAC qualifying habitats are in unfavourable condition suggests that this may not be the case, unless there has been reliable monitoring since 1975 that shows this improvement. A realistic and more meaningful vision should be considered for substitution.

The vision that “the NNR shows best practice in all aspects of its management,” is widely interpretable. It should be considered what this actually means within the restrictions of budgets, and the variety of parameters against which “best” could be judged. This would benefit from clarification.

It is unclear what the vision that “the NNR is popular with visitors, ... and walk the route to the summit,” actually means. It is not necessary for visitors to walk to the summit for educational purposes and this vision suggests an aim of positively encouraging people to walk to the summit. This needs to be clarified.

It is debatable whether the “erosion caused by recreational activities,” can truly be considered to be “widescale.” It is certainly significant where it occurs, but is localised in terms of the area of the Reserve; the words, “significant but localised,” may be an appropriate substitution.

The vision should include a statement that use of motorbikes, illegal activities and non-essential use of ATVs are no longer occurring.

The objectives in the table (p2) will be commented under the relevant section headings, and any changes will need reflected in this table. It should be noted that the table has 8 objectives, but the last objective in the text is number 9.

## **2. Natural Heritage Management**

**The Uplands (p5):** Objective 1 – to improve the condition of the upland communities

A proposal is to monitor the effects of ATV use (p5), however as has been found with recreational damage, reacting when the effects are already evident is costly both in terms of resources and recovery time. Page 4 states that “hummocks and ridges are prone to erosion and, if damaged will not reform under present climatic conditions.” Page 5 states that the NNR has “some of the best examples of alpine and sub-alpine heath in the UK.” And that “moss heath ... is highly susceptible to trampling and to the activities of grazing animals.” The latter is likely to mean the habitat is susceptible to damage by other activities such as ATVs. ATV use will damage the ground, especially if used on the most susceptible habitats, and because the vegetation is so slow growing at the relevant altitudes, it would be far better to monitor the ATV use, as well as the impacts. Restricting ATV use to defined essential use should be considered. This may be possible through the SSSI ORCs. Ben Wyvis has been an NNR since 1982 and SNH should be acting to prevent any damage by ATVs.

It is disappointing that the whole of the plateau and associated slopes are not part of the future NNR as they are part of SSSI, SAC and SPA and are both part of an integrated whole and hence of similar level of importance as a national site. It is unclear how closely the Management Reserve Agreement allies the two parts of the whole. This is especially disappointing as the apparently main source of native woodland seed on the reserve was in the area of de-designation. This is also of particular concern due to reports of ATV use that did not appear to be of an essential nature. It would be of concern if non-inclusion in the NNR meant more lax limit on ATV use outside the area, but within the Reserve Management Agreement area, despite the areas both being SACs. This is especially concerning as the vision of achieving “a natural sequence of habitats has developed grading from scattered native woodland and shrub rich heath on the lower slopes into moorland above and a mosaic of upland communities on the high tops and crags.” At present the only place within the original NNR boundary where this sequence is present will be outwith the NNR boundary in the future.

The MCofS supports the commitment to “additional monitoring,” to “assess whether browsing impacts are reducing.” This additional monitoring, if established appropriately, could also determine if browsing levels remain too high and assist in setting deer cull levels.

The MCofS agrees with the proposal to stop burning until there is a satisfactory heather management plan.

**Woodland Edge (p7):** Objective 2 – to increase the area of native woodland and shrub rich heath on the reserve

The MCofS would hope that the “simple tree/shrub regeneration monitoring, in combination with the deer dung transects,” equates to data that robust and effective, and enables cull levels to be determined. It may be more confidence-inspiring if referred to similarly.

The Plan runs from 2009 to 2015. Within this period, even with optimal grazing and browsing levels, there will be little or no advance towards the vision of softening the “hard edges” (p7) through natural regeneration or achieving a “natural sequence of habitats” (p1). The MCofS

suggests investigation of possible future re-inclusion in the NNR of land down to shore of Loch Glass. At present the sources of regeneration seed are distant, and outwith the NNR which has no native woodland within the reduced boundary.

Support the landscape improvement through e.g. the removal of the isolated FCS forestry block on the west slopes, however would like to see further commitment to landscape improvement through forest edge management. Although this is the long term desired outcome of reducing grazing and browsing pressure through livestock and deer management, without a significant source of seed for regeneration, this is likely to be very very slow and certainly unlikely to see any change within the lifetime of the plan, or indeed the next one either. Consideration should be given to a more proactive approach to forest edge softening, particularly on the boundary of the plantation adjoining the NNR. This could be an opportunity to demonstrate best practice management and partnership between neighbouring land ownerships.

**Biodiversity (p8):** Objective 3 – to encourage biodiversity on the reserve, especially habitats and species that are nationally important

It is unclear what is meant by “to encourage greater biodiversity.” The establishment of non-native species would increase biodiversity, as has the spread of New Zealand Willow-herb (*Epilobium brunnescens*) into most mountainous areas in UK. Non-native trees are quite correctly to be removed under Objective 2. Some habitats, especially in the mountains, are relatively species poor. The MCofS suggests that SNH re-consider the statement whether it is appropriate to encourage or facilitate greater biodiversity in these habitats: alpine & subalpine heaths; montane acid grasslands.

The local community is an important geographical community to engage with. However, the non-geographical community of mountaineers (hill walkers, climbers and ski mountaineers) have a very important stake in Ben Wyvis as a popular location for all these activities and because mountaineers behaviour can affect the achievement of the aims of the NNR.

**Research (p10):** Objective 4 – to commission and support relevant research, survey, and monitoring on the reserve

The MCofS welcomes the preparation of an NVC map, and regards it as a matter of urgency with respect to providing a tool for gauging and pre-empting damage by activities such as ATVs and choice of preferred routes for path alignment. The key projects need to emphasise the importance of robust monitoring that will enable grazing and browsing impacts to be assessed and enable deer culls to be determined.

### **3. Management for People**

**Visitor facilities – access (p13):** Objective 5 – to provide facilities so that visitors can value and enjoy their visit to the reserve

As mentioned under objective 3, the mountaineering community has an important stake in Ben Wyvis, and as such the MCofS would be keen to assist in the good management through volunteer involvement. We are to be involved in a survey of routes taken on Ben Nevis in the near future, and could promote involvement in surveys as volunteers, such as noting route taken by walkers. The MCofS would also be available to work towards investigating ways to encourage people to follow when choosing between parallel routes.

It is unclear what the statement “to provide quality facilities,” means. This would benefit from a qualification so that people do not think that the objective is to provide visitor facilities on the

Reserve, and cannot be misconstrued to mean that there is an expectation of [toilets, seats, etc on the mountain](#). Similarly, the key project to “produce signage and publicity,” should be off the Reserve.

The ridge from An Cabar to the summit of Ben Wyvis is all above 900m and naturally has very thin soils. It is inevitable that “bare stone” will be exposed and that it will have “the appearance of a rough stone path.” It would take little use for this type of ground to reach this state, but will be considerably more robust than the vegetation previously present. The primary aim is rightly to confine this impact, and MCoFS supports this. To the key project to “prepare a simple and effective programme of monitoring,” should be added a commitment to implement it.

**The** “illegal use of scrambler bikes,” should be urgently assessed and action taken. Due to the vulnerability of the habitats and the ground to erosion consideration of what to do should take the minimum time possible; culprits identified and reported to the Police and access points identified and redesigned.

**Visitors – Information (p16):** Objective 6 – to provide information so that visitors enjoy their visit to the reserve

The MCoFS supports the commitment to information provision about the mountain environment not being on the open hill. We would be interested in assisting understanding of the NNR, and could do this through our magazine with a readership of about 10,000 and the website.

**Education (p17):** Objective 7 – to facilitate greater use of the Reserve by educational groups and provide relevant background information

It is unclear who is responsible for the “restricted to 600m unless accompanied by suitable qualified guides,” rule. It may be of benefit to clarify this.

#### **4. Property Management**

**Property Management (p19):** Objective 9 – to management the reserve responsibly using best practice

The MCoFS supports the commitment to “sympathetic” path work. We recognise it is a difficult balance between landscape impacts, design such that people will use the route and practicality of technique choice. The encouragement to report “unauthorised motor transport” to the police is difficult for the majority of walkers. They are likely to be unaware of what motorised vehicles have authorisation, indeed in terms of ATVs this difficulty has arisen and it seems unclear in some circumstances what is authorised and what is not. The MCoFS urges that authorisation / acceptability are reviewed and this applies to the SSSI, not just the NNR.

#### **Summary (p20)**

Mountaineering, which encompasses most activities that will take someone in a non-motorised manner up to the summit of Ben Wyvis, is an inherently risky activity as is encompassed by the internationally-used participation statement supported by MCoFS. “The MCoFS recognises that climbing and mountaineering are activities with a danger of personal injury or death. Participants in these activities should be aware of and accept these risks and be responsible for their own actions and involvement.” It therefore seems inappropriate to commit to maintain a mountain in a “safe condition.” The MCoFS would be concerned that the literal interpretation of this statement is really a reflection of the aims of management of Ben Wyvis, and in almost all circumstances would resist any actions to make a natural environment safer. More clarity is needed here and any commitment

to making the mountain safer should be removed. All promotional and interpretation material should remind visitors that it is a challenging environment where they are responsible for their safety.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus  
Access & Conservation Officer