



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

## FES Framework Strategic Plan 2008-2013

### Mountaineering Council of Scotland (MCoFS) Response

#### Introduction to MCoFS

The MCoFS is the Scottish Government recognised representative body for hill walkers, climbers and ski-tourers, which Visit Scotland statistics estimate as numbering 400,000 participants. We have 10,000 members, with 127 Scottish hill walking and climbing clubs affiliated. Our quarterly magazine *The Scottish Mountaineer* has a circulation of 15,000, and our website attracts huge interest in both Scotland and abroad. We are financed by membership subscriptions and receive investment from Sportscotland, Scottish Natural Heritage, Scottish Mountaineering Trust and the British Mountaineering Council.

#### Comments on Draft FES Framework Strategic Plan 2008-2013

##### Key Theme 3: Business Development (p20)

The MCoFS supports the diversification of economic activity, but renewable energy developments need to be managed very carefully. Most recognise that hard-edged forestry plantations are a detractor in the landscape, but at least trees are 'natural.' The potential effects of wind turbines on the landscape are huge and are obviously man-made objects and therefore in no way 'blend' into the landscape that plantation can to some extent when designed well. The MCoFS would welcome consultation on location guidelines similar to those in the UK Forestry Standard and Landscape Design Guidelines. Both these documents address the tree element of forest management, but there are important differences in the potential impact of trees and turbines. These need to be made explicit, open and accountable.

##### Key Theme 5: Access and Health (p29)

The MCoFS supports the aim of promoting health and well being. This section addresses access to forestry, but there is no recognition of the issue of access through forests. Forests can offer excellent access opportunity for those that wish to conduct their activities within a forest setting. However, they can also be a barrier to access and healthy activity if your choice is to do these activities on the open hill which may only be reached through a barrier of densely planted forest from the access point. This can be a common issue at some sites, especially when there has been a change of track location since the last OS map was printed. Many hill walkers have experienced great inconvenience in attempting to find their way to the hills or back in fading light. It can also be a safety issue. There is an excellent example of partnership work at Glenachulish (near Ballachulish) where it has been proposed to have a system of simple posts with an easily-recognised symbol to indicate the easiest route through the forest onto / back from the open hill above. The MCoFS would welcome something similar to be used Scotland-wide so that the symbol would become easily recognisable and understood. These posts could be moved relatively simply when

tracks are re-routed, created or no longer useable. There are potential issues of erosion pressure at exit / entrance points to the forests, due to the channelling effect, but this is likely to happen in any case with limited exit / entrance points in dense plantings. Issues such as this are likely to be best dealt with on a site specific basis.

#### Key Theme 6: Environmental Quality (p33)

The MCofS welcomes the mention of NSAs. As stated in the Plan, these are the ‘very best’ rather than a comprehensive or representative suite. The MCofS strongly supports the development of Managements Strategies for the NSAs, and in relevant NSAs, the forestry sector is well placed to be a lead partner in this process. However, landscape quality is not a concept that is effectively captured by boundaries. As NSAs are the “very best”, this means that much of the land in Scotland that has high value for its landscape is not designated, and this needs taken into consideration when making decisions about the national forest estate. The MCofS would encourage an explicit recognition of, and respect for, wild land qualities.

Action 6.04 states that the forest estate management should be “in line with FC Guidelines.” The FC Guidelines referred to in the landscape section (UK Forestry Standard and FC Landscape Design Guidelines) address factors for consideration in WGS grants and tree-specific management such as felling, restocking and forest restructuring. With the pressure to diversify into renewable developments, it is vital that guidelines are drafted and widely consulted upon in advance of this diversification. Although at the Inverness public consultation meeting it was stated that these guidelines equally apply to all operations on the national forest estate, it is difficult to see how these barely applicable guidelines can be applied across the whole forest estate in an equivalent manner without more relevant and clearer guidelines. It was further stated that some renewable developments were rejected by FES at an early stage. Without these internal criteria being publicly known, it is difficult to justify that comments received on this aspect of the Strategy are with the full understanding of the implications. A significant proportion of the forest estate is open land, and as such there needs to be clear guidelines for open and accountable policies relevant to this part of the estate in addition to the afforested areas.

#### Key Theme 7: Biodiversity (p39)

The MCofS supports the FCS landscape scale approach to ecological health, and the recognition of the importance of the open areas of the forest estate. In deer management, due to the landscape and access implications of fences, the MCofS would greatly support keeping the use of fences to a minimum. We recognise, however, that fences are sometimes essential: there needs to be clear guidelines for the frequency, location and design of access points through fences.

#### Priorities (p54)

The landscape quality of Scotland is what underlies much of the visitor-based economy of rural areas, hence it is vital to prioritise landscape considerations and integrate into management, not just of the trees. There is a strong need to balance potential implications of renewables developments and associated infrastructure such as tracks in the open area with the landscape implications. There is little point in improving the landscape impacts of activities such as planting, felling and forest design without being equally committed to preventing potential negative impacts of other developments.

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

Yours sincerely

Hebe Carus  
Access & Conservation Officer