



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493942
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

21/12/10

gail.rogerson@forestry.gsi.gov.uk

Dear Ms Rogerson

Rural Development Contract – Rural Priorities
Case Title: Glen Alladale Re-Wilding Habitat – Phase III
HIG-161894-4164652

Please accept these comments from the Mountaineering Council of Scotland (MCofS). We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski tourers. We have over 10,000 members and aim to represent the interests of all the 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment. The area of Alladale is a popular hill walking and climbing area. It is relatively wild despite the tracks and valuable for the landscape, visual amenity and biodiversity.

2.1 Objectives

We support restoration of native woodlands, but the process by which this is achieved must take into full consideration other effects such as on the landscape, recreational access and biodiversity.

2.2 Fencing

Fencing has a negative impact on landscape, visual amenity, recreational access, biodiversity and promotion of natural processes in the long-term.

This project as proposed involves a significant addition of extra fencing (5997m). Although this may appear to be off-set by the welcome removal of some fencing (6847m), the fencing to be added is in far wilder areas and more prominent positions away from existing developments than those of the sections to be removed. There is therefore visually a net loss of wildness. Additionally the new fencing is up to an altitude of 550m. At this height, tree establishment will be a challenge. We question the benefit of enclosing such an area when efforts would have greater chance of success at less challenging altitude along the glens. The MCofS recognises the importance of avoiding Black Grouse strikes, but the marking of fences that is necessitated by their existence at this location illustrates the knock-on effects on biodiversity. Without marking the fences there is a danger of loss of biodiversity through a significant rate of bird strikes, but marking the fencing (2193m) will have a significant impact through being visually very intrusive. This further illustrates the desire to achieve woodland regeneration without fencing if at all possible. For this reason the MCofS considers it far better to maintain levels of deer at sustainable levels without need for fencing as a method of achieving tree regeneration at this site. The alternatives of a non-fence project have not been considered in the application, and as such we would object to this going ahead without an appropriate assessment of this option.

Any new tracks, extensions to tracks or change of use from path to track would not be acceptable in connection with this project. Although such construction would be Permitted Development should

the woodland project go ahead, if tracks are to appear based on granting of this application we would strongly object on the basis primarily of landscape and visual amenity.

2.3 Ground Preparation

In a planting project of this size, it may be justified to mechanically mound/screef, but the visual impact of this technique is greatly affected by the size of bucket. There appears to be no specification of this. The MCofS would recommend that use of a maximum 30 cm wide bucket. This would minimise intrusion while maximising efficiency. The need for specifying this detail is illustrated by projects where larger buckets were used and led to very visually intrusive holes / mounds of 50 cm+ depth as occurred initially at Loch Clunie. These would be unacceptably intrusive. The project details state that, “visual sensitivity will be considered ... when choice of ground preparation is being considered,” but does not explain how the visual sensitivity will be reduced or the criteria where it may be considered necessary to adapt the ground preparation method. Due to the landscape value of this area, we would expect the precautionary principle be applied and ensured through the consent process.

2.12 Beating Up and Weeding

This is stated as being a commitment during the period of the contract, however this period is not stated. We would like to see this made explicit.

2.15 Deer

We welcome that any deer breaching the fence will be culled until the point at which the trees have established. There are however no stated plans for removing the fence after this time. At the point when the trees are established and deer within the fence are no longer culled, the fence is redundant. We would object to such a project without the commitment for the fence to be removed after woodland establishment. At this point there is no advantage to the fence and many disadvantages such as for landscape, access and biodiversity which may be argued was worthwhile during the woodland establishment phase, but certainly not after. A fence decommissioning plan must therefore be included in the project plan, and adhered to.

Conclusion

Due to the disadvantages of fencing stated above, the MCofS believes fencing should be the last resort, and there is no evidence of this approach in the project papers we have had sight of. We would therefore have to object to such a hugely intrusive project without assessment of the possibility of achieving the same objectives through controlling deer numbers. Should the project go ahead with fencing, we would object if this was done without a fence decommissioning provision for when the trees are established.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer