



# 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

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Louise.alexander@ckdgalbraith.co.uk

Dear Ms Alexander

## **Proposed New Coulin Estate Track**

Thank you for your request for input from the Mountaineering Council of Scotland (MCofS) regarding the EIA for the proposed new track at Coulin Estate. The MCofS is the representative body for hill walkers, climbers and ski tourers, and is the only national representative body of the sport of mountaineering in Scotland. We have 11,000 members, and are recognised by the Scottish Government as representing the interests of all mountaineers. The Torridon area is highly important for mountaineering and visitors travel significant distances to enjoy the wild landscape. As this proposal is at pre-scoping stage of the EIA, it is inappropriate for MCofS to make recommendations about the options at this point. We will therefore restrict comments to the issues and constraints we expect to see addressed in the EIA.

At the outset we would like to establish that the MCofS supports the restructuring of plantations and restoration of native woodland, however the benefits of these have to be balanced against any need for new, or upgrading of, infrastructure such as tracks. Relevant factors include impacts on landscape, visual amenity, perceived wildness and public access. Mitigation could include minimising the period of time of the impact (restoration plans), location choice dictating visibility from mountaineering routes, minimising the original specification of the track and management of access. Any trade-off between impact and benefit would have to clearly result in a positive outcome overall for a track to be acceptable.

To assess the visual impacts, the EIA needs to include an analysis of the visibility of these routes from important viewpoints, including the cumulative impact along routes and cumulatively across routes. There are four viewpoints MCofS consider are a high priorities for visualisation. These are all at a reasonably high altitude. By definition there will be an impact on walkers that are actually on a track, whether it was virgin ground or altered from a rough vehicle track. High altitude perspectives, however, will give a more expansive view, and allow view of the wild context and therefore a juxtaposition of a track and wildness. All but the last are in the National Scenic Area.

1. Spidean Coire nan Clach NG 965 596 (Beinn Eighe Munro peak)
2. Sgurr Dubh NG 979 557 (Corbett peak)
3. NG 990 599 (route up rim of Coire Domhain for traverse of Beinn Eighe or east partial traverse to Munro peak)
4. Sgurr na Feartaig NH 046 449 (Corbett ridge midpoint)

The impact on visual amenity and landscape can be mitigated in a range of ways. Using existing routes will generally have less impact as any "improvement" necessary to accommodate forestry vehicles would be an incremental impact. The visibility of a track from mountaineering routes,

particularly where these are perceived as wild routes, will be an important factor. The length of the track is also a factor in the magnitude of the impact. Another factor would be how well a route follows a natural linear feature such as along the edge of loch shores, rivers, etc. For all options, we would expect the EIA to address restoration or impact reduction after felling operations. We would also expect conclusion of discussions between FCS and the agents of the Estate regarding the minimal specification of the track that could be used for the necessary operations. The following section applies our concerns to the proposed routes, and it would be expected that the EIA would address these concerns.

### **Route 1 – Existing Estate Driveway**

This option follows an existing track, and fits with landscape features such as loch shore, so we are very disappointed to see this route has already been rejected without a full EIA. We consider this should be retained as an option for inclusion in the EIA.

### **Route 2 – Coulin Pass**

This is the longest option, but uses an existing track, although we accept that this would require “improvement” works. The EIA needs to address the possibility of width reduction and impact management for when felling operations are completed. This is a regularly used route for access, and accommodation would need to be made for continued access throughout construction, but this could be addressed through construction in sections of lengths where temporary diversion for the minimum time and area, as per the Land Reform (Scotland) Act 2003. The time of year of construction, signage and availability of public information would reduce impact on access.

### **Route 3 – Existing Pony Path Linking Torran and Ghiubhais Mhor**

Although this follows an existing path, there is only subtle existing impact on the ground. From any distance a track constructed along this line will appear to be on virgin ground. Additionally, this route does not follow natural linear features. The EIA needs to address the possibility of width reduction or full restoration and impact management for when felling operations are completed. This is an occasionally used route, and accommodation would need to be made for continued access throughout construction, but this could be addressed through construction in sections of lengths necessitating temporary diversion for the minimum time and area, as per the Land Reform (Scotland) Act 2003. The time of year of construction, signage and availability of public information would reduce impact on access.

### **Route 4 - New Forest Road Linking Torran and Ghiubhais Mhor**

Although this is the shortest route, the route is over virgin open ground. This route does not follow natural linear features. The EIA needs to address the possibility of width reduction or full restoration and impact management for when felling operations are completed. The relative visibility of this and the similarly routed option of Route 3 would expect to be part of the EIA analysis through the visualisations.

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

Yours sincerely

Hebe Carus (Ms)  
Access & Conservation Officer

CC. Nicola.tallach@snh.gov.uk