

Mr Andrew Painting
Conservation Officer
National Trust for Scotland
Mar Lodge Estate
Braemar

13 May 2022

Dear Andrew

Mar Lodge Estate National Nature Reserve Action Plan 2022 – 2027 – consultation draft

Thank you for the opportunity to comment on the draft Management Plan for Mar Lodge Estate. The Estate is an environment that is attractive for many of our members; for walking and camping, climbing and snowsports touring. As an important location for our members' activities, we take an interest in how the land is managed for its wild qualities and for recreational access to mountaineering destinations.

We are supportive of the way that the Estate is currently managed and welcome a continuation of these management objectives.

As your consultation document clearly explains, the National Trust for Scotland has a number of different objectives to address on Mar Lodge Estate, which may either compete with or complement each other at different times and locations.

At a strategic policy level, Mountaineering Scotland supports landscape and wildlife conservation policies that encourage and balance land management, wildlife and wildness in a sustainable way, and that lead towards creating a more abundant and wilder environment for the benefit of nature and people. We encourage initiatives that result in greater habitat diversity and connectivity.

We welcome your explicit acknowledgement in the Estate Management Principles of the Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code and, and the rights and responsibilities that they entail.

The wild qualities of the landscape are appreciated by the majority of our members and we support policy objectives that counter or reduce potential impacts where the wild qualities of land, as perceived by walkers, climbers and ski tourers, may be at risk of being eroded, damaged or lost. We place particular importance around summits and the views from them, including the routes to and from them and other recreational destinations.

We support the regeneration of native woodlands and scrub where the land can naturally support them, for climate change and biodiversity objectives, and the establishment of natural tree lines in Scotland's mountains is encouraged. This latter objective will need careful communication to the hillwalking community, as there are perceptions that trees at higher altitudes will interrupt the long views that are valued by walkers.

Mountaineering Scotland supports rewilding initiatives to restore natural ecological processes in Wild Land Areas, and sites designated for nature conservation. This includes peatland restoration initiatives for carbon sequestration and water flow management, and associated wildlife benefits.

We support policies that indicate that infrastructure used for land management in the uplands, specifically fencing and tracks, be avoided where possible and be kept to a minimum where it is demonstrated to be necessary.

The number of participants in hill walking, climbing and snow sports activities, along with other outdoor recreational activities, has increased in recent years as you note in your draft Plan. These activities, although individually of light impact can, when all added up, put stresses on upland environments.

As a result, responsible use of the uplands by recreational visitors is an important part of conservation of the environment and we support objectives that communicate the ethos of responsible behaviour while taking access. This includes wild camping and the lighting of campfires, and disturbance of wildlife at critical breeding times.

We note that visitor management of paths and tracks may be implemented at times and understand your need to balance interests. We trust that messaging would not require walkers to 'keep to the path'. Many walkers will follow a path if it takes them to their destination, and will appreciate well-maintained paths that fit with the landscape. However, others prefer to explore their own routes and we support your acknowledgement that the access legislation and guidance allows for that activity.

Any requests to restrict walkers to set paths should be proportionate to the requirement and limited in extent and duration necessary to achieve the intention, with reasons carefully explained.

We agree that sharing with the public an appreciation of the issues involved in managing the Estate as a wild land area, through appropriate interpretation and education, is an essential part of sensitive land management.

Monitoring is essential for evidence-based management interventions, be they for habitat and wildlife abundance and distribution or the actual impacts of people on environment and landscape.

We hope that our comments on your consultative draft of the Mar Lodge Estate Management Plan for 2022-27 are helpful to you as you take the Plan forward.

Yours sincerely



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