

By email to: [georgie.brown@treestory.org.uk](mailto:georgie.brown@treestory.org.uk)

Georgie Brown  
Forestry Consultant  
Treestory Ltd

28 July 2021

Dear Georgie

### **RSPB Abernethy Woodland Creation Consultation**

Thank you for the opportunity to comment on the RSPB Abernethy Reserve Woodland Creation EIA Scoping Report.

#### **Introduction**

Mountaineering Scotland is a membership organisation with more than 14,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.

Our interests lie generally with the effect on the proposals on the mountain landscape of the Cairngorms National Park, and specifically on The Cairngorm Mountains National Scenic Area and the Cairngorms Wild Land Area, and along routes to mountain summits and climbing crags. Comments are based on an appraisal of the proposals assessed against our Conservation Strategy policy: <https://www.mountaineering.scot/conservation/policies/conservation-strategy>

#### **Assessment**

Mountaineering Scotland will support activities that lead towards creating a richer and wilder environment for the benefit of nature and people. This includes native woodland management and expansion, and especially the regeneration of native woodlands and scrub where the land can naturally support them.

In Wild Land Areas, and sites designated for nature conservation in mountaineering areas we will support rewilding initiatives to restore natural ecological processes.

We advocate 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.

From the information provided in the Consultation Documents, it is our understanding that this initiative is intended to 'jump start' the natural regeneration of trees in the landscape by artificially

providing regeneration niches, from locally gathered seed sources, some grown to trees and planted out, to act as small islands of woodland in the landscape.

We support the vision to create a semi-natural woodland linkage up Strath Nethy to Loch Avon and over the watershed with Mar Lodge, and that no new fencing will be used to achieve this. Fencing can create problems for recreational access if crossing points are not frequent, and it has a visual impact in the landscape, detracting from the wild qualities of the mountains. We support effective deer management as a solution for enabling tree growth.

The Consultation Document is silent on whether tree tubes will be used to protect and establish the planted trees, but it does state that “establishment methods will be low impact”. We hope this means that no tree tubes will be used as 100,000 tree tubes would certainly have an adverse visual impact on the Wild Land Area and National Scenic Area.

Evidence from existing tree regeneration initiatives within the region, such as Creag Meagaidh NNR and Glen Feshie Estate, have achieved tree growth without supplementary planting – rewilding as in letting natural processes dictate the distribution and density of the tree species mix. However, this is dependent on having a viable soil seed bank and browsing from small wild mammals at a low level. The Allt Mullach Birchwood proposal identifies this as a limiting issue. It is not clear in the supporting information if this is an issue for the Strategic Seed Source Creation project.

However, since the seed source is local, planting is dispersed, and maintained by managing wild herbivores without the use of fencing to achieve a self-sustaining system, this initiative does have a rewilding ambition, which we support.

There is no mention in the consultation document about the means of transporting the trees for planting and if new or upgraded tracks will be required for this and for the screening and vegetation cutting. We would hope that existing routes would be of sufficient standard to enable transportation of equipment and personnel, and that any upgrading work or erosion remediation be notified to the planning authority through Prior Notification.

Please do contact me if you wish to explore further any of the comments above.

Yours sincerely



**Davie Black**  
**Access & Conservation Officer**  
**Mountaineering Scotland**

**T: 07555 769325**

**E: [access@mountaineering.scot](mailto:access@mountaineering.scot)**

