



The Granary
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Tel: 01738 493 942

By email to
planning@cairngorms.co.uk

17 May 2019

Dear Sir/Madam

Retrospective resurfacing of hill track. Land 2890M NW Of Carn Sgulain, Newtonmore

Reference Number: 2019/0121/DET

Mountaineering Scotland **objects** to this retrospective planning application for the following reasons.

1. There are two separate proposals bundled together in one retrospective application. The determination of work already done has to be assessed against what would be acceptable specification for track management in this location. The proposed upgrading of a further section needs similar but separate scrutiny.
2. The application has insufficient detail to allow proper assessment of what is proposed.
3. There is no indication of any potential visual impact of track extension work from the nearby Munros - A'Chailleach and Carn Sgulain - and other hilltops and importantly the routes to and from them.

Mountaineering Scotland is a membership organisation with over 13,000 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, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

We welcome the call in of this proposal by CNPA as construction work of this nature should be properly scrutinised. Unfortunately, the applicant has provided little detail to enable proper scrutiny of the potential visual impacts.

We ask the Cairngorm National Park Authority to set and apply a clear standard for all planning applications for constructed roads and tracks in moorland. A construction method statement usually accompanies such applications detailing techniques for different sections of land. Also, for ground preparation and restoration; identifying soil stripping and storage technique if appropriate.

This application fails to set out the estate's programme of road and track management, nor does it address its impact on the Park's special qualities. The plans need to identify the operational need for the track and the minimum track specification to accomplish this. In this environment the track

needs to be the minimum width it can be, with a central strip of vegetation sown to reduce the immediate visual impact.

The impact of track management on recreational interests has not been addressed. The visibility on routes to and from the nearby Munros needs to be assessed. It may or may not have a significant impact, but that has not been demonstrated.

We call on the CNPA to refuse this application and request a submission that is of a comparable standard for other constructed tracks that come under the planning system.

Yours sincerely



A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a large, looped initial 'D'.

Davie Black
Access & Conservation Officer
Mountaineering Scotland