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Mr Ian Collier
Woodland Officer
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24 November 2020

Dear Mr Collier

Ard Trilleachan SSSI Forestry Grant Scheme Consultation

Case Number: 20FGS53892

Thank you for the opportunity to comment on the proposed FGS application.

1. Our interests lie with access through forestry and woodland blocks to the open high ground, and the visual implications on the landscape of restocking and other management.
2. Mountaineering Scotland is a membership organisation with almost 15,000 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
3. We welcome and support the intention to allow the remnants of native woodland on the hillside to expand through natural regeneration.
4. Many of our members welcome more tree cover on the hills, but there is also a significant percentage who appreciate the open views from hillsides and are concerned that increasing woodland cover would obstruct these wide and long views. Encouraging more natural regeneration would allow trees to grow naturally where they can, and may result in a more open, scattered appearance rather than the more regular and enclosed appearance of planted woodland. This would allow woodland cover to reach a natural treeline and preserve views through the trees.
5. This of course depends very much on the impact of herbivores like sheep and deer and the means to control their impact. We are of the opinion that the landscape and biodiversity would benefit from limiting the number of deer per square kilometre to allow for natural tree and shrub regeneration. This also has climate mitigation benefits through carbon storage and sequestration in the landscape.



6. The visual impact on the landscape of fenced enclosures for woodland regeneration can be quite pronounced as tree and shrub growth proceeds unchecked, while outside the fence browsing maintains much less structural diversity in the vegetation. This may have an impact on views across the loch from Ben Starav, a popular Munro.

7. Our preference would be to manage this through sustained deer culling rather than the use of lengths of deer fencing. There are examples in other estates in Scotland where vegetation is recovering through management of herbivores without resorting to fencing. Creag Meagaidh as a National Nature Reserve is a good example of how this may be achieved on Designated Sites.

8. You are aware that Trilleachan Slabs is a popular climbing location and that climbers will take access from the lochside road at the landing stage and along an informal, boggy route up to the Slabs. This runs close to Compartment 1 and the Woodland Creation Operational Plan indicates that any fence that is erected will be kept a minimum of 5m back from the path. We support this measure if deer fencing is constructed.

9. If stretches of deer fence are required, then it may be useful to take note that the Scottish Outdoor Access Code advises that putting up a high fence over long stretches of open country without providing gates, gaps or other access points might be considered unreasonable (SOAC section 4.9).

8. Mountaineering Scotland suggests that in general, to facilitate recreational access, crossings should be provided at regular intervals so that the public do not have to make unreasonable detours. Where use is relatively infrequent it would be reasonable to provide crossings every kilometre. Crossing points should be clearly visible to the public. Arrows on the fence, indicating the direction to the nearest crossing would make it easier for them to be located, and especially in poor visibility. Away from paths or tracks stiles would be adequate for crossing, especially where the terrain is rough or remote

I hope these comments are useful to you in your consideration of the Land Management Plan

Yours sincerely



D. Black

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