

By email to: LostForest@scottishwoodlands.co.uk

Ms Megan Parker
Scottish Woodlands
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Dear Ms Parker

Consultation Request for Lost Forest Woodland Creation

Thank you for the opportunity to comment on this proposal for the Lost Forest on Kinrara Estate.

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 of development proposals on upland landscapes and recreational access to them, specifically on Wild Land Areas and areas designated for scenic beauty and wildlife conservation, 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>

Context

From the information provided in the consultation documents it is our understanding that this is a tree-planting initiative, intended to address both the climate and biodiversity crises with the encouragement of trees on the estate and avoiding planting on peat, and to maintain recreational access on the estate.

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 when other means are not feasible.

Observations

We believe that the establishment of natural tree lines in Scotland's mountains is to be encouraged and we support the intention of the landowner to create a woodland environment that stores carbon and supports wildlife.

Regarding the planting proposals, 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 woodland plantation 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 straighter rows and blocks of planting schemes. This would allow woodland cover to reach a natural treeline and preserve views through the trees.

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. Our preference would be to manage this through deer culling rather than the use of lengths of deer fencing. Where fencing is necessary, we would expect recreational access to be maintained in line with the guidance given in the Scottish Outdoor Access Code.

The document states, as a Key Proposal, that there will be "Unimpeded public access in line with the Outdoor Access Code". 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 (section 4.9, bullet point 4). We ask you to consider how long a section can be without access across it before it is an unreasonable obstruction to lawful outdoor recreational access.

We suggest that gates be provided where the fence crosses paths or tracks, or informal routes used to walk or cycle to summits and tops. Crossing points need to be provided at places where people are likely to need to cross the fence, such as hilltops, ridgelines, side ridges where they meet the main ridge, and places where the fence changes direction. Away from paths or tracks we think that stiles would be adequate for crossing, especially where the terrain is rough or remote.

We suggest widening the scope of the proposed peatland survey to include a survey of muir grips, and plan to block significant peatland drainage channels through NatureScot's Peatland Action programme. This would assist Sphagnum moss growth and future peat accumulation, and would be an important benefit for carbon sequestration.

In conclusion, we are supportive of proposals that make a positive contribution to mitigating both the climate and biodiversity crises, and we trust that you find these comments helpful in your further consideration of this proposal.

Yours sincerely



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