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By email to <a>Ben.Griffin@forestry.gsi.gov.uk

Ben Griffin Planning Forester Inverness, Ross and Skye Forest District Tower Road Smithton Inverness IV2 7NL

Dear Mr Griffin

Proposed Glen Brittle Land Management Plan 2017-2027

1. Introduction

With over 14,000 members, Mountaineering Scotland 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 also act on behalf of the 85,000 members of the BMC (British Mountaineering Council) on matters related to landscape and access in Scotland, and provide training and information to mountain users to promote safety, self-reliance and the responsible enjoyment of our mountain environment.

Mountaineering Scotland and the BMC are joint trustees of the Glen Brittle War Memorial Hut and have a long-standing appreciation and commitment to the area which is the subject of this proposal.

2. Landscape

The proposed LMP relates to the Minginish Peninsula on the west coast of Skye for the period 2017 to 2027. The forest is made up of two hills, An Cruachan and Beinn a' Bhràghad, separated by Bealach Brittle. Part of the area (the east face) is highly visible from Glen Brittle and the iconic Cuillin ridge, a National Scenic Area popular with walkers and climbers.

Mountaineering Scotland wholly supports the principle of woodland regeneration and in particular the development of native woodlands and the replacement or removal of non-native species. It is noted favourably that the LMP is sensitive to the landscape in the felling and restocking of the east face, for example by removing some remaining areas of clearfell and removing straight and defined edges from the restock boundaries. It is also positive that an area prone to landslide will be established with mixed broadleaves (not for harvest) to help stabilize the ground. The LMP seeks to diversify the tree species present as currently just two species dominate (91 % being Sitka spruce and Lodgepole pine with only 4 % of the forested area being mixed broadleaves).

We note that on the Glen Brittle side the forest will be edged with native species and would hope to see this regime extended further NE following the road. However, much of the forest above this will still be seen as a mono-culture which we find regrettable, given the context and popularity of the area with a wide range of outdoor recreation pursuits and tourists.

We also welcome the stated intention to re-establish peatland and to further the protection and improvement of habitat for eagles.

It is assumed the quarry mentioned in the proposal is centered on NG415269. This may have a visual impact depending on the area of exploitation and any potential screening, and we would appreciate an opportunity for further comment if it is likely to be re-opened.

We assume that the proposed link road to the Bealach Brittle would be a continuation of the current track ending at NG394244. As such it is unlikely to have any additional visual impact. It is hoped any other tracks considered will be constructed to minimise visual impact, particularly from The Cuillin.

We note in passing that the proposal to mimic forests of the Pacific Northwest in the South West block and wonder why this is considered relevant within a Scottish context.

3. Access

A positive aspect of the LMP is the objective of access, namely to "Help visitors to experience and enjoy the outdoor environment, encourage use of the estate for health benefits and outdoor learning."

The context of the LMP is that visitors to the area have a statutory right of access so long as they are acting responsibly and in compliance with the SOAC. This right of access is not restricted to built roads and paths, and this should be acknowledged in the LMP. Furthermore, the LMP should address how public access will be managed during forestry operations. For example, there should be planning for and provision of alternative routes during forestry operations, and clear signage where there is a need for people to be directed to alternative routes, provided at car parks or other access points. Staff undertaking forestry operations should be fully briefed regarding any diversions that may need to be put in place. It is assumed that all measures put in place will adhere to industry-approved good practice guidelines with respect to managing work sites where people are exercising their access rights, in particular the "Managing woodland access and forest operations in Scotland" leaflet. Mountaineering Scotland is happy to publicise revised access arrangements, assuming the alternatives fulfil all relevant guidelines and comply with the SOAC.

The LMP outlines proposals for expanding car parking facilities in Glen Brittle and we welcome this, as we understand from our contacts with residents and members of both Mountaineering Scotland and the BMC that the situation with cars parked on verges at the Fairy Pools is arguably out of control. Clearly the promotion of the location as a tourist destination has taken place without due consideration of the associated impact on the environment and limited facilities.

We would expect the that the existing footpath amenities provided (e.g. yellow and blue walks) will be maintained during the planned works.

4. Conclusion

There are many positive aspects to the LMP but we also hope that our suggestions for taking further action to limit mono-culture planting will be fully considered before the plan is finalised.

Yours sincerely

David Gibson CEO Mountaineering Scotland