

AGENDA ITEM 5

APPENDIX 3C

2019/0247/DET

REPRESENTATIONS - GENERAL



The Granary
West Mill Street
Perth PH1 5QP

By email to
planning@cairngorms.co.uk

16 August 2019

Dear Sir/Madam

**Engineering works to smooth and re-grade land | Cairngorm Mountain Glenmore Aviemore
Highland PH22 1RB**

Reference Number: 2019/0247/DET

Mountaineering Scotland wishes to comment on aspects of this proposal that raise concerns about its environmental impact and the visual effects of this.

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 Cairngorms National Park Authority as construction work of this nature should be properly scrutinised. Unfortunately, we are of the opinion that the applicant has provided insufficient detail to enable proper scrutiny of the potential visual and environmental impacts.

Our first point is that the Cairngorms National Park Authority has stated that all works for the ski area should be part of a development masterplan, which Highlands and Islands Enterprise has agreed to. Yet this proposal comes in advance of such masterplanning – there is no context within which to assess this proposal. We urge the Park Authority to postpone the assessment of this proposal until the Masterplan has been consulted upon and agreed.

Our second point is that the Working with the Environment at Cairngorm document produced by HIE sets the context for development work in this very sensitive environment. It states that "special principles and practices are needed to mitigate damage during construction and management operations on the Estate and in the ski area." It is our opinion that the proposal documents do not provide the special principles and practices that you require as Planning Authority.

A construction method statement usually accompanies such applications detailing techniques for different sections of land. Each section will require more detail on working practices and the working corridor, how construction traffic gets to and from hard standing areas, soil conservation measures and reseeded procedures, for example.

Our third point is that the timing of the proposed management works requires careful consideration to avoid leaving an unfinished and unvegetated surface that would look unsightly and be prone to erosion. The potential for soil compaction and the time needed for revegetation are key considerations given the exposure and short growing season. An Ecological Clerk of Works and

even a Landscape Clerk of Works, given the sensitivity of the location and the current condition of the ski area, are essential.

I hope that you find our comments helpful and if you have any doubts at all on the probability of an appropriate outcome in the landscape being achieved, then we would welcome and support a refusal of this proposal.

Yours sincerely



Davie Black
Access & Conservation Officer
Mountaineering Scotland