



Cairngorms
National Park Authority

Ùghdarras Pàirc Nàiseanta a'
Mhonaidh Ruaidh

Item 6 Appendix 3 28 April 2023

Agenda item 6

Appendix 3

2022/0421/DET

Representations

Objections

Comments for Planning Application 2022/0421/DET

Application Summary

Application Number: 2022/0421/DET

Address: Land 760M NW Of Riseley Cottage Glen Road Newtonmore

Proposal: Construction of 4.83km forestry track, formation of passing places, renewal of bridge

Case Officer: Edward Swales

Customer Details

Name: [REDACTED]

Address: [REDACTED]

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am writing on behalf of the North East Mountain Trust (NEMT). NEMT represents the interests of hill-goers and those who enjoy visiting wild land. NEMT membership, comprising twelve hillwalking and climbing clubs along with individual members, totals around 1000 people. NEMT is pleased that the National Park has called this application in as it needs to be tested against the Park's hill tracks policy. This application is the resubmission of a previous application with minor changes to the line of the track and fuller information about potential tree planting in the area. NEMT objects to the section of track which heads north from the Glen Banchor public road and crosses open moorland.

NEMT's overriding concern is the question of the need for the track and its purpose along with the negative landscape impact. The stated purpose of this track is to remove timber from four relatively small plantations affected by wind blow. The application is based on the likelihood that normal timber lorries will be unable to negotiate the public road down the glen. The application does not say why small vehicles could not be used to remove the relative low volumes of timber involved, perhaps with some temporary alterations to Glenbanchor Road, as suggested for the upper section of the road. NEMT understands that Wildland Ltd is using small vehicles on narrow tracks to remove cut timber elsewhere in the Cairngorms National Park. NEMT raised this in respect of the previous application and it is not addressed in the current application. NEMT strongly supports the proposed increase in woodland cover on both estates; however the areas identified are adjacent to the public road and planting work should not need large vehicles.

NEMT is also concerned about the following:

It is unclear why the proposed track crosses the Strone track and goes further east when presumably the Strone track would be used for extracting the timber.

The Design Statement says that the proposed new track does not provide access to shooting butts but the Ordnance Survey map marks butts just north of one section of it.

This track will have a very significant detrimental impact in landscape terms where it traverses

open moorland. The sheer width of the track (logging width), the numerous unsightly passing places and fact that, at its southern end, it will run beside the existing 'dog track', thus creating two parallel roads, combine to create a very negative visual impact.

The design statement says that the new track will improve community/public access and general amenity. However this is not the case as the area is well served by paths and tracks already. It is not clear what 'general amenity' means.

It is stated that one existing borrow pit will be used as necessary. It appears likely considerable amount of material will need to be taken from this and there is no information in the application about where this is and how it will be reinstated.

The CNPA's hill tracks policy contains a presumption against new tracks in open moorland (much of this track is new) except where there are no alternatives for carrying out essential estate management tasks. NEMT thinks that the removal of the timber from the existing smallish stands and the proposed new planting can be carried out without this track and so it should not be approved. In addition the policy signals that, when there are no alternatives to a new track, there is an expectation of compensatory measures such as the removal of tracks elsewhere. No compensatory measures are proposed.

If the Park Authority considers that, even with small vehicles, the timber cannot be extracted using the Glenbachor Road, then NEMT suggests that a condition of consent be the complete removal of the new section of track, along with reinstatement of the ground, once timber extraction is complete. Creation of the new plantations is very unlikely to require the proposed track.

Comments for Planning Application 2022/0421/DET

Application Summary

Application Number: 2022/0421/DET

Address: Land 760M NW Of Riseley Cottage Glen Road Newtonmore

Proposal: Construction of 4.83km forestry track, formation of passing places, renewal of bridge

Case Officer: Edward Swales

Customer Details

Name: [REDACTED]

Address: [REDACTED]

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to register my objection to this planning proposal.

This road will create an enormous, ugly scar and will enable the driving of multiple, polluting, large SUVs and ATVs over currently relatively unspoiled land. It is apparent to me that the real reason for the estate wishing to build this road is not primarily for timber extraction, but to facilitate estate management for intensive grouse, partridge and pheasant shooting. It will also be used for the estate owner and his guests to drive over to Glen Banchor without driving through Kingussie and Newtonmore. The size and scope of this plan shows it is clearly a road which will be constructed in open moorland, and not a forest track. The existing public roads combined with the already extensive network of tracks on the estate affords sufficient access to estate staff to get from Pitmain to Glen Banchor and perform estate management work.

Even if a new track is deemed to be required for timber extraction, it should be on the condition that it is only for use until the timber extraction/woodland management project is completed. Once this is done, within a specified time-limited period, the land should then be restored to its original condition. However, even for this use it is hard to justify as the existing public road could be used if attention was paid to modifying the way the timber extraction is managed. Smaller timber lorries could negotiate the bends in Glen Road and the extra cost to the estate of using smaller vehicles would be minor compared to the costs of constructing a new 4.83 km road.

There is no doubt that villagers in Newtonmore would be adversely impacted by the passage of multiple lorries but this would be for a limited time, and, speaking as one of those impacted, I would prefer that temporary disruption along the existing Glen Road to a permanent disfiguring of the open moorland and the disturbance to wader breeding habitat.

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Proposal: Construction of 4.83km forestry track, formation of passing places, renewal of bridge

Case Officer: Edward Swales

Customer Details



Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to this application for the reasons I set out in a blog post

<https://parkswatchscotland.co.uk/2022/12/21/hill-roads-and-sporting-estates-the-glen-banchor-pitmain-forestry-bypass-is-back/> which are, in summary:

- 1) There is no justification for this road. Much of the timber it is claimed needs to be extracted is valueless. The swept analysis, while identifying potential safety concerns about large lorries using the public road does not explain why these could not be addressed or why small vehicles could not be used.
- 2) The landscape impact is significant and the creation of a road round the back of Newtonmore contrary to the CNPA's policy presumption against new roads on moorland. Among the landscape impacts are: there would now be TWO roads by the esker, the dog track and the proposed road; the road will require significant cuttings which will be highly visible; the width of the proposed road corridor is double the width of the road itself and that should be used to assess the landscape impact; the junctions etc are far wider than necessary adding to the landscape impact.
- 3) The documentation in the planning application is internally inconsistent with a different line for the road contained in the Woodland Management Plan which is not totally out of date and does not reflect the woodland creation in Glen Banchor
- 4) The road will release significant amounts of carbon in its construction not least because part of it is constructed over/through peat
- 5) Why the CNPA would even consider allowing Pitmain Estate to re-submit a planning application for a new road when they have so far failed to restore the damage created by the Gynack overflow is unclear



To: Planning Officer, Cairngorms National Park

From 

8 Jan 2023

Planning application 2022/0421/DET

Construction of 4.83km forestry track, formation of passing places, renewal of bridge

Land 760M NW of Riseley Cottage, Glen Road, Newtonmore

I wish to object to the above planning application on the same grounds that I objected to the original planning application for this proposed development. My objection letter of 15 Feb 2022 is provided below as annex 1.

I now wish to make the following additional points:

1. The original proposal has not been modified significantly to diminish in any way the grounds for my objection in Feb 2022 and these objections remain the basis for my objections to the current planning application. Although the alignment of the road is lower across the hillside it would have the same massive impact on an area of relatively unspoilt wild land character, both in terms of negative effects on the landscape and degrading amenity value. The visual representations using computer simulation in the new planning application are of negligible value but their replacement with actual photographs, with the proposed road alignment superimposed, would make no difference – any site inspection would demonstrate that this proposed development would be highly intrusive in this type of landscape, whatever alignment was chosen.

2. The applicant has presented no new evidence to suggest that there are overriding reasons, from an estate management perspective, to override the existing CNPA policies which presume against the construction of new hill roads or any other CNPA policies designed to protect landscape value and to mitigate impacts relating to climate change and biodiversity protection needs.

3. The last 11 months have simply reinforced the points that I made in Feb 2022 that, from a timber extraction perspective, transportation of such timber down Glen Rd is perfectly feasible using appropriately sized vehicles, with good turning capacity, plus minor modifications such as possible verge strengthening in a few locations. Any issues relating to wires crossing the road, as noted in the latest planning application, can be easily dealt with by ensuring that load heights are not too great. As I have observed on occasions large vehicles of considerable height use Glen Road, including the normal Council refuse vehicles, so I cannot see why the applicant appears unable to source appropriate forestry vehicles if indeed there is a real intention to extract timber from existing plantations in Glen Banchor.

4. I would also like to draw your attention to this film which documents recent riverine conservation work along the River Calder in Glen Banchor which involved the transportation of mature trees to the river bank and placement of root plates and sections of trunk into the river: [Renaturalising the Calder - YouTube](#). Note the comments made in this film at 1.2 min by Duncan Ferguson, Operations Manager for the Spey Fisheries Board who describes these trees as coming from “plantations that are worthless and are coming down anyway”. This reinforces the view that the existing forest plantations in Glen Banchor are of limited commercial value whose extraction on timber vehicles would yield less financial benefit than the costs of constructing this proposed hill road. Instead the main value of the plantations is probably their retention as winter feed and shelter areas for the large red deer populations in this area, along with use of some of the timber for local firewood needs, fence posts etc.

5. The obvious conclusion remains - the primary purpose of this proposed hill road is for the transportation of shooting clients visiting the Glen Banchor and Pitmain estates and for estate management purposes. All these needs can be met by using the existing hill tracks plus the public road network in and around

Newtonmore. Whilst it might be a little more convenient for clients and estate staff to drive back and forth along the proposed new hill road this is in no way a good enough reason to override existing CNPA policies relating to environmental protection and enjoyment and to set a precedent that would compromise CNPA action on hill tracks in the rest of the national park.

If this planning application proceeds further to planning committee consideration I would like to address the committee in support of my objections.

Many thanks



Annex 1 Planning objection submitted in Feb 2022



To: Planning Officer, Cairngorms National Park



15 Feb 2022

Planning application 2022/0010/DET. Construction of 4.83 Km of forestry track; upgrade of existing sheep dog trial track; and alterations to Glenbanchor Road, Newtonmore

I wish to object to the above planning application on the grounds that the proposals are contrary to policies contained within the Cairngorms National Park's Local Development Plan.

My specific objections are as follows:

The proposed development is inappropriate for an area with such high landscape and natural heritage values. These are important for the residents of Badenoch and Strathspey, particularly those living in or near the settlements of Kingussie and Newtonmore and for persons visiting from further afield. Such values underpin the experience of all who enjoy outdoor recreation, study and exercise in wild and relatively natural places. The landscape character and special qualities of this tract of land on the Pitmain and Glen Banchor estates would be degraded by the proposed hill road construction, impacting as it would on both landscape value and public enjoyment. The proposed development is therefore contrary to Policy 5.1, Special Landscape Qualities which states: “There will be a presumption against any development that does not conserve or enhance the landscape character and special landscape qualities of the Cairngorms National Park including wildness and the setting of the proposed development”. The proposed new road would be a permanent feature and have a negative impact on the landscape. This cannot be justified given that there is an obvious alternative option for extracting timber from Glen Banchor, using all of Glen Road, along with minor modification of that road as well as the use of appropriate vehicles to transport the timber. This would cause only temporary inconvenience to residents and other users of Glen Rd.

The proposed development is also contrary to Policy 5.2, Private roads and ways, which states: “There will be a presumption against new private ways in open moorland areas”. The proposed new hill road is entirely located on open moorland and does not meet any of the three conditions that could override this policy requirement: The proposed road is not “essential” for land management purposes; it would do nothing to “conserve and enhance the landscape character and special landscape qualities of the National Park including wildness”; it is not part of a “programme of works including the removal of other existing private roads and ways to deliver a net benefit for the special landscape qualities of the National Park including wildness”. The proposed development would involve no removal of any other road or track.

The proposed development is also contrary to Policy 10.7, Carbon sinks and stores, which states: “Development affecting carbon sinks, particularly soil and peat, should: a) protect all soil and peat from commercial extraction; and

b) minimise disturbance of soils, peat and any associated vegetation; and c) include an assessment of the likely effects of development on greenhouse gas emissions and identify appropriate mitigation measures to minimise the release of stored carbon as a result of disturbance". The applicant appears to have made no attempt to address this policy requirement and clearly fails to comply with points b) and c). The proposed construction of 4.83 kms of new road across moorland is not in any way "minimising" disturbance to vegetation, soils and peat, while greenhouse gas emissions would also far exceed the alternative use of Glen Rd, when minor amendments to the road periphery, combined with better vehicle transport, is a practical alternative.

Additional Points:

The proposed development is in an area of undulating moorland which lies above Newtonmore and separates the village from the steeper slopes of the Monadhliath mountain range. It is close to the periphery of Newtonmore but is visually isolated from this village and nearby Kingussie through being at a higher elevation. This contributes significantly to the feelings of wildness and remoteness when traversing the area. These values are reinforced by the absence of motorised vehicles, except occasionally on existing tracks, and the lack of any traffic noise from the villages or public road network. The surrounding vegetation is mainly an extensive complex of bog, moorland and native birchwood. These semi natural habitats cover moraines, ridges, lochans and associated landforms which have existed here for thousands of years, since the last Ice Age. Beyond the moor are the crags, cliffs, and high montane slopes of the Monadhliath. All provide a strong connection to the natural landscape alongside wildlife rich habitats. These experiences are available to all sectors of the population, of all ages, and including those with limited mobility. With the existing public road system close by, this wild landscape is available to everyone, from those who want to explore its inner heart to those who simply want to observe from the edge.

An important feature of the proposed development area is a relative lack of artificial features associated with human habitation. There are no houses, no powerlines, masts or other structures either within or easily visible from the area. From within the area there are extensive views towards all points of the compass, from Creag Dubh and further hills to the west, from Drumochter in

the south and round to the main Cairngorms massif in the east and finally to the hill slopes above Kingussie as they merge into the main backbone of the Monadhliath to the north. The views down onto the area from nearby hill slopes illustrate a relatively wild landscape distinct from the intensively farmed and settled areas close by the River Spey to the east. It is difficult to think of any other settlement in the National Park which has such a high quality wild landscape virtually on the doorstep and one which is so accessible. This is a significant contributing factor to the high levels of public use of this area, particularly from Glen Road and the Strone Road above Newtonmore and from the trail network adjacent to Kingussie. Equally important is public use of the Wildcat Trail which encircles Newtonmore and is a major tourism facility. The northern side of this trail looks across the wild, undulating moorland towards the proposed new road, with extensive views to the mountains beyond. A vast network of animal tracks, created by sheep and deer, traverses the proposed development area, providing ample opportunity for those who want to explore off the main trails within the moorland, or to ascend to the higher slopes. Within the moorland the informal trails follow the main gravel terraces, up and around the moraines and along the ridges (eskers), giving very attractive views over the surrounding terrain. In winter, with sufficient altitude to hold snow, there are usually good ski touring opportunities across the whole of the moorland area, including the extensive boggy ground, if this is frozen. A new road in this location would diminish the quality of these views and activities, in the near and far distance.

Some deer and stock fences cross the area, primarily associated with crofting operations, along with some remnants of ancient inhabitation, along with a number of existing vehicular tracks that traverse the area, mostly going from high to low ground. These features provide an historical and cultural background to the traditional crofting enterprises and management of the hill ground for the shooting of deer and grouse. The existing tracks accommodate small vehicles with the overall impact considerably less than that associated with the large vehicles and wide roads commonly used in many modern day, industrial scale forestry operations. The existing forestry plantations are all outwith the moorland area which the proposed new road would cross. Those plantations to the west of the proposed development area are relatively

isolated and with much of their woodland content subject to windthrow over many years and with most of the deer fencing now permeable and derelict.

The applicant has stressed the significance of the proposed new road for forestry purposes, especially for the extraction of timber and removal to the public highway. Expert advice, however, indicates that the cost of construction of the new road would likely outweigh the commercial value of the timber extracted. The existing commercial value of the standing timber is unlikely to exceed £300,000 while the cost of the new road construction would be expected to be in the region of £400,000. It therefore appears that the applicant has other, unspecified purposes in mind, for wanting to construct this new road. The obvious conclusion is therefore that the new road is desired for other estate management purposes, notably sport shooting and associated activities, and might indeed be the primary objective for constructing such a road.

While there is no obvious objection to the extraction of timber from these plantations it is unclear why Glen Rd cannot be used for this purpose along its whole length. I first came to reside in Glen Rd in 1980 and my house is very close to the road so I am well aware of traffic constraints on this road. This does not prevent large vehicles, usually associated with agricultural activities, road maintenance or local delivery of supplies, from the use of Glen Rd. Elsewhere it is known that smaller vehicles are used to extract timber from sensitive locations and along narrow roads. I can see no reason why a similar approach cannot be used in regard to Glen Rd, obviating the need to construct a new road across the moor.

I accept some modification might be needed to Glen Rd to accommodate temporary or permanent passing places along with some edge strengthening. Last year I was in Glen Tilt on Atholl estate when it was being used as the film set for a major global production. This involved the transportation of huge amounts of material by large vehicles, from marquees and other structures, boarding and fencing to food stuffs and all the other paraphernalia that accompanies such an operation. The main film base was a long way up a narrow road, comparable in width, bends and slope to Glen Rd. To meet this requirement in Glen Tilt various passing places had been constructed, with relatively little impact on the landscape. If such an arrangement can be made

in the Perth and Kinross section of the National Park, it should certainly be possible to facilitate timber extraction in the Highland Council part of the Park with Glen Rd used as the obvious extraction route from Glen Banchor.

The applicant does not appear to have considered the use of Glen Rd, along its full length, with timber extraction vehicles appropriate to small roads in the Highlands. The use of wagon plus drag combination vehicles (ie a short lorry with small trailer), along with reduced tyre pressures, controlled from the cab, is standard practice elsewhere in sensitive locations. This extraction method, plus minor adjustments to the road periphery, needs to be explored further if significant timber extraction is to be undertaken in Glen Banchor.

Glen Banchor and Pitmain estates were recently amalgamated under a single ownership. I do not recall any of the previous owners ever suggesting that a new road across the moor would be required to extract timber from any of the long standing plantations on these estates. It seems to have been accepted that any timber extraction would be down the existing tarmac roads which access these estates from Kingussie and Newtonmore. But single ownership means that the employees of both estates now work within the same management unit. It might be convenient for these employees to be able to drive across the moor from one estate to another, but this is not a necessity, given the existing public road connection between the two villages. Employees have lived in both Newtonmore and Kingussie for many years and appear to have had no difficulty in carrying out their management activities in the moor and mountain areas by using the existing public road network plus existing hill track network.

I accept, however, from the perspective of guests participating in shooting activities on the single ownership of Pitmain/Glen Banchor estates, it might well be convenient if they could drive themselves, or be transported along, a new road across the moor which connected the two estates. Such convenience for estate guests is not a sufficiently good reason to override the landscape policies of the National Park and certainly does not represent, in any way, a national interest that should take precedence over CNPA policies.

Finally, I wish to comment on future forestry policy. The applicant is very vague in stating any intentions regarding forestry that might be linked to this

new road application. It is, however, very unlikely that future forestry developments are likely to lead to the type of timber extraction difficulties that are of current concern.

Indeed there is possibly a need to question whether any timber extraction should take place from the existing plantations. These existing stands of mature woodland provide important areas of shelter and browse, especially in winter, for the large herds of red deer which roam this part of the Monadhliaths. These refuges have become increasingly significant in recent years as more and more of the lower land has been deer fenced to prevent deer entering croft land, houses and gardens and new forestry plantations. Much of the woodland in the existing plantations is wind blown and it may be worthwhile to leave the remainder to over mature and develop a natural pattern of death and decay, dependent on climatic and soil conditions. Such an outcome could be beneficial to the overall relationship between deer and trees in this area, especially if the old plantations are carefully integrated with new woodland establishment through planting or natural regeneration.

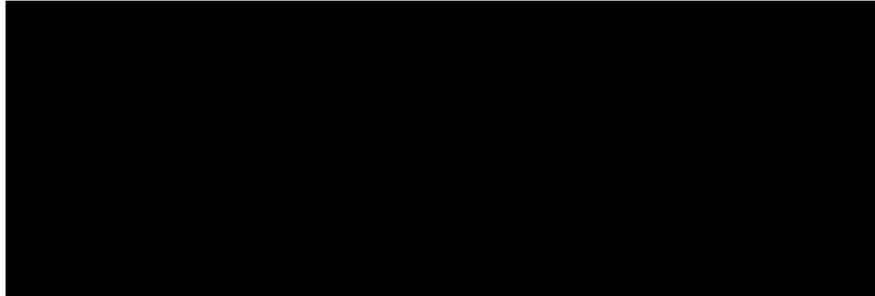
Recent forestry planting along the River Calder in Glen Banchor has not required any change to the existing road/track network and, as this is promoted as a conservation project to restore riverine habitats, it is not expected that this will provide a resource for future timber extraction. Elsewhere on the moor and montane ground on these estates future forestry policy is much more likely to be directed towards ecological restoration for climate change mitigation, biodiversity recovery and to minimise downstream flooding. This means that future woodland established in these parts of these estates is expected to produce permanent tree or shrub cover, with timber extraction a minor element. Planting to meet timber production objectives, both locally and nationally, is likely to be focussed on land elsewhere where growing conditions and extraction techniques are more straightforward. There is therefore no long term need, from a forestry perspective, for the construction of this new road across the moor.



Emma Greenlees

From: [REDACTED]
Sent: 09 January 2023 23:48
To: Planning; Edward Swales
Subject: Comments 2022/0421/DET

Categories: Emma G, Comments



CNPA
Granttown on Spey

planning@cairngorms.co.uk
EdwardSwales@cairngorms.co.uk

9th January 2023

Dear Ed Swales
2022/0421/DET Construction of 4.83km forestry track, formation of passing places, renewal of bridge at Land 760M NW of Riseley Cottage, Glen Road, Newtonmore.

BSCG objects to the above application and we would like to request the opportunity to address the committee when the application is determined.

Compliance with CNPA LDP policy

The proposal would have major detrimental impacts on the landscape character and special landscape qualities of the area. The track would be wide, large and intrusive, with large passing places and turning areas.

The proposal fails to comply with Policy 5.1 on Landscape. The proposed track would reduce the sense of wildness that is experienced in this area of very scenic, varied and open hill ground, with inspiring views to the hills.

The track would not deliver social or economic benefits of national importance; and the negative impacts of the development have not been significantly minimised or mitigated, and we cannot see any way that this could be achieved.

The proposal also fails to comply with Policy 5.2 on Private Roads & Ways. The presumption against new private roads and ways in open moorland should be applied to this proposal. We do not consider that the proposed track is essential for land management. We consider that the forestry operations referred to can be conducted, using different methods, without constructing the proposed new track.

Further, we do not consider the development has been designed to minimise landscape and environmental impacts; and the proposals would undermine the landscape character and special landscape qualities of the National Park, including wildness, that characterise this area.

Impacts on Peat

The route of the proposed track crosses through fairly lengthy stretches of wet heath (shown as M15 on the supporting NVC maps). This is a habitat that is characterised by peat or peaty mineral soil that is commonly from around 15cms deep and usually less than 2m deep. The track also crosses through short stretches of mire (shown as M18 on NVC map), that is characterised by deep peat of typically more than 2m depth and sometimes up to 10m deep or more.

The disruption of these areas of peat due to construction of the track would inevitably release carbon; it may also cause drying of surrounding peat, having further longer term negative impacts. Such consequences would exacerbate climate change and undermine the positive carbon sequestration that is hopefully to be delivered through peat restoration projects.

Impacts on Biodiversity

Due to disturbance caused by track construction and through use of the new track, the proposed tracks may impact on breeding waders, such as curlew (on the UK red list of birds of conservation concern, and Near Threatened in Europe and Near Threatened globally); lapwing (UK red list and Vulnerable in Europe and Near Threatened globally); redshank (UK amber list and Vulnerable in Europe); snipe (UK amber list and Vulnerable in Europe); oystercatcher (UK amber list, Vulnerable in Europe and Near Threatened globally).

We are concerned that there has been no assessment of fungi, a species rich group that is generally poorly known in the Cairngorms and that plays vital ecological roles.

We are further concerned that there has been no assessment of invertebrates, which are another diverse group that plays vital ecological roles, including pollination.

Impacts on access and amenity

The area that the track passes through is popular for walking, running, cycling, dog walking, etc and has the advantage of being easily accessed from Newtonmore.

The small scale of the public road in Glen Banchor and the stunning landscape setting that it enjoys, makes this public road a very special and unique route. The proposals would have a detrimental impact on this road, through the introduction of large passing places and the several new tracks that join the road or are close to it.

The large and intrusive tracks that are proposed would significantly reduce the quality of experience for the public using the Glen Banchor area, in terms of landscape and setting, as well as damage to the ground during track construction, and noise and intrusion of machinery also during track construction.

For people using the existing track that runs approximately north east from the Glenbanchor road, the intrusive and unattractive new track would be running approximately parallel and close by. There would also be an unattractive large track and turning point near this existing track.

The quality of experience for people using the track to the west, the Glen Road, would be impacted through widening, including for passing places and turning areas, as well as during construction through noise, disturbance and use of the existing track by construction machinery. This area to the west, that is beyond the public tarmac road provides an inspiring setting that should be kept as free of human artefacts as possible.

Alternative options

We strongly recommend that the present application should be rejected.

For the forestry operations, smaller vehicles could be used, which are able to use existing roads and tracks; and working methods could be put in place that obviate the need for large and intrusive passing places.

Yours sincerely

