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Your refc SIT/SAC/8217/MAN

Dear Keith,

***Proposed Alterations to VMP for Cairn Gorm***

Thankyou for your letter of 16 May consulting on the above proposed changes. The management committee of the Cairngorms Campaign considered these proposals at its meeting on 6 June and came to conclusions. Clearly, CML's stated current aims to provide a combined mountain and educational experience for a wide visiting public are not ones the Campaign would disagree with. Any fundamental dispute has been about location of the enterprise, not the current stated intents.

We would make three general points apart from specific responses to the individual proposals.

- 1) There is a temptation to address this as a "thin edge of the wedge" initiative leading later to other propose relaxations of the conditions within the VMP. Undoubtedly, financial and other pressures on the company can provide a strong incentive for a gradual erosion of constraints on their operations under the VMP any such tendency has to be guarded against. However, we feel it is probably best to avoid such arguments, based as they would be on unprovable motives as to CML's intentions. We therefore base any arguments on clearly logical objections or grounds for support. The first thin edge was the proposal to allow walkers into the Ptarmigan building as long as they went out again. We believed that first proposal would not have affected visitor impacts and was not opposed. It is the difference between firmness and rigidity.
- 2) Very large amounts of public money have already gone into supporting downhill skiing and other recreational activities on Cairn Gorm, and considerable amounts continue to be "invested" there on path maintenance, ranger services, and other expenses. While some of this may be reasonable investment of public money, we feel there should be a general presumption against developments that tend to increase that load, especially when they stem from the difficulties of ecological restoration from human impacts on highly vulnerable environments. Such work is often particularly costly and ongoing.
- 3) The over-riding principal in these matters must be to maintain demand within the limits of what the environment can sustain and, if demand exceeds that, it

is the demand that must be managed, not the environment that must be excessively manipulated or have too much of a burden placed on it. CML make clear in their literature that respecting the strong constraints of the environment is a general principal they support.

- 4) Some aspects of the proposed VMP changes CML in the document accompanying your letter for the proposed changes do not seem well founded, relying on assertions about likely changes in hillwalkers' behaviour or not taking proper account of impacts of changes. We feel that, in this situation, rationale supporting changes to the VMP as not environmentally harmful on balance must be supported by good evidence and deduction. Also, that the "onus of proof" lies firmly with CML to provide this. It does not lie with other parties to prove changes to the VMP are not harmful.

We feel that the above points form the framework of a general policy in assessing changes to the VMP and perhaps developments in general on Cairn Gorm and would be interested in SNH's view on this.

Given these points, our response to the individual proposals are as below:-

#### ***Proposal for the "Windy Ridge" Path Addition***

This case is not well made and does not take potential impacts into account. The path in question basically is in two sections – the initial steep ascent from the Coire Cas car park, and the upper, less steep section after it joins the old line of ascent that came up from the lower glen and continued along the ridge.

The repairs done on the section from the car park up to join the old path would not withstand a greatly increased number of walkers, unless further maintenance and repairs became annual. As it is, the taxpayer through HIE has paid for repairs, not the Company and the path's maintenance would probably also have to be financed by the taxpayer. Indeed there is an argument for CML itself to be expected to finance such repairs and maintenance.

The upper section is on ground that is highly vulnerable to damage by treading, due to a combination of higher altitude, poor soils, and exposure. This section of the path had widened to almost 3 metres in its upper stretches (we need to check that figure) when in regular use as a main route up Cairn Gorm until the ski road was built. It was later blocked by snow fences across the line of it and hardly used at all. Even by the early 1980s however, the pathline, which had almost "healed over" naturally at the level of the link road, showed little sign of recovery at these altitudes. We have photographic evidence of this. Increased traffic should never be encouraged on this section.

CML states in its supporting argument that "there is intense demand for good walking routes through the ski area to Cairn Gorm." That may or may not be the case, but it is not in itself an argument to make the change unless it is clear there would be no unacceptable damage, and no further large burdens placed on the taxpayer. As stated above, demand must be managed within the limits of the environment. If private individuals like Cameron McNeish wish to recommend the route in guidebooks, that is up to them, but it does not provide grounds for CML to do same under their Section 50 agreement.

There may be, as CML state, an “intense demand for good walking routes through the ski area to Cairn Gorm”, but that is the very reason the restrictions in the VMP are there – not a reason for eroding them!

**We therefore feel that there are strong reasons for not permitting this amendment to the VMP.**

***Option for Walkers to Purchase One-Way Tickets from the Ptarmigan Down.***

The supporting arguments offered by CML do not seem to us valid. Viz:-

- 1) *It will reduce numbers of people entering the Natura site by deflecting them from the Northern Corries path and have the impact of reducing numbers entering the site by this route.*

Moving impacts from one place to another does not solve anything and is not an argument for doing it, especially if you are removing them from a vulnerable to more vulnerable area as in this case. The Northern Corries paths have already had much money spent on them to render them robust and resistant to foot traffic and these corries are a more suitable environment for many of the visitors to the area anyway.

- 2) *It would offer an important opportunity to educate walking visitors about the Natura site*

This is a slippery argument. Educating people is fine, but it does not, in some mysterious way, alter the damage done by their feet. Advancing it as an argument in support of a measure that would increase that traffic (See 4 below) and hence the consequent damage is not logical. Would the “educational message” for example include guidance not to use the “windy ridge” route for the reasons stated above?

- 3) *Reducing Damage by Walkers Returning via the Main Track*

The proposal for walkers to go down on the train would probably reduce visitor impacts in Coire Cas and Sron an Aonaich. This seems the only argument advanced that has some merit. But does any advantage outweigh the overall disadvantage? We think not. Coire Cas already has a route down that has to be maintained under the impact of a diversity of traffic. It may be, as CML states, that there is a common complaint by hillwalkers entering the Ptarmigan that they cannot purchase a one-way ticket down. As a hillwalker myself I can only say that people who want easy ways down should stick to escalators, not take up hillwalking!

- 4) *Walkers’ Behaviour*

The great increase in walkers using the vulnerable plateau area subsequent to the opening of the chairlift and the consequent spread of damage to that area partly because of this have been well documented, particularly by Dr Adam Watson. This work and arguments derived from it were a major part of the then NCC’s case for opposing downhill ski development in the Northern Corries and Lurchers Gully at the 1981 public inquiry. The rationale for refusing exit from the top station was always clear and based on such evidence – to reduce numbers of people reaching the plateau and other highly vulnerable areas. This was to be achieved through restoring the “long walk in” as far as the situation on Cairn Gorm will permit. **The test therefore of whether this change in the VMP is acceptable is, “Does it shorten that “long walk in” and/or associated time and physical effort, and hence tend to increase foot traffic on higher vulnerable areas?”**

Permitting walkers to enter the top station and use the funicular to go down, reduces both time and effort as it removes the walk down Coire Cas. This kind of calculation regarding time and effort required for a journey is basic in influencing decisions on route and destiny by hillwalkers. **On these grounds alone therefore, we feel that this proposed amendment should not be permitted.**

We would point out that there is a clear interaction between the two proposals. The walk up Coire Cas is not particularly attractive from the walker's point of view. However, there is no doubt that the ascent from the car park at Coire Cas up the initial constructed section is steep but relatively easy given the construction. Once the ridge has been gained it is an easy gradual ascent to the top station with fine views, followed by an easy ascent up the causeway built from there to the summit of Cairn Gorm. If the descent can then be by the way of the Funicular, the whole route then becomes an easy and attractive way to and from higher vulnerable ground. It would doubtless attract many additional walkers. The result of this interaction therefore would be to increase the number of walkers and their associated impacts on the highly vulnerable "Windy Ridge" section.

I would be happy to discuss any of these points further with you.

Yours sincerely,

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CC:-  
C Maund, CML (by email)  
David Jardine, Forestry Commission

## EXAMINATION OF PATH FROM COIRE CAS CAR PARK TO THE TOP STATION

DRENNAN WATSON

27 May 2006

I walked the whole route from the Car Park to the Cairn Gorm summit and then down through Coire Cas on 27 May to see the state of the paths mentioned in the proposed changes to the VMP. I would make the following comments.

- 1) The initial constructed section from the car park up towards the ridge Sron an Aonaich goes up to roughly about 730m, though it is difficult to be exact about the final altitude. It is basically a series of constructed, irregular stone steps. In its upper sections at least it is showing signs of breaking up, with tracks starting to develop on peaty or gravelly "soils" either side of the constructed route. Some of the stone "steps" coming out of place. At its topmost sections, the deterioration is more extensive, with damage to peaty soils nearby and gravelly, eroded outwash damaging downhill vegetation.
- 2) The constructed section ceases well before the ridge is reached and the path immediately starts to broaden. It forks into right and left hand sections, each reaching towards the ridge. The left hand section is roughly one metre wide, but the right hand section is nearer 2 m wide in many parts. Increased traffic on this section would certainly mean foot related erosion and other damage would increase.
- 3) On the ridge, the vegetation and soils are increasingly vulnerable and the wind exposure greater. The path widens to about 5m, sometimes splitting into winding strands over wider areas of ground. The extent of the vegetation damage is clear when the trampled areas are compared with areas of ground between the nearby snowfences where only skiing associated impacts exist.
- 4) Over 30 "compulsive" cairns of various sizes have been built by walkers along the line of the route on the ridge. This has contributed to some extent to the damage.
- 5) In the highest section of the ridge route, erosion gullies of about 6cm depth have appeared in the path.
- 6) In the final 100-150m of walk, the route has been constructed by putting down a layer of large, rough-cut, blocks of stone on top of the vegetation, and covering them with a layer of fine gravel and coarse sand "blinding" to make a surface. A route wide enough to take a vehicle has been made. Water erosion is now washing the gravel and sand down between the blocks and slowly revealing the blocks. If this continues, resurfacing will be necessary.

Conclusions:-

- 1) The lower constructed section would not stand greatly increased traffic – particularly not in its upper sections. Considerable work would need to be done if it was to take heavier traffic and indeed it needs attention now.
- 2) The section from the end of the constructed part to the ridge would suffer badly under increased foot traffic. It is simply bare gravel and/or peat revealed by the impact of treading, is on a fairly steep slope and would erode readily.
- 3) The section along the ridge is clearly showing heavy damage and is simply not terrain that can withstand much foot traffic. Even after the development of the alternative route to the summit via Coire Cas displaced this line as the main route to the summit of Cairn Gorm from lower Glenmore, this section showed very slow rates of recovery compared with the same route at the level of the link road. It would have to receive similar treatment to the route from

the top station to the Cairn Gorm summit – very expensive and hardly to be recommended.