From:Stephen Corcoran

**Sent:**Mon, 26 Nov 2018 16:58:31 +0000

To:Edward Swales; Planning

**Cc:**Frances Thin

**Subject:**RE: 2018/0400/DET Balavil Hill Track

Response from Peatland Action Project Officer

2018/0400/DET Balavil Hill Track

Substantial portions of this proposed upgrade of an existing ATV track pass through areas of deep peat and blanket bog vegetation. The upgrading of the ATV track to a hill track with a mineral surface will have significant localised negative impacts on the blanket bog habitat.

I support the comments provided by the CNPA Landscape Advisor and Ecologist on the need for better design statements for the track construction particularly over the areas of deep peat.

It is not clear where material will be sourced for laying a suitable substrate across the large areas of blanket bog. Three borrow pit locations are identified – these are some way from the southern end of the track.

Borrow pits should not be created in any blanket bog habitat as this will damage the peat structure and underlying hydrology. Borrow pit locations D, G and I on the habitat survey provided are in areas of blanket bog habitat. The actual borrow pit locations should be in shallow mineral soil locations.

The design statement needs to clarify what will be done with the excess excavated peat. This material is not suitable for re-use in degraded blanket bog features.

Further construction details are required regarding the drainage features being constructed in the blanket bog areas and culvert construction. Unless properly constructed these are likely to erode and wash peat sediment away.

The design statement highlights the need to re-use turfs as soon as possible and not leave them for more than 72 hours. In excessive dry periods like the spring/summer experienced this year such turfs are likely to dry out very quickly. The design statement needs to include a watering protocol in the event of very dry weather during construction.

All drains need to be fully turfed and not contain any areas of bare peat as this will help prevent erosion and encourage recovery of blanket bog vegetation.

The exact route of the track must avoid blanket bog and deep peat areas as much as possible and be constructed across the areas of dry heath and acid grassland identified in the habitat survey. These areas are drier and the mineral layer is nearer the surface. This may require some minor re-alignment from the existing ATV route.

There are several areas where the track crosses peat gullies with significant areas of bare peat (i.e. NH75160933). It is recommended that these erosion gullies are restored as compensation for the loss of blanket bog. This will involve the installation of stone dams, re-turfing, wooden dams, spreading of sphagnum-rich mulch etc. The PA Project Officer is able to provide advice on appropriate restoration techniques.

The proposed rout where the track drops down to the River Dulnain crosses an area of deep peat with erosion channels. It is proposed to modify the existing ATV track and create a number of zig-zags in the new track down this slope to the River Dulnain. This will have a significant, detrimental impact on the blanket bog in that area. It is recommended that the track is extended 400metres to the north across the dry heath area and then a new route zig-zags down the hill through an area of shallow peat and dry heath habitat thereby avoiding the deep peat area.

As part of the compensation for the loss of blanket bog habitat, all the existing ATV track that damages blanket bog and will not be incorporated into the new track should be restored. This will include using methods such as re-turfing, bunding, spreading of sphagnum-rich mulch, dam etc. The PA Project Officer can provide advice on the techniques to use.

A restoration plan is detailing the areas of blanket bog to be restored, techniques to be used and timetable for completion.

A monitoring plan detailing monitoring of the restoration areas and reporting requirements to the CNPA is required, with follow action highlighted if need be.

Any questions please let me know.

Cheers,

Stephen Corcoran

Peatland Action Project Officer

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