



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

Beryl Leatherland
Convenor

Perth and Kinross Council
Planning and Development
Pullar House
Kinnoull Street
Perth PH1 5GD

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Dear Sir/Madam

Application 17/02156/FLL, Extension to track west of Invervar Lodge, Glen Lyon

I am writing on behalf of the members of the Scottish Wild Land Group [SWLG] to **object** to the above application. We have several concerns and most of these relate to omissions that we consider should be in the application. These are as follows:

1. The application states that a full planning application is needed as it would run through a National Scenic Area [NSA], this is so but it should also be mentioned that a full application is required as the track is needed for "deer management" purposes and stalking related tracks require full planning applications.
2. The site is also in Wild Land Area 10, although this is not mentioned in the documentation on your online portal. As this is the case, a Wild Land Assessment should be submitted for consideration. The upper part of the proposed track would be in an open location and noticeable visual impact would be caused.
3. We note that the Phase 1 Habitat Survey Report of September 2017, commissioned by Galbraiths, points out the limitations of the methodology and sampling techniques and the sampling frequency that have been used. They indicate that in order to produce a more comprehensive and fuller assessment that would address seasonal and other variations more frequent sampling over a period of time would be required. Thus the estimates regarding protected mammal species are only indicative of a specific point in time [which may have only been on only one day of observation work]. We would point out that a reliable level of accuracy can only be achieved by sampling regularly over a period of time, such as a year, or preferably more. In addition, walk over surveys are not sufficient in themselves to report definitively on the absence of species.
4. There is a significant omission from the Habitat Survey Report in that there is no mention of any consideration of the existence of Pearl Mussel habitat in the Invervar Burn or its tributaries. Many burns in the area are notable Pearl Mussel habitat; in fact the Council Officers will recall that a few years ago a developer was fined for allowing his contractors to



silt up a Pearl Mussel habitat during the construction of a hydro plant in Glen Lyon. Assurances [or otherwise and with effective mitigation strategies specified] should be included.

5. The Planning and Design Statement does not specify environmental considerations such as restoration of construction damage and plant enclosures and so on after the work is completed.
6. The Design Statement makes much of the fact that there will be increased recreational opportunity by provision of a circular route. However, this is not really a circular route in that the walker would ascend and descend the same burn route, there would in reality be no significant increased opportunity than already exists; we consider that this point is spurious and perhaps represents an attempt to persuade and to further justify the track.
7. The track would cross several burns along its length and yet there is no mention of how these crossings would be achieved. Bridges should be constructed to avoid river bank damage and silting of the burns and the main burn. There is no mention of silting avoidance techniques and proposals in the Design Statement at all. In view of the substrates in the area this work would be essential in our view.
8. The application form states that there will be no arrangements for waste disposal. Every development however small creates waste. In this proposal there is the intention to import aggregate which will generate wastes; the fact that there are workmen on site will also do so from various sources, and in addition there needs to be some consideration of construction plant maintenance and the possibility of oil etc spillages and how these might be handled, especially in this rural location. A Waste Management and Pollution Prevention Plan is required.

Our **main objection** concerns the purpose of the track. We consider that if this track is allowed for ATV use then such use will inevitably then extend further beyond the track length as proposed and then some time down the line there will be another application and so on. Such disregard for the integrity of a NSA is unacceptable to us. We are increasingly seeing applications for tracks in order to ameliorate and rectify ATV damage and we feel that this is just another method of getting new tracks granted for reasons that are not justifiable. A good track already exists in the glen and an additional track is not warranted.

We urge the Perth and Kinross Council to reject this application.

Should you wish any clarification on any of the above points, please contact me.

Yours faithfully

Beryl Leatherland