



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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## Consultation on the Loch Lomond & Trossachs National Park Deposit Local Plan

### Mountaineering Council of Scotland Response

MCoFS welcomes the opportunity to comment on the LLTNP- Deposit Local Plan. The MCoFS interest in this Plan lies in our commitment *“To represent mountaineering in Scotland, by protecting, informing and developing the interests of hill walkers, climbers and ski-tourers.”* Our interest lies, therefore, in access and conservation to hills and crags. We recognise LLTNP as a premier location for both upland conservation and recreation in Scotland, and find a lot in the Local Plan to commend.

### 3 DEVELOPMENT STRATEGY

#### 3.3 DEVELOPMENT STRATEGY

##### Green Practices

The MCoFS support the statement, “landscape sensitivities and unsuitable topography are constraints to large-scale wind or hydro schemes.” We support household-level renewable developments, rather than pressure for larger scale projects that have a greater impact on the special landscape qualities of the Park. Hydro schemes are also welcomed in principle, as being capable of minimal landscape impact, however we would sound a note of warning in respect to associated infrastructure such as tracks that have a negative impact on the landscape disproportionate to the land take.

##### Safeguarding the Environment

The MCoFS is concerned that this section does not make an explicit statement about protection outside protected sites. This is vital to encourage adaptation of species by migratory routes along habitat corridors and across habitat stepping stones. Additionally, landscape quality is not restricted to protected sites and is the context for such designated sites being visible from them, and having qualities in their own right, such as wildness character. Article 10 of the Habitats Directive directs member states to ensure that areas beyond protected sites must be fully considered. This section may be the appropriate location to support such a Directive Article.

##### Recreation

The MCoFS supports the recognition of different needs in, “support is given to recreational infrastructure recognising that different areas are capable of accommodating different types and

levels of recreational activity.” Infrastructure such as made paths, as opposed to repair of erosion, is not appropriate in areas away from communities.

### **3.4 LOCATIONAL STRATEGY**

#### **The Countryside**

The MCofS supports “small-scale renewable energy,” however small-scale developments can still have significant negative impact depending on where it is located; impact is not proportional to size.

#### **Policy ED3**

The MCofS welcomes the statement of support for development being dependent upon consideration of, “b) their physical, visual or other environmental impacts, or cumulative impacts in association with existing developments, [and which] would not lead to detrimental impacts on identified special qualities.” Developments must also take account of cumulative impact with other developments progressing through the planning process in parallel.

### **3.7 SUSTAINABLE TOURISM AND RECREATION**

#### **Recreation**

The MCofS welcomes the recognition that, “the challenge for the Park Authority is to find a balance between encouraging and promoting recreation, whilst striving to conserve and enhance the special qualities.” This is reflected in the MCofS draft Access & Conservation Position Statement which includes, “The MCofS does not consider it appropriate to construct paths, as opposed to repair linear erosion, in order to facilitate access into relatively untouched areas.”

## **4. ENABLING AND MANAGEMENT POLICIES**

### **4.1 ENVIRONMENT**

The MCofS supports the commitment to further landscape assessment being, “required before being able to confidently move away from present landscape designations to rely on a system of National Park landscape designations.” The existing landscape designations ignore the huge importance of wildness character as a valuable asset. This must also be integrated into Policy L1 through a commitment to wildness character.

#### **Natural Environment**

The MCofS particularly welcomes, “ensuring biodiversity is protected and enhanced across the entire Park area.”

Please do not hesitate to contact me to discuss these issues further.

Regards

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Access & Conservation Officer