



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

NPF2

Mountaineering Council of Scotland (MCofS) Response

Introduction to MCofS

The MCofS is the Scottish Government recognised representative body for hill walkers, climbers and ski-tourers, which Visit Scotland statistics estimate as numbering 400,000 participants. We have 10,000 members, with 127 Scottish hill walking and climbing clubs affiliated. Our quarterly magazine *The Scottish Mountaineer* has a circulation of 15,000, and our website attracts huge interest in both Scotland and abroad. We are financed by membership subscriptions and we receive investment from SportScotland, Scottish Natural Heritage, Scottish Mountaineering Trust and British Mountaineering Council.

Comments on NPF2

MCofS supports a Scotland that is wealthier and fairer, greener, safer and stronger, smarter and healthier.

In some important areas the draft document is unclear about what a designation of National Development will mean in practice. Recognition of national need suggests a presumption in favour of the development. The fact that the designation decision is being done in advance of detailed consideration of the impacts will mean pressure to push the development through the planning process, so will not permit an objective judgement based on the acceptability of the environmental impacts. If the designation identifies the “need” for the development and that it is “essential.” It is unclear if this will mean there will be a higher threshold of acceptability of negative impact, in which case it is difficult to see how this will agree with statements about protecting or enhancing the environment. Without safeguards, this could work against the Government strategic objective of “Greener - Improve Scotland's natural and built environment and the sustainable use and enjoyment of it.” Planning guidelines need put in place to ensure that National Developments are not treated differently in terms of acceptable environmental impact when proceeding through the planning process.

The local and national park authority approaches to wind farm location guidance has been variable. The MCofS supports “community-based renewable energy projects” (paragraph 182) where the energy is harnessed local to the point of use. This reduces the necessity of transmission, hence avoiding environmental impact beyond the actual wind farm site. This illustrates the need for a Scotland-wide Renewables Strategy that is spatially-specific and overtly recognises the impacts on landscape, biodiversity, wild land, and not just considering these impacts on designated sites. There

is high value in conserving expansive areas for quiet enjoyment of nature among the iconic mountain scenery of Scotland without major man-made intrusion through built structures. Often such areas are not located in designated natural heritage areas, but have wild land qualities that have no designation.

Comments on SEA

The MCofS commends the Scottish Landscape Forum highlighting of cumulative effects (paragraph 186). There has been insufficient consideration of cumulative effects as there are so many developments being proposed that there are parallel applications in close geographical proximity. This is particularly important in wild land areas where there is very little evidence of man-made infrastructure, and those qualities can be lost through even small changes.

As the presentation at the Inverness NPF2 event pointed out, many effects will only become apparent as the NPF is translated into more specific plans and policies. It is vital that consultation is not a one-off opportunity before all the facts are known about impacts. Effects are often more influenced by how a development is realised rather than what the need is, and not all implications are included in the SEA. Public access is not mentioned as a potential impact. The Glen Doe hydro scheme illustrates negative impact on people's enjoyment of the environment. Access for walkers and other non-motorised access has been disrupted for a number of years through lack of recognition and mitigation of this impact.

In terms of mitigation, one obvious omission is promotion of the reduction in energy used. This would result in a reduction of demand for energy, therefore a reduction in demand for some developments such as increased grid capacity and transmission infrastructure. Another mitigation method is to give preference, and support, to micro renewable projects over the reliance on large scale developments. A hierarchy mirroring "reduce reuse recycle" for waste should be used for energy developments.

Although there have been statements that landscape is a high level commitment, it is unclear what this commitment means in light of the fact that the natural heritage designations map does not include the National Scenic Areas. These are the very minimum set of areas of outstanding landscape that need conserved. The MCofS believes that the coverage of this designation should be extended to other areas. The best way to ensure high level commitment to quality management of these areas is the preparation of a Management Strategy for each area. Conservation of these areas is the minimum that is required, but much valued scenery is outwith any designation. This is particularly relevant to wild land which has no designation. It is the wild land qualities that need conserved, rather than any particular arbitrary area as currently there is no designation for this characteristic which greatly contributes to many iconic landscapes in Scotland. Additionally, it needs overtly recognised that designated sites do not function in isolation from the rest of the environment. Developing up to an arbitrary boundary is not logical when dealing with ecosystems and landscape.

As noted in paragraph 20, many of the effects will only become apparent as the strategy is taken forward through strategic and local plans. This means that it is not possible to properly assess the environmental impacts until the details of the developments emerge. This emphasises the need to ensure all planning guidelines are fit for purpose. Wild land needs greater emphasis in SPP14 in order for this to be achieved.

The SEA found that, in relation to climatic effects (issue 3), there would be a positive impact of improved habitat networks to assist migration. However, this does not apply to all habitat types. With the already observed climatic changes and the fact that montane environments are necessarily disjunct due to the limit of high altitude land, it is not possible to improve opportunities for

migration. This highlights the need to have particular emphasis on conserving upland habitats as a diminishing resource, and hence should be given greater weight in a balance between negative impacts and an acceptable threshold because of the difficulty, if not impossibility, of mitigating the impacts. In the uplands, survival of habitats is little dependent on interconnection of habitats as this is often impossible on the edge of the geographical range of a species or habitat, but more dependent on the continued existence of ‘islands’ of habitats. The ecological health of these areas needs to be secured. Species that exist in these harsh environments tend to be specialists adapted to low competition, but highly specific requirements, hence their capacity to adapt and compete is considerably lower than species that are generalists, and live at a lower altitude. An NPF2 that does not prioritise conservation of these areas threatens the health of Scotland upland ecosystems, irrespective of “need” for the developments.

Rural areas (issue 9) will be directly affected by developments such as energy transmission infrastructure. Such a development will increase the pressure on rural areas through increasing the attractiveness of these areas for other developments such as wind farms. This would likely have negative effects on rural areas in terms of environmental quality at the local scale, not “no adverse effects” as stated in the NPF2 draft.

Issue 11 states that “reinforcement of the electricity transmission grid will need careful management to avoid significant cumulative landscape effects.” If the route is over ground, it will have significant negative effects on the landscape, even more so if taken along a route well away from existing infrastructures and into wild land areas. The West Highlands and Islands Local Plan draft preferred areas for wind farms is the same area proposed for potentially re-routing the Beaully-Denny line to avoid Cairngorm National Park. The cumulative effects are potentially significant, and this level of cross-referencing is vital to ensure a meaningful SEA.

Comments on Annex: National Developments - Statement of Need

7. Grid Reinforcement – This need is based on the asserted requirement for a large scale development of the wind energy industry. If it is accepted that grid reinforcement is necessary, the NPF2 is not an appropriate location to state method of achievement such as “overhead” as in a number of elements of the development. There are alternatives to some of the most damaging elements of this development e.g. west coast subsea routing or undergrounding. At this stage it is not acceptable to have the description in detail unless there has been sufficient consideration of the alternatives. An element of the Action Programme should be to detail the alternative methods for the achievement of the transmission upgrade. The Briefing Notes for the Inverness consultation meeting on 21 February state that “however, planning (and other permissions as necessary) will still be required to deal with the details of the developments.” The Description of Development section here provides some detail of the development, not just the need for transmission upgrade. This is inconsistent with the ND designation establishing need, but planning subsequently dealing with the detail, which is inappropriately preceding the appropriate process.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer