



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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13/3/08

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Dear Sir / Madam

West Highland and Islands Local Plan (WHILP)

Mountaineering Council of Scotland (MCoS) Response

The MCoS is the Scottish Government recognised representative body for hill walkers, climbers and ski-tourers and, which Visit Scotland statistics estimate as numbering 400,000. As the only national representative body of the sport of mountaineering in Scotland, 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, the Scottish Mountaineering Trust and the British Mountaineering Council.

General Comments

We welcome the opportunity to comment on the WHILP. The following is an explanation of issues mountaineers consider to be of high significance in this important area for quiet recreation and high quality landscape.

MCoS both recognises and supports the aims of economic and community vibrancy alongside the conservation of the significant natural heritage qualities of Lochaber, Lochalsh and Skye. These three areas are of prime importance for active recreation, and the positioning of Lochaber as Outdoor Capital of the UK reflects this. In order to maintain relevance of this title it is vital that this Local Plan, and application alongside other policies, allows development in the area in such a way as to recognise the significant importance of conserving the natural heritage, and that it is vital to the achievement of other important aims such as economic and community sustainability. This importance should not be underestimated. The report from 2003/4 on the economic benefits of mountaineering to the Highlands and Islands was reported as “a net annual expenditure of £245.7m for 2002/2003 and the equivalent of 4,466 full time jobs. A further 1,737 indirect and induced jobs were supported by walking and mountaineering tourism.” [Economic Impact and Development Opportunities for Outdoor and Environment Related Recreation in the Highlands and Islands - Research Report - Walking and Mountaineering by George Street Research And Jones Economics,

2003/2004]. MCofS wholeheartedly supports the statement in the Foreword, “the area’s important assets - natural, built and cultural – will be safeguarded.”

Section C VISION – 2025

4.18 states that “new investment in evolving technologies which underpin the renewable energy sector, most notably adding value by recycling and harnessing the forces of wind and wave – on shore in the Duror/Appin, Loch Laggan/Loch Ericht and southern Monadhliath uplands; and off-shore via the narrows in Lochs Linnhe, Loch Eil and Leven”. Appendix 1 explains the Council’s intention to recognise the regional importance of “remote landscapes of value for recreation.” These areas have yet to be defined, but much of the area listed as targets for renewable energy development are relatively remote areas of high value for active recreation.

Duror / Appin – Fraochaidh between Glens Duror and Salachan is a popular hill as a Corbett, often accessed from Duror, and within 2km of the overlooking ridge of Beinn a Bheithir which is part of a National Scenic Area.

Lochs Laggan / Ericht – This is a popular visitor location for Monarch of the Glen views, and many very popular Munros (e.g. Creag Pitridh, Geal Charn (one north, another south of Loch Ericht), Beinn a Chlachair, Carn Dearg - Beinn Eibheinn ridge, Ben Alder, Beinn Bheoil, Carn Dearg, Sgor Ghaibre, Chno Dearg, Ben na Lap, Stob Coire Sgriodain, A’Mharconaich, Beinn Udlamain, Sgairneach Mhor), Corbetts (e.g. Beinn Mholach, Stob an Aonaich Moire, The Fara, Meall na Meoig, Leum Uilleim, Glas Bheinn, Beinn a’ Chuallaich) and other popular hills Binnien Shios, Binnien Shuas. To the north of Loch Laggan is an NNR/SPA/SAC/SSSI, and the area around Ben Alder above Loch Ericht is similarly highly important.

Southern Monadhliath – This is an important area of blanket bog. There are a number of very popular Munros (Geal Charn, Carn Dearg, Carn Sgulain, A’Chailleach), Corbetts (e.g. Meall na h-Aisre, Gairbein, Carn na Fhreicheadain) and other significant hills (e.g. Creag Dubh, Creag Mhor, Corrieyairack Hill). There are also significant areas of SSSI/SAC in this area.

5.14 MCofS welcomes the vision of increased use of micro-renewables in the area of Skye & Lochalsh. However, we would like to see micro-renewables as a primary harnessing mechanism of wind power. Micro-renewables are more appropriate in such sensitive landscapes where the quality of the landscape is one of the mainstays of the economic and community sustainability of the area through branding such as “The Road to the Isles” past Loch Eil. Hence, the vision for micro-renewables rather than large wind farms should be pursued throughout the more sensitive landscapes of the West Highlands and Islands. This is particularly applicable in areas that are valued for their relatively unspoilt quality and wild land qualities. Often these areas are outwith designated sites, and a lack of formal designation should not be treated as a judgement that the area lacks landscape that benefits local communities and economies.

5.17 states a desire to strengthen links to the Highland Renewable Energy Strategy. This Local Plan would benefit the area by making clear that a lack of a formal designation necessarily gives a green light to a development.

5.20 states that the area north of Portree is identified as a focus location for renewables. Serious consideration needs given to the implications for tourism of the building of structures in the vicinity of a popular relatively wild destination such as The Storr, and this also applies to close views from the Trotternish ridge.

5.2 states that sensitively sited community energy schemes are preferable. MCofS supports this assessment as these types of scheme, with the proviso that however small the development it is sited

sensitively, is likely to gain community benefit without negative impacts on visitor numbers and therefore the economy.

Section 6 GENERAL POLICIES

The statement that the aim of this plan is to “direct the right sorts of development to the right places,” sums up MCofSs approach, and hence is supported.

Policy 4 No comment can be made on that used to judge the “remote landscapes of value for recreation,” as Appendix 1 notes that this has not be finalized. As discussed above the maps, and the statements in the Plan, do not reflect these recreationally valuable remote landscapes. It is vital to provide a map of these areas that have been identified by the Council as locally or regionally important. It is impossible to comment on their validity or inclusion without knowledge of where they have been deemed to exist. This should either be e-mailed or sent to the address above. As this has not, and cannot be done for consultees on the Plan prior to the deadline for comments / objections, then the submitted comments / objections to this Plan cannot be deemed based on a complete consultation on the document. MCofS would like to offer its expertise as the representative body for mountaineers (hill walkers, climbers and ski-tourers) in further discussions on this matter referred to on page 79 in Appendix 1.

Additionally, the shading on the maps of nationally important areas does not reflect the complete area of the National Scenic Areas. The offshore areas of a number of NSAs have not been shaded on the maps as nationally important, which they are: Morar, Moidart Ardnamurchan NSA, Small Isles NSA, Trotternish NSA, Cuillin NSA (Loch Skavaig / Soay Sound), Kintail NSA (Loch Duich) and Knoydart NSA (Lochs Hourn and Nevis / Sound of Sleat). This is particularly important as some developments relevant to the Local Plan will be affect marine and water bodies. These offshore nationally important landscape areas need fully integrated into the Plan. MCofS urges early formulation for Management Strategies for each of the NSAs in the area as the most effective way to ensure their conservation. SNH states on their website that, “they are those areas of land considered of national significance on the basis of their outstanding scenic interest which must be conserved as part of the country’s natural heritage.

MCofS requests information on the mechanism for advice, on potential implications with respect to non-national and international natural heritage importance locations, for when / if SNH will not provide advice outside its statutory duties to designated sites.

Please do not hesitate to contact me if you wish to discuss any issues raised through these comments.

Yours sincerely

Hebe Carus
Access & Conservation Officer