



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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14/6/11

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Dear Sir / Madam

Argyll and Bute Council Main Issues Report (MIR) – MCoFS response

Please accept these comments from the Mountaineering Council of Scotland (MCoFS) on the Main Issues Report. We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski mountaineers. We have 11,000 members and aim to represent the interests of all the approximate 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment. This includes hills, mountains, sea cliffs, upland and lowland crags. Mountaineers contribute approximately £150 million to the Scottish economy each year, and this makes a significant contribution to rural economies. I have restricted comments to issues that are a priority for those we represent.

Issue 3D - Do you agree with the key objectives that have been identified to achieve the vision?

The objective related to "customers" is unclear without an explicit explanation of who the "customers" are. Without explanation this may be construed as those living in the Council area or contributing the economy of the area. Some features of the natural heritage, including the landscape, are of national significance as recognised through nature designations or reference in National Planning Framework 2 (NPF2) and Scottish Planning Policy (SPP) reflecting that they are a resource for the nation. Such non-designated characteristics include the wildness of some areas (NPF2 section 99 and SPP section 128) and as such the "customers" would be the whole nation on behalf of which the people of Argyll and Bute and through the Council are stewards. This applies whether or not they visit as future generations are also stakeholders.

Issue 4B - Do you think that the LDP should contain a specific policy protecting wild land in Argyll and Bute?

Protecting wildness is a requirement of both the SPP and NPF2, and MCoFS wholly supports this. To ensure this is delivered, a specific policy within the LDP is needed. Map 4.2 appears to be a localised copy of SNH Search Areas for Wild Land (SAWL). The SNH map was produced 10 years ago and was not intended to be used as a pseudo-designation, is not being based on a rigorous study of the characteristics of the land and was essentially just an indication of where wildness was likely to be best expressed. It was neither designed as comprehensive nor exhaustive map of where wildness is to be found. "Wild land character" is what is referred to in SPP and NPF2. This is subtly, but importantly, different from "wild land" as used in the MIR. It is the characteristic of wildness that is to be protected. NPF2 further explicitly highlights the threat of incremental impacts on this characteristic. Simply assuming only addressing wildness concerns within SAWL areas is therefore insufficient to fulfil national policy. Wildness is a characteristic that is expressed outside these areas and it is this feature that policy highlights as needing protected rather than just in the SAWL. The LDP should therefore include a specific policy protecting the feature of wildness,

including where it is found beyond the boundaries of SAWL. The current best technique for mapping wildness is far more rigorous and reliable than SAWL. It has been used in Cairngorms National Park, is being used for mapping in Loch Lomond and Trossachs National Park (LLTNP) and soon is likely to be used in Highland Council area. This is a data-driven mapping technique that is a far better indicator of wildness than SAWL which was never intended as a localised mapping tool. The new tool has the added benefit of being able to assess the features of wildness that would be impacted by any proposed development, and even model the impact of a development.

Issue 6C - In addition to a landscape capacity study, which will assess cumulative and sequential impact, are there any other key aspects that the renewables review should focus on that are not addressed in the current policy?

The “sensitivities of our landscape” must explicitly include non-designated characteristics as well as designated sites as referred to under response to Issue 4B. NPF2 identifies the vulnerability to smaller incremental changes and even wind farm developments of less than 20MW can contribute to this cumulative impact, hence developments under this threshold need taken into consideration when identifying broad areas of search for wind energy developments.

Issue 6J - Do you agree with placing economic and social regeneration as the prime consideration in the decision making process in the Economic Priority Areas identified in Map 6.6?

Some of the areas identified have significant wildness character, and as such taking this into consideration in these areas is equally important as economic and social regeneration in order to protect these resources for the present and future as economic activities now should not sacrifice the finite resources for tomorrow.

Issue 7F - Do you agree with the measures suggested here in mitigating and adapting to the effects of climate change?

It needs to be recognised that due to non-designated sensitivities, some areas may have quality wind resources where the impact cannot be satisfactorily mitigated. For this reason, an explicit cross reference is needed between the aims of maximising the utilisation of the wind resource and constraints, irrespective of the size of the development.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer