



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

Local Plan - Post Inquiry Modifications Consultation – MCoS Response

The MCoS is the representative body for hill walkers, climbers and ski tourers, and is the only national representative body of the sport of mountaineering in Scotland. We have 10,500 members, and are recognised by the Scottish Government as representing the interests of all mountaineers. Mountaineers contribute approximately £150 million to Scotland's rural economy each year and are attracted to Scotland mainly where there are mountains, crags and a relatively wild experience. The MCoS interest in wind farms lie primarily in issues of public access and conservation. The latter includes biodiversity, soil and landscape.

Policy 2 The MCoS welcomes the strengthening of the terms of acceptability of adverse impacts on designated sites.

4.17 The MCoS welcomes the clarification of the precautionary principle.

4.23 The MCoS welcomes the commitment to producing supplementary planning guidance where a special area is not specifically protected by a designation. We feel strongly that this should be produced for both hill tracks outside the NSA and wildness qualities of the Park in general. The latter is not a site-based quality but a characteristic that may be present at varying degrees throughout the Park, hence will require innovative thinking with respect to supplementary guidance.

Policy 6 The MCoS experience of application of the test of minimisation of impacts has shown it to be very open to interpretation and therefore almost impossible to apply as policy. This is due to the fact that minimising impacts in reality would only be delivered by the development not going ahead. This of course should always be considered as a background option in planning decisions. Appropriate siting, layout etc can deliver only mitigation. The implication of mitigation is what can be deemed satisfactory by the planning authority. We would therefore suggest that in this policy, at least in this context, the word minimising and its derivatives should not be used. An option would be to use a similar form of wording as in Policy 15: "Development, including any ancillary works, will be sited and designed to have no significant adverse visual or landscape impact, including any cumulative impact."

4.45 The MCoS welcomes the inclusion of this section, particularly reference to wildness.

4.99 The MCoS welcomes the removal of the specification of "large scale" and "commercial" wind farms. Smaller, community-owned wind farms can have as significant impact as those traditionally regarded as large or commercial.

5.22 The MCoFS welcomes the inclusion of this section. It is vital that contributions are monitored so they can be assessed for delivering the associated policies and aims of this plan, rather than leaving open the potential for them being seen as a local pay-off to sweeten impact on a national resource.

Policy 33 The MCoFS welcomes this clearer rewording of an important policy. It is vital to make clear that tourist facilities should not be permitted to detract from the qualities of the Park that the tourists are attracted by in the first instance. Also they should not detract from the qualities that visitors and residents appreciate who do not choose to use those facilities.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer