



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493942
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

5/5/11

spg@cairnngorms.co.uk

Dear Ms Lax

CNPA Wildness Supplementary Planning Guidance Draft

The Mountaineering Council of Scotland would like to congratulate CNPA on this innovative first example in Scotland of providing greater clarity for both members of the general public and land management interests within the Park on interpretation of the national level policies on wildness as stated in the Scottish Planning Policy and National Planning Framework 2. This SPG is an excellent example of good practice in dealing with issues of wildness to other planning authorities. The MCofS is generally in support of the proposed draft as it stands, and the comments below are generally focussed towards increasing ease of understanding by non-planners.

Introduction

The MCofS supports the use of 3 bands as an appropriate compromise between wildness as a continuum, but needs of the mechanisms of application through the planning system. There would be benefit in consideration and explanation of how boundaries between the different bands are to be dealt with.

Wildness Typology

Although Figure 1 is a better reflection of the continuum that is wildness, for practical use in planning we consider that Figure 2 is a more workable approach providing greater clarity for both planners, members of the public and any potential planning applicants. Within these typologies it needs to be recognised that there may be varying sensitivities depending upon development type as, for example, tall or large structures will have greater inter-visibility between bands.

Wildness Band Descriptions

Band A

Ecological processes are generally prevalent, but it may be appropriate to clarify that what is meant here is “natural ecological processes,” or maybe the removal of the word “and” in the first box would make this clearer. In the overwhelming number of cases, buildings are inappropriate in this Band. In a very few very specific cases this may not be the case. A recent example of this is the Fords of Avon Shelter where planning permitted a rebuild of this very small, long-established and very discrete structure. See the following “mitigation opportunities” section comments with reference to the use of “mitigation” in this section.

Band B

The MCofS suggests that some clarification is necessary with respect of the meaning of the statement that, “development here should seek to enhance the essentially natural qualities through

discrete design and enhancements to the natural vegetation.” It needs to be made clear that development of itself will not “enhance the essentially natural qualities.” Design and micro-siting may mitigate the impact of development, but cannot enhance naturalness. In circumstances where one development was to be replaced by another, there is the possibility that naturalness will be enhanced, but this in comparison to the previous development. This opportunity for misinterpretation needs to be avoided by rewording this sentence to reflect this.

Mitigation opportunities

The current wording of the first sentence of this section needs to be re-considered to reflect the comments on Band B section. The later paragraphs would benefit from a clarification of the distinction between mitigation and compensation. Design and micro-siting of a development can mitigate (reduce) the impact of a development. Off-site works to restore or enhance would be compensatory measures, which may or may not satisfactorily compensate for the impact of the development. They cannot however mitigate the impact of the development.

Hill Tracks

The MCofS looks forward to the progression in the work started on guidance on the appropriateness of hill tracks. The meetings on this topic already conducted illustrated the differing interpretations of when a hill track is “required.” It would therefore be invaluable to cross-refer to the hill tracks guidance and fast track this piece of work such that there is greater clarity in how CNPA assesses the balance between need and impact, particularly on wildness. The MCofS also considers it a necessity to avoid multiple layers of ifs by re-wording the final sentence. “In some areas the wildness qualities are so sensitive that alternatives should always be considered,” creates an extra need in addition to assessing whether alternatives have been appropriately considered by introducing the notion that on some areas there is no need to consider alternatives. The MCofS strongly considers that in all locations, alternatives to hill tracks must be considered. This is due to their potential for profound impact on wildness and we consider they should only be used in rare exceptional, and thoroughly justified, circumstances.

An additional comment MCofS would make from experience as a professional organisation and as a reflection of the public’s experience of planning guidance; the fewer separate planning guidance documents the better. For this reason we suggest it is desirable to integrate this SPG in the Development Plan and Park Plan when the opportunity arises

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer