



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

## **Dumfries and Galloway Local Development Plan Main Issues Report**

Throughout the Main Issues Report, no reference is made to the inherent importance of wild land character. This omission may be apparent only, and implicit in references to landscape and visual amenity, but the requirements of SPP section 128 needs to be made explicit in the final LDP. Any relevant supplementary guidance such as any connected to renewable developments must also explicitly refer to wildness. Dumfries and Galloway has areas of this character which are important to conserve in order to maintain the regions landscape diversity.

### **Main Issue 5 - How best to deal with climate change and make the best use of natural and renewable resources?**

Both consultants reports (landscape capacity study for windfarm developments and a study to consider the potential for a broad range of renewable energy sources throughout the region) must take full cognisance of wild land character. Care must be taken not to rely on SNHs Search Areas of Wild Land as a pseudo-designation. They were never designed to be used as a comprehensive survey of wild land and there are a multitude of other areas that display high quality wild land character.

It is stated that, “the spatial framework will identify those areas that require significant protection from development and areas of search where there are no significant constraints.” This must not rely on presence or not of designated sites. SPP section 128 requires a high level consideration of wild land character. There is not a designation for wild land, so a mechanism must be found to fully integrate this consideration. One method would be to use a wildness mapping technique used in Cairngorm National Park, and currently being developed in Loch Lomond and Trossachs National Park and Highland Council area.

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

Yours sincerely

Hebe Carus (Ms)  
Access & Conservation Officer