



# 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

28/12/10

DevelopmentPlan@pkc.gov.uk

Dear Sir / Madam

## **Perth & Kinross Local Development Plan Main Issues Report – MCofS Response**

Please accept these comments from the Mountaineering Council of Scotland (MCofS). We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski tourers. We have over 10,000 members and aim to represent the interests of all the 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment.

### **Chapter 2: The Vision**

The MCofS wholeheartedly supports the statements that highlight the importance of the areas landscape. Developments should not, “detract from its attractiveness nor places an unsustainable burden on future generations” (2.2.6) and that it is vital to, “protect and enhance the character, diversity and special qualities of the area's landscapes to ensure that new development does not exceed the capacity of the landscape in which it lies” (2.3.2). The concept of capacity is particularly emphasised with respect to the character of wildness both in NPF2 and the SPP.

### **Chapter 4: Main Land Use and Delivery Issues**

The recognition in the Local Development Plan (LDP) of the link between the vision for the landscape in Chapter 2 and tourism in this chapter is essential. A quality landscape and visual amenity is a huge part of the basis of the local economy. This applies equally to the general landscape as well as the quality of any developments specifically to facilitate tourism. The wording of the tourism section emphasises the importance of the latter, but tourism developments are only relevant where there is demand created by the quality of the surrounding landscape. This is the existing asset that needs conserved, hence the need to explicitly cross-reference this section with 4.4.

The MCofS welcomes the recognition of the need to join up policy and strategy for development and environmental protection, and explicitly place the landscape at the heart of this balance. This is sadly often lost in the drive for development and the need to adhere to statutory requirements restricted to designated areas. The statement in 4.4.3 is vital to retain this in the final LDP.

The MCofS particularly welcomes the explicit statement of the requirement to consider wildness (4.4.4). There would be great benefit in clarifying that this applies to the wider countryside and is

not a pseudo-designation that has frequently been incorrectly applied to SNH Search Areas of Wild Land. Such inappropriate use has unfortunately led to confusion rather than clarification about the concept of wildness. The land exhibiting this characteristic is a challenge for planning as it is not a discrete area and requires a degree of subtlety in consideration. It is particularly worth noting that wildness is a characteristic in need of protection, according to SPP, at the national level of importance. This should be noted in the LDP, also that the quality as an inherent value as well as a setting for outdoor recreation and tourism.

Although assigning value to landscapes, as described in 4.4.8, is subjective, planning policy has to at some level make value judgement about what is acceptable change and what is not. These will inevitably suffer from not being absolute. Planning policy must accept this and take it into consideration bearing in mind the effects on future generations and what they may value, while not requiring a solid boundary on a map be drawn round every area of value. Planning must learn to apply fuzzy boundaries and landscape-wide qualities rather than relying on discrete hard-edged areas regarded of value surrounded by areas of little or no value. The way the LDP expresses landscape is a large part of achieving this.

Landscape Character Assessment (LCA) is cited in 4.4.9 as a policy approach for achieving sustainable landscapes, however MCofS would counsel against treating LCAs as a policy approach. LCAs are landscape descriptors, hence are not indicative of what is considered valued or less valued and therefore what should be prioritised for conservation against what can be permitted to be lost through landscape change brought about by development.

Wild land characteristics attract people for recreation to areas where they can enjoy the outdoors away from the pressures and sights on modern life, so promoting physical and mental wellbeing, as described in 4.4.10. The MCofS welcomes the intention to achieve better integration of wildness in all policies and planning guidance, and would request involvement in consultation on these at the earliest opportunity.

The MCofS supports efforts in, “retaining and, where possible, strengthening the area’s character and local distinctiveness.” Wildness is an important dimension to this, and an approach found valuable by the Cairngorms National Park, and soon to be realised also in the Loch Lomond Trossachs National Park, is fuzzy wildness mapping. Perth and Kinross could benefit from a similar approach.

The MCofS agrees that the concept of capacity of the landscape to, “accommodate further large scale wind farms due to their cumulative impact,” may have been reached or near to being reached. However, smaller scale wind developments can have as large an impact; small is not always beautiful. In some areas the limit of anything except micro-renewables may already be reached. For this reason it is essential not to treat the impacts of large and small wind developments separately and that any supplementary guidance, as referred to in 4.5.21, includes smaller renewable developments in the spatial strategy. It may be appropriate to treat micro-renewables separately as they are primarily closely associated with existing developments such as buildings, so have relatively considerably less potential impact than those developments less than 20MW.

This spatial strategy needs also to be integrated with policies on conservation of carbon stores currently locked up in wet soils, especially peat, which will be identified as stated in 4.5.23. It should be noted in considering this that tracks associated with all renewables developments may have as much, if not more, impact on release of carbon for the soil as the actual turbine foundations or impacts of a run-of-river scheme components. Full consideration of all impacts of developments is the only way to achieve protection of carbon soils stated as the preferred option in 4.5.24.

## **Chapter 6: Policy Framework**

The MCoFS welcomes the commitment that any reviews or additional guidance is to be, “consulted upon and given the same status as the content of the LDP when it is adopted” (6.4). The MCoFS would appreciate as early an involvement as possible in relevant guidance

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

Yours sincerely

Hebe Carus (Ms)  
Access & Conservation Officer