



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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17/6/10

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Dear Sir / Madam

MCoFS comments on TAYplan Main Issues Report

Please accept these comments from the Mountaineering Council of Scotland (MCoFS) on the TAYplan Strategic Development Plan. Many of our concerns are not addressed in the questions, hence not using the questionnaire format.

We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski mountaineers. We have 10,500 members including a large number in the Tayside area. MCoFS aims 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. Mountaineering makes a significant contribution to rural economies, including those in Tayside. Mountaineers contribute approximately £150 million to the Scottish economy each year. I have restricted comments to issues that are a priority for those we represent; primarily landscape, upland / crag ecology, access and recreation. This response is based on our consulted upon, and agreed, position statement available at www.mcofs.org.uk/access-position-statements.asp.

The MCoFS position is that the planning system exists to sustain the quality of the environment while permitting appropriately located and designed development. This necessitates that the development plan conserves, and where possible enhances, the natural heritage of the area. This includes biodiversity and landscapes. The plan must be drafted strategically with the perspective at the ecosystem level.

3 Quality Places - Environments and Settlements

Both Main Issues in this section primarily address issues relevant to urban and peri-urban environmental quality, as well as concentrating on the need to meet designated site duties. This section needs to explicitly recognise that the presence or absence of a designation is not a measure of whether the land has important qualities the planning system should take into account.

The section on landscape (3.6) states that the, "TAYplan area is characterised by some of the UK's most attractive and dramatic scenery." As little of the TAYplan area is designated as NSA, and that is the only landscape designation, the main issues need to reflect this by emphasising the link with wild land and the definition in the SPP. SPP section 128 states that, "the most sensitive landscapes may have little or no capacity to accept new development. Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity and planning authorities should safeguard the character of

these areas in the development plan.” Care must be taken not to misuse SNH Search Areas for Wild Land (SAWL) as a pseudo-designation. It is the wild character of all relevant land that needs safeguarded, not SAWLs. The emphasis of section 3.6 on designation needs revised to include delivery of other policies relating to landscape.

8 Quality Places - Vision

Paragraph 8.8 states that the vision is that, “some remote upland and wetland areas have been deliberately left to nature, becoming wilder in character.” This misrepresents what wild character is. Much wild land is actively managed and economically active and no less wild for that within limits. Land management that is often compatible with high wildness value include upland grazing or field sports or active woodland planting or regeneration. These are all integral to many areas across TAYplan area and, within appropriate limits, actually maintain wildness. Recent studies by SNH and Cairngorm National Park have shown that wildness is primarily negatively impacted only by modern human artefacts such as turbines, settlements, transport infrastructure, hill tracks and telecommunications masts. It is often perceived to be enhanced or at least not reduced by woodlands or grazing. The view of wild land in the vision should be altered to reflect this and not suggest that wildness depends on abandonment and absence of economic activity which inevitably distances many from the true concept and importance

9 Quality Places - Spatial Strategy

The spatial strategy concentrates almost entirely on settlement development. A spatial strategy is desperately needed for renewable developments, especially wind energy on and off-shore. The SPP states in the renewable energy section paragraph 184 that development plans should, “guide development to appropriate locations and provide clarity on the issues that will be taken into account when specific proposals are assessed.” This Main Issues Report does not achieve this. A spatial strategy is needed for renewable developments and should be consulted upon.

Yours sincerely

Hebe Carus
Access & Conservation Officer