



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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27/6/11

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Dear Sir / Madam

MCoFS comments on Proposed TAYplan

Please accept these comments from the Mountaineering Council of Scotland (MCoFS) on the TAYplan Strategic Development Plan. We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski mountaineers. We have 11,000 members including a large number resident in or visiting 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.

Policy 3: Managing TAYplan's Assets

The MCoFS welcomes the recognition of the importance of the landscape and that this asset should not be adversely affected, and the concept of "environmental limits." Specifically, we wholly agree with the necessity of, "identifying environmentally sensitive areas and important natural and historic assets where no or very limited development would be permitted." This is particularly important when there are no designated sites selected on the basis of some types of sensitivity, notably wild areas. The importance of wild character is highlighted in National Planning Framework 2 section 99 and Scottish Planning Policy section 128. SNHs Search Areas of Wild Land are not a substitute for a rigorous assessment as has been carried out in Cairngorms National Park. TAYplan and Local Development Plans in the area will be unable to achieve the aims of this policy without identifying where such characteristics exist. This policy needs to make a statement to the effect that this will be progressed as a matter of urgency. The other policies also require to be altered in order to deliver the stated intention to appropriately manage assets in accordance with national planning policy. These suggested alterations are explained below.

Policy 6: Energy and Waste/Resource Management Infrastructure

This policy states that, “Local Development Plans should identify areas that are suitable for different forms of renewable heat and electricity infrastructure.” As in the response to Policy 3, it is not possible to deliver spatial planning without first identifying where all of the valuable assets are located, particularly where there is no relevant designation such as wildness characteristics. Policy 3 should plan to map such areas, and this would enable a defensible energy infrastructure plan. This need is reflected in part C that states it is a policy that decisions be “justified” on the basis of the, “sensitivity of landscapes.” Landscape character assessments are a useful tool, but it is a descriptive system and says nothing about value and does not relate directly to the requirements of SPP and NPF2. Such mapping would also enable a justification for decisions on, “cumulative impacts.”

Policy 8: Delivering the Strategic Development Plan

Developer contributions do not, as suggested in the wording of this policy, “mitigate any adverse impact on infrastructure, services and amenities brought about by development.” Mitigation means to reduce the impact, but often the payments are not directly related to the impacts and therefore are compensation for adverse impacts. The primary difficulty is that compensation to local communities cannot offset adverse impacts of a national resource such as wildness character. This policy must recognise that developer contributions, however attractive, cannot be used to make palatable adverse impacts that affect a far wider community than the local residents.

Please do not hesitate to contact me for clarification or discussion of any of these points.

Yours sincerely

Hebe Carus
Access & Conservation Officer