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Mr Murray Ferguson
Director of Planning & Rural Development
Cairngorms National Park Authority
14 The Square
Grantown on Spey
Scotland
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3rd April 2019

Dear Mr Ferguson

Cairngorms Local Development Plan 2020

Thank you for the opportunity to comment on the proposed Local Development Plan for the Cairngorms National Park.

Who we are:

Mountaineering Scotland is a membership organisation with over 13,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Comment on Policies:

Policy 4 Natural Heritage

Policy 4.2 National designations

We welcome the statements to protect National Scenic Areas. The wording to protect the integrity of the area or the qualities for which it has been designated is clear. The intent in 4.2 (b) to provide compensation by the provision of features equal to any loss is commendable. However, but we have to query the ability of being able to deliver this for some features. Trees and woodland, yes, but incursions that change landform is harder to deal with and can be expensive. If expense of compensatory features results in the dropping of proposals, then the policy works.

We think that **Policies 4.4, 4.5 and 4.6** on protection for biodiversity effectively cover the range of situations and type of flora and fauna that may be affected by developments. The intent in

paragraph 4.69 to apply the Precautionary Principle is clearly stated.

Policy 5 Landscape

Policy 5.1 Special Landscape Qualities

We support the inclusion of wildness in the landscape character and special landscape qualities of the Cairngorms National Park. We agree that landscapes evolve and change – it is how they are changed that matters. Assessing proposals against clearly defined special landscape qualities will provide clarity for all.

Policy 5.2 Private Roads and Ways

We support this policy as it is much needed and will go some way to addressing the proliferation of unnecessary and over-designed moorland roads, those that do come through the planning system. The statement on the removal of redundant tracks and roads is very welcome.

A set of criteria for all moorland roads is, in our opinion, needed to assess proposals against so that those that come through Prior Notification are assessed on the same criteria throughout the Park.

We have concerns that paragraph 4.76 could become a policy loophole where a proliferation of informal ATV tracks that cause scarring across moorland could be used to create a new made track where no previously existed. A set of criteria to inform decisions on the need for Private Roads and Ways would be helpful in providing a baseline for assessing the need for a new road.

Policy 7 Renewable Energy

We support the policies on renewable energy. We do think that more attention must be given to potential construction and maintenance access roads. This is especially a concern for **Policy 7.2** with small-scale hydropower proposals as the highlands now has a legacy of over-designed tracks and roads in remote areas for periodic low-level maintenance, the visual impact of this outweighing the benefit of the development.

We ask the National Park authority to provide supplementary guidance on hydropower proposals in National Scenic Areas and Wild Land Areas that limits the construction corridor width, and reduces the specification for any maintenance access tracks or paths to 1.5m or less. Detail on intake weir facings and infrastructure would be appropriate and welcome.

We support **Policy 7.3** Wind Energy with regard to landscape impact.

Policy 10 Resources

We support the policies on use and exploitation of resources, especially **10.6** Minerals

Yours sincerely



Davie Black
Access & Conservation Officer
Mountaineering Scotland