



The Mountaineering Council of Scotland

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Piers Blaxter
Team Leader (Policy)
Aberdeenshire Council

by email to LDP@aberdeenshire.gov.uk

Your ref: 2015/0009547

Dear Sir

Aberdeenshire Council proposed Local Development Plan consultation: Comments by The Mountaineering Council of Scotland

We welcome the opportunity to respond to the consultation on the proposed LDP.

The Mountaineering Council of Scotland (MCoS) is an independent organisation with 12,500 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland. We also act on behalf of the 75,000 members of the British Mountaineering Council (BMC), which contributes both financial and policy support to our work on landscape matters in Scotland.

We provide our response below. Our comments relate only to those geographical areas within Aberdeenshire where mountaineering activities, as defined above, take place – that is, the mountains and foothills, the glens that penetrate them, and lowland and coastal climbing crags.

- Policy R3** The MCoS welcomes the proposed policy in relation to hill tracks.
- Policy E1** The proposed policy on Natural Heritage is supported.
- Policy E2** The proposed policy on Landscape is supported.
- Policy C2** The policy on Climate Change is not opposed. Local renewable energy policy is determined by national Scottish Planning Policy and while we have reservations about aspects of that, this is not the place to raise them.

We found the spatial dimension of the policy on wind turbines difficult to follow. The text and maps **for the administrative areas in Volume 1** often appeared inconsistent, perhaps because the maps always show “Strategic Capacity for Small, Medium & Large wind turbines” while the text usually refers selectively to specific sizes.

For example, in relation to Marr the text states: “There is no real opportunity for wind turbines within Marr except for areas to the north west and east of Huntly, and even in these areas there is only room for a small number of small wind turbines due to how they could affect existing sites.” However the map shows larger areas as having “Strategic Capacity for Small, Medium & Large wind turbines”. (added emphasis)

Greater clarity on the areas appropriate for different sizes of turbines would be helpful. Defining within the LDP what height range is meant by medium and large would also avoid uncertainty. (We presume 15m hub height – the only specific height mentioned – defines ‘small’.)

The **Climate Change map (p.63)** is also confusing. The text refers to areas of significant protection being shown but the map refers only to the 2km settlement buffer. The map key refers to ‘spatial framework’ which we think is a mistake since the areas referred to appear to be peat-rich areas. We would welcome a specific response to this submission giving assurance that these are not areas regarded as suitable for wind turbines.

On the assumption that the only areas in which wind farms will be supported are those areas shown on the Climate Change map as having ‘strategic capacity’, the MCoS is content with the proposed policy. It safeguards iconic local hills – such as Bennachie, Tap o’Noth, and the eastern Mounth including Clachnaben and Mount Battock – as well as the eastern approaches to the Cairngorms National Park.

We trust that you will find our comments of assistance. If you have any questions concerning our response, please contact me.

Yours sincerely

David Gibson
Chief Officer