



The Mountaineering Council of Scotland

The Old Granary
West Mill Street
Perth PH1 5QP
Tel: 01738 493 942

Please reply by email to david@mcofs.org.uk

By email to ldp@aberdeenshire.gov.uk

Planning Policy Team
Infrastructure Services
Aberdeenshire Council
Woodhill House
Westburn Road
Aberdeen
AB16 5GB

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Dear Sir

Proposed Special Landscape Areas Supplementary Guidance

We are pleased to provide our response to the consultation on the proposed Special Landscape Areas Supplementary Guidance. Due to the nature of our response, we have not used the response form but provide the following comments.

The MCofS is content with all candidate SLASs identified. The process of identification and the areas identified are appropriate within the Aberdeenshire context. In an area such as this all landscapes, including those with wildness characteristics, represent a mix of natural and cultural influences, reflecting a long history of human engagement with the land.

The interest of the MCofS is mainly in protecting and enhancing the qualities of upland areas, but there is also climbing interest on the sea cliffs within all **coastal candidate SLAs** which offer unique and accessible challenges. This activity is not recognised specifically within the Statements of Importance, but the significance of the cliffs themselves is clearly stated while the Forces for Change and Management Recommendations are consistent with maintaining the quality of the coastal mountaineering resource.

The **Bennachie** candidate SLA recognises one of the most distinct landscapes and one of the most iconic landmarks in northeast Scotland. The Statement of Importance is appropriate.

The **Clachnaben and Forest and Birse** and the **Braes of the Mearns** candidate SLAs fit well together, covering the important uplands east of the Cairngorm National Park and a prominent section of the Highland Boundary Fault. The Statements of Importance are appropriate but it would be desirable for the Management Recommendations to be stronger in relation to hill tracks (dirt roads), which in recent decades have been responsible for major physical and perceptual change through their fragmentation of the intact upland core.

We do not have capacity to review the proposed boundaries of candidate SLAs in detail and so simply accept that on a broad view they appear appropriate.

We regret that Tap o' Noth and The Buck are not included within SLAs but accept the reasoning behind this given in paragraph 6.34. We would hope, nonetheless can they can be afforded some recognition within the planning system as distinct landscape features. The Buck serves as a prime example of how the integrity of a landscape has been weakened over time by the unsympathetic construction of hill roads and a poorly located small wind farm.

To restate and highlight the one aspect of the proposed Supplementary Guidance where the MCofS regards modification as desirable: the Management Recommendations for those candidate SLAs where hill roads are recognised as a Force for Change should more strongly state the unacceptability of their further extension and the desirability of diminishing the visual and physical impacts of those already in place.

We would appreciate an acknowledgement of this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Gibson', with a horizontal line underneath the name.

David Gibson
Chief Executive Officer