

## The Mountaineering Council of Scotland

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The Development Plan Team Planning & Place, Communities County Buildings Market Street Forfar DD8 3LG

Dear Sir

## Angus 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 (MCofS) 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 Scotlish 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, referenced to the relevant proposed policy. Our comments relate only to those geographical areas within Angus 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 PV3 The proposed policy regarding Access and Informal Recreation is supported.

Policy PV4 The proposed policy regarding Sites Designated for Natural Heritage and

Biodiversity Value is supported.

Policy PV5 The proposed policy regarding Protected Species is supported.

Policy PV6 The proposed policy Development in the Landscape is supported. In

particular, we support the wording used in paragraph 3 where 'adverse effect' is not qualified, as developers will argue it should be, by words such as 'significant' or 'unacceptable'. Instead, the policy would enable all adverse effects to be judged in the context of the proposed development, its landscape setting and the mitigation and remediation proposed. This is appropriate and

we support the approach taken.

Policy PV9 Angus Council is constrained in the approach it can take to Renewable and

Low Carbon Energy Development by the unstinting support required by national Scottish Planning Policy. We would wish for a more balanced and truly sustainable national approach but this is not the place to argue for that.

The MCofS very strongly supports the position taken in the proposed LDP on

page 55 that the Highland area, as mapped in Figure 2, is unlikely to be suitable for 'larger' turbines. The wording might more clearly express what we believe is the intention by using the phrase 'large or multiple turbines', consistent with the earlier reference in the same paragraph to the possibility of 'individual turbines' (and presumably smaller?) being satisfactorily accommodated.

We assume the definition of 'larger' follows that in the Strategic Landscape Capacity Assessment for Wind Energy (i.e. 80+m BTH). The definition should be included here for the avoidance of doubt.

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