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**The Mountaineering Council of Scotland**

The Old Granary  
West Mill Street  
Perth PH1 5QP

[REDACTED]

Forward Planning,  
Scottish Borders Council,  
Newtown St Boswells,  
Melrose  
TD6 0SA

[REDACTED]

8 January 2014

Dear Sirs

**Scottish Borders 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. Unfortunately we have been unable to use the online response process due to difficulties with the website.

By way of introduction, the Mountaineering Council of Scotland is an independent organisation with 12,000 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 on the attached page, referenced to the relevant sections of the plan:

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

Kind regards,

Yours sincerely

[REDACTED]

David Gibson  
Chief Officer

**Scottish Borders proposed Local Development Plan consultation  
Comments by The Mountaineering Council of Scotland**

Para 2.16	<i>In the absence of a strategic national plan for the siting of wind power stations, and given relentless developer pressure on Scottish Borders Council area - promoted by excessive UK government market incentives and Scottish Government political ambition - the proposed LDP does its best and we support it in that.</i>
ED9 - Figures	<i>Figures ED9a, especially, and ED9b are unhelpfully confusing. The relationship with Figures ED9c-ED9e appears inconsistent. In particular the Broad Law-Hartfell area is split between significant and moderate constraint in Figure ED9a but there is no matching split on any of the other Figures. We support the clear spatial strategy set out in Figures ED9c-ED9e and suggest redrafting of Figures ED9a and ED9b to be consistent with them.</i>
ED9 - Para 6.10.10	<p>We support the proposed supplementary guidance. We welcome the exclusion of the Broad Law-Hartfell area, Cheviot-Carter Bar border ridge and Pentland Hills from suitability for &gt;50m blade-tip turbines. Smaller turbines are not only less visually intrusive, provided they are well sited, but are also easier to remove with less long-term damage to local landscapes and ecology.</p> <p>We suggest that the word "significantly" be inserted into the sentence: "If there are judged to be significant adverse impacts that cannot be mitigated, the development will only be approved if the Council is satisfied that the contribution to wider economic and environmental benefits [significantly] outweigh[s] the potential damage to the environment or to tourism and recreation.</p>
EP4	We support this policy and particular commend its recognition that the quality of NSAs must be safeguarded from potential adverse impacts of development both within and outwith the designated area.
EP5	We support this policy and particular commend its recognition that the quality of SLAs must be safeguarded from potential adverse impacts of development both within and outwith the designated area.