

# Assessing impacts on Wild Land Areas – technical guidance – consultation

## Page 2: RESPONDENT INFORMATION FORM

Q1. Are you responding as an individual or an organisation?

Individual

Q2. Your name or your organisation/ group name

**Name**

Q3. email

**Email**

Q4. How do you wish your response to be treated?

Publish response but not my name.

Q5. If required, may we contact you regarding your response?

Yes

## Page 3: CONSULTATION QUESTIONS

Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas

No

**Comments/explanations:**

Clarification:

Roles and responsibilities of parties undertaking or auditing WLA assessment, and the status of opinion:

- Will SNH take a lead role as consultee on WLAs, and be responsible for monitoring / auditing the quality of the WLA assessments prepared by developers, or is it anticipated that Local Authorities will do that?
- Would the SNH position on wild land over-ride that of other consultees?

Para. 3: Relationship of WLA assessment method to LVIA / GLVIA methods. Needs care to apply this given there are some specifics particular to each. Eg. LVIA groups physical resource and experiential aspects both within landscape, but distinguishes landscape and visual within the method.

Para. 5: the need for an assessment stated as being the exception when outwith the WLA. Earlier guidance

Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas

(2007) puts a level of importance on the relationship of WLAs to their surroundings. See 2007, 3.1:

- 'A detractor does not have to be within an area of wild land to affect it.'
- 'Wild land can be damaged, if not lost, through the cumulative effect of detractors around the edges.'
- '...low scoring areas contribute to the whole (especially areas at the edge). So a baseline score of low being damaged further may still be a significant problem.'

Suggest the need for assessment should reflect the scope for potentially significant effects on physical and perceptual attributes, as per GLVIA and regardless of whether in or out of the WLA. See also discussions for paras. 11 and 25.

Para. 6: 'A suitably qualified and experienced landscape or planning professional(s) (referred to in this document as 'the assessor') should undertake the assessment.'

The guidance is aligned to the broad approach of LVIA / set out in GLVIA (para. 3), and within the EIA processes it is suggested landscape professionals play the key role in LVIA's, and potentially the wider EIA process (GLVIA3, para. 1.18. Highest professional standards suggest at least chartered members of the Landscape Institute (CMLI).

Suggest this should read: A professionally qualified and experienced landscape architect.

Para. 10:

- Sets out the important premise that whilst subjective, with informed (professional) judgement and a systematic transparent, consistent method, there is a sufficient commonality of what constitutes the quality of wildness. However, later paras. undermine this. See para. 23.
- Whilst referring to the physical aspects of areas, the physical attributes are also subjective in nature, and measured as relative values: eg. perceived naturalness, ruggedness – also an adjective of degree.
- Possible distinction of assessment methods between physical attributes, which could be measured / zoned as per LCA, and perceptual responses, which are likely to reflect spatial analysis based on topography.

Paras. 11 (and 25): 'Development located outwith WLAs may only impact on perceptual responses.' Physical attributes still of relevance:

- See discussion for para. 10.
- The surroundings of WLAs influence the experiential aspects of WLAs, but also can have a role or function on the physical attributes, eg. as a backdrop or skyline feature.
- Features could be perceptibly within the WLAs, even where they lie outwith.
- Appreciation of physical attributes can be heightened through (for example) qualities such as contrast and transition.
- The impacts of development located outwith WLAs will vary depending on the scale of WLAs.

Para. 15:

- Please clarify how the contribution of smaller and peripheral areas are assessed in relation to the WLA as a whole. What are the thresholds of significance in terms of the degrees of contribution of its constituent parts to the whole WLA? When would a localised effect be considered significant / unacceptable, and when not significant / acceptable?
- There seems to be some prejudice against assessment of development 'just within or adjacent to...' the WLA boundaries. If the boundaries are identified for strategic purposes then it might be relevant to extend consideration beyond them on a case by case basis. However, the implication seems to be to minimise the of limiting effects WLAs, rather than to objectively identify significant effects on physical and perceptual attributes, regardless of boundary.

Para. 18: baseline variations. Given likely variation in the geographical distribution of baseline physical / perceptual attributes, is it intended that the WLAs be assessed in sub areas / spatial units, or as a whole?

Para. 21: 'A wild land assessment should only consider effects on the qualities of the WLA as they are experienced within it, not from outwith it.' Disagree. Aspects of setting are important, and the contribution the WLA makes to wider landscape contexts, as is the wider experience of approaching WLAs. Even given the experiential remit of WLAs, rather than scenic or visual qualities, disregarding the role the areas have beyond the physical boundary misses both the physical contrasts (of naturalness, development character, ruggedness, remoteness / accessibility) an area provides in relation to surroundings; and the associated perceptual responses (sanctuary, solitude, inspiration), which even a distant view may provide.

Para. 23: This paragraph undermines / misleads:

- Sentences 2 and 3 of this paragraph repeats para. 10. However, the final sentence, 'When evaluating the significance of effects, the subjective nature of perceptual responses should be taken in account.' undermines the important premise that, 'But there is sufficient commonality in appreciation to identify a set of attributes and responses that can be assessed if presented in a systematic, transparent and consistent way...'

Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas

- Also, whilst referring to the physical aspects of areas, the physical attributes are also subjective in nature, and measured as relative values: eg. perceived naturalness, ruggedness – also an adjective of degree. As such, this distinction is not relevant in terms of perceptual responses being in particularly subjective..

Para. 25: ‘...only in exceptional circumstances relating to scale, siting or design will development outwith WLAs have a significant effect.’ Disagree:

- This statement seems to reflect an assumption of the 2017 methodology that has developed subsequent to the 2007 guidance. See comments on para. 5.
- The assumption appears to stem from a desire to retro-fit the wild land assessment method to SPP, rather than any evidence base or new research.
- The assumption undermines and de-values the objective to identify, potentially significant effects on physical and perceptual attributes, for which a development outwith WLAs could give rise to significant effects.
- The statement contradicts Q&A 5: ‘The baseline condition of the WLA is described within the wild land description as a set of wild land qualities. Where any of these qualities are affected by development, regardless of where it is sited, they should be considered.’

Para. 26: ‘...it may be appropriate to consider the scope for removing and / or enhancing existing features that detract from wildness...’ Agree: compensatory mitigation to offset adverse effects in a marginally acceptable scheme potentially a good thing.

Overall comment on Guidance on WLA Assessment:

Needs more on tests, thresholds and criteria in order to:

- Set out the principles clearly, possibly illustrated (as per SNH 2014 Siting and Design Guidance)
- Determine degrees of effects.

More on cumulative effects as per 2007?

Q7. 2) Are the examples within Annex 2 helpful in illustrating the approach to assessing impacts?

Some sections

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**Comments/explanations:**

Difficult to understand how judgements have been made without more context.