

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

## Page 2: RESPONDENT INFORMATION FORM

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

Organisation

Q2. Your name or your organisation/ group name

**Name** Cairngorms National Park Authority

Q3. email

**Email**

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

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Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas

Some sections

**Comments/explanations:**

In relation to step 4 (assessment of effects) and step 5 (judgement of significance) we would recommend that these stages are undertaken on the basis of the proposal and its embedded mitigation (that included in the development description of an ES or planning application for example). The next stage (step 6) would be the assessment of potential for further mitigation and (step 7) a judgement on any consequent change to the significance of effect identified at step 5. Just because there is theoretical potential to reduce effects it does not necessarily mean that it will be applied, so for clarity the steps need to be kept separate. Potential further mitigation may be applied and the development proposal altered, or the potential further mitigation may form the basis for planning conditions which require the mitigation to be undertaken, or if it makes no difference to the significance of the effect it may not be acted upon at all. From a planning/decision-making perspective the nature of the proposal needs to be absolutely clear. The type of works suggested in box 2 as examples of potential mitigation could alter the nature of a development substantially. That mitigation could become an

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embedded part of the proposed development prior to it going through a planning process, or it could change the development to the degree that a formal amendment or revised application is necessary. The Wild Land assessment process needs to be clear whether it is being carried out by a consultant as part of an ES/planning application/other application, or by a local authority planner/landscape adviser to inform a recommendation, or by a third party to inform a submission.

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

No

**Comments/explanations:**

The examples are, as it states in the text, hypothetical and not complete. As many people looking at the guidance will be doing a wild land impact assessment for the first time I think that it would be more helpful to have fewer, more complete examples and if possible real enough to be able to include a map of the study area. As they are, I find the examples not detailed enough to be that helpful.