

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 David Gibson

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Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas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

The technical guidance focuses on general principles set out in the GLVIA and does not take account of the processes used to originally map WLAs, ignoring the advantages of the original mapping which was intended to provide a methodology which would be transparent to interested parties and importantly, capable of repetition. After reading the draft in which it is proposed to give the assessor the remit to establish the baseline one cannot but feel that the result will be further erosion of the qualities of wild land from the margins, resulting in a deterioration of what is a finite resource over time. WLAs should be a designation in SPP in which no significant developments are permitted.

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

No

Comments/explanations:

Example 2 refers to location of a mast 'lower down the foothills'. This in itself, is not a guarantee of mitigation of visual impact as was seen recently by a proposal by EE to locate a mast in the middle of Glen Etive. The proposal was not objected to by SNH and this is a prime example of a WLA which would have been severely impacted by following the proposed guidance. Example 4a is clearly based on the principle that the circumference of a WLA is not as important as the interior. How would WLAs be protected from attrition if this principle is followed? It is clear from this example that being part of a WLA does not provide adequate protection from what may well be intrusive developments.