

# 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** Landscape Institute Scotland

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Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas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

1.Context and scope of consultation: 1.1 It is not clear what is meant by text in this section which states: "The revised guidance will now be the "starting point" for those undertaking an assessment of impacts on a WLA" (LIS emphasis). This seems to indicate some ambiguity regarding the status of the document. 1.2 The same section states that the descriptions (of each of the WLAs) are not being consulted on. It was understood from the previous round of consultation on the draft guidance produced in 2014 that there would be consultation on the WLA descriptions. Given the integral part of the descriptions in the process set out in the methodology, it would seem important that there should be consultation on these descriptions. 1.3 This concern is based on review of various different WLA descriptions and the often lengthy and sometimes generalised, rather vague nature of these descriptions. From an initial review of some WLA descriptions undertaken by some members, it is considered difficult to identify clearly what the key qualities are that contribute to, either as physical attributes, or perceptual responses which characterise any particular WLA. 1.4 Concern that the scope of the

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assessment relates only to WLAs. It is suggested that the Guidance could be applied to areas outwith mapped WLAs which display wildness as a key characteristic and as identified in the background mapping preceding identification of the mapped WLAs. 1.5 Concern that the WLA mapping is not referred to in the document. 2. Technical Guidance comments: 2.1 The guidance is very different in terms of process, method and level of detail provided compared to the draft guidance issued in 2014. LIS would encourage clearer technical guidance in this document which is as robust as the previous guidance. Given the limited technical content, it is felt it is not clear who the intended audience is for this draft guidance. 2.2 There is some concern that the guidance refers to GLVIA3, but does not seem to follow this guidance. Specifically, there is no reference to value and susceptibility but only sensitivity and would encourage this to be clarified and addressed. 3. The Assessment Process - Step 2 Establish the baseline 3.1 The draft guidance states that the assessor should "confirm" the wild land qualities of the study area and the nature of the contribution to the WLA. It is not clear whether SNH expect the WLA descriptions to be repeated here, or, which would seem more appropriate, the assessor should identify the extent to which the WLA descriptions are apparent in the study area. 3.2 Noted that the physical attributes and perceptual responses which have resulted in any WLA being identified are likely to be present to varying degrees within any part of the WLA. However, it is not clear what is required here, and there is no information on how to interpret the physical attributes and perceptual responses identified within any study area. 4. Assessment Process - Step 3 Assess the sensitivity of the study area 4.1 There is no information on how the sensitivity of the baseline has been assessed. 4.2 Suggestion made that the assessment of magnitude of change could identify the extent to which any proposed development would "enhance, erode or change" WLA qualities.

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

Some sections

**Comments/explanations:**

It would be helpful if the examples given in the document could be related to actual referenced WLAs so that readers could see the relationship between the baseline description and the WLA descriptions.