

# 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** Peter Willimott

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Q6. 1) Does the 2017 draft guidance provide a clear explanation of the methodology and general principles for assessing the impact of development proposals on Wild Land Areas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 methodology for the mapping of wild land areas in Scotland uses 4 key factors. These are: 1. Perceived Naturalness With two key attributes: 1.1 A high degree of perceived naturalness in the setting, especially in its vegetation cover and wildlife and in the natural processes affecting the land. 1.2 Little evidence of contemporary use of the land. 2. Rugged or Challenging Terrain. This involves analysing the slope and relative relief of the terrain and the calculation of the standard deviation of the terrain curvature. 3. Remoteness from Public Mechanised Access. Measured by using Naismith's formulae from the nearest public mechanised access point and the ruggedness of the terrain. 4. Lack of Built Modern Artefacts. The theoretical visibility of buildings and structures such as roads, vehicle tracks, pylons, railways, masts and wind turbines is calculated using a tool developed by Leeds University. The 4 key factors are then combined, with equal weights being applied to each, to give the relative wildness used in determining wild land areas. This method maximises the objective element in the mapping process and there is a strong case for using it in assessing the impact of

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development proposals on Wild Land Areas. However the draft guidance states in Para 1: 'The Wild Land Areas map is a spatial planning tool and therefore an assessment of impacts on wild land areas must be informed by more detailed consideration of the specific nature of each development'. Key elements in this more detailed consideration are the Environmental Impact Assessment (EIA) and the Landscape and Visual Impact Assessment (LVIA). I have concerns about the impartiality of these 'more detailed' considerations and these are reinforced by the 'Guidelines for Landscape and Visual Impact Assessment 3rd Edition' which in para 2.16 of the consultation edition states: 'LVIA has some significant characteristics that distinguish it from several of the other topic areas that are covered in EIA. One is the degree to which it relies upon judgements about the nature of change, its effects and their significance, when it is known that people's attitudes to that change may vary widely. The other is the extent to which those carrying out LVIA may also be engaged in the process of designing aspects of the proposed scheme itself.' Judgements may also be influenced by factors such as Recreational Enhancement Funds (REF) offered to the local communities affected by developments. An example of this is the £34,000 per year for the life of the development offered by the developers of the proposed Caplich Wind Farm (ref: 15/00197/S36). Most developments within Wild Land Areas will almost certainly lead to a reduction in the values of 2 of the 4 factors (3 and 4), and possibly also factor 1, used in the mapping process. The relative wildness figure of the local area will be reduced, probably by a significant amount. I would reason that only in very exceptional circumstances should such developments be approved. Developments on the fringe of Wild Land Areas will generally only affect factor 4, the 'Lack of Build Modern Artefacts', by impeaching on the view within the wild land area. In some instances however new tracks or roads constructed near the boundary of the WLA can affect factor 3 (Remoteness from Public Mechanised Access). These effects may or not be significant. In the assessment of any development affecting a wild land area, wild land mappings of the area before and after the development should be obtained to assist in a quantitative evaluation of the development. I would reason that, only in very exceptional cases should developments be allowed that impinge on Wild Land Areas. For developments affecting wild land areas the developer should pay 'up front' the cost of a bond to restore the land when the project ceases to function.

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

Some sections

**Comments/explanations:**

Example 1a: Run of river hydro-electric proposal located within a Wild Land Area. Consider the existing 5 Km track that is to be upgraded to facilitate the site. Is it visible? Does it exist as a track currently or is it just a footpath? It is unlikely to be currently accessible by vehicles and its 5km intrusion into the WLA will significantly reduce the Remoteness factor in the development area. Long term, although it may be camouflaged slightly by a green belt in its centre it will remain visible and, on occasions may require vehicular access. It is likely to have a significant effect on factor 3 (Remoteness from Public Mechanised Access) in the mapping process. Consider also the effect on 'the large and promoted waterfalls'? If, as is implied, the development is above them, the track is likely to be visible beside them from distant views of the 'promoted' falls, perhaps from outside the WLA? Will the flow of water in the falls be changed also? It may be that the structure has little effect on factor 4 (Lack of Build Modern Artefacts) but this should be considered. The effect on remoteness alone could be significant. This development should almost certainly be turned down. Example 1b: Impoundment hydro-electric proposal located within a Wild Land Area. This development will significantly affect on factors 3 (Remoteness from Public Mechanised Access) and factor 4 (Lack of Build Modern Artefacts). Almost certainly this application should be turned down. Example 2: Telecom mast proposal located within a Wild Land Area. All too often access tracks to telecom masks, wind farms and the like are just left and the landscape is not restored. Even if the landscape is restored the sense of remoteness will be drastically reduced. In this case the construction of the bridge will also reduce the remoteness. Long term of course some vehicular access will be required for maintenance tasks. Despite the telecom mask's location it will still have a significant adverse effect on perceived naturalness and detract from the 'lack of built modern artefacts' effects. In my opinion this development should likely be assessed as having a significant effect and turned down. Example 3: Wind farm proposal located partly within and partly outwith a wild land. If new mechanised tracks are required on the boundary of the WLA the development is likely to have significant effects on factor 3 (Remoteness from Public Mechanised Access). It will also have a significant effect on factor 4 (Lack of Build Modern Artefacts). Almost certainly this application should be turned down. Example 4a and Example 4b: Wind farm proposals located outwith a wild land area. These are apparently almost identical applications with 4a accessed as not having a significant effect but 4b being significant. The major difference in the applications is that in 4a 'The visual spread of the proposal has been limited by relocating and removing some turbines which

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appear as outliers when viewed from within the WLA. As a consequence, the proposal is sited where it would be largely backclothed by more distant landforms. This design has reduced the effects of development on long, channeled views from the interior of the WLA.' And 'Through the iterative design process the turbines have been reduced in height in order to remove all visibility from the interior where the sense of remoteness, sanctuary and solitude The differences in the assessment of the applications will be the visual effect measured by factor 4 (Lack of Build Modern Artefacts). Clearly 4a will score lower than 4b here and there is a possibility that it could be accepted whilst 4b is turned down.