

Scottish Natural Heritage
via email to: landscape@nature.scot

08 September 2020

Landscape Sensitivity Assessment – Guidance for Scotland (Consultation draft)

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy industry. We represent around 260 organisations working across the full range of renewable energy technologies in Scotland and around the world, from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

We believe Landscape Capacity Studies should be replaced with Landscape Sensitivity Studies to inform (but not over-rule) site-specific project assessments. We therefore welcome the opportunity to comment on SNH's 'Landscape Sensitivity Assessment – Guidance for Scotland' consultation draft.

We are concerned that the guidance appears to suggest that existing studies remain 'fit for purpose', as we consider that is not the case in relation to the majority of existing wind farm capacity studies, though many of those studies have some content that could be of use in developing new sensitivity assessments.

Our detailed comments on this consultation are set out in the following pages.

If you have any questions on the comments set out in this response, please do not hesitate to get in touch.

Yours sincerely

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Consultation Response

SNH Landscape Sensitivity

Assessment – Guidance for Scotland

This document sets out Scottish Renewables members' views on changes required to the draft guidance in order to avoid a continuation of landscape capacity and sensitivity studies that seek to restrict renewables deployment.

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1 Executive Summary

Considerations in relation to the consultation draft document and the Scottish Renewables response can be split into the following main themes:

- a) **Capacity vs. sensitivity** - The intention to move away from 'capacity assessment' towards 'sensitivity assessment' is welcome, but the 'capacity' mindset appears to remain in the language used in some parts of the document and in the approach it advocates. The guidance as it stands seems unlikely to drive a mindset shift from seeking to restrict renewables development to seeking to provide background information to inform project LVIAs.
- b) **Approach to landscape value** – the approach to landscape value is not clearly defined; is disconnected from established best practice and could be better described.
- c) **Focus on technical guidance** - The guidance provides a mix of advice about the technical requirements for assessment and tips on how to procure and manage the production of an assessment. We suggest that it would be better to focus the guidance on the technical aspects, moving the management advice to an annex, or a revised version of 'A Guide to Commissioning a Landscape Capacity Study Toolkit'.
- d) **Clarity and tone** -The drafting could be improved to remove repetition and unclear wording. The guidance also occasionally makes assumptions about the reader's opinions and such assumptions should not form part of best practice guidance.
- e) **Relationship to other guidance** - The relationship of this document to other SNH guidance is unclear. Tensions are created with other guidance and it is critical that these are resolved as part of the publication of this guidance. If they are not, the burden of resolving the differences between the documents is placed onto applicants and decision makers during the determination of development applications.

Our primary concern is that the interaction of language/approach, misleading examples, lack of clarity and an unresolved relationship to other guidance may mean that 'business as usual' prevails, with the guidance failing to achieve a meaningful change in approach to the consideration of landscape sensitivity in relation to renewables projects.

We recognise that the guidance is seeking to cover sensitivity studies for forms of development (such as housing) where they may be important tools to inform spatial policy; and those forms of development (such as onshore wind) where spatial policy is set by other criteria (e.g. SPP). Considering the urgent need to address the Climate Emergency, we feel that it is important that the guidance does not blur this distinction and through lack of clarity allow a continuation of assessments which seek to create local spatial policy for wind farm development.

The inclusion of some worked examples in an Appendix would have been very useful (and would have been helpful to include at the consultation stage). Natural England's *An approach to landscape sensitivity guidance 2019* provides a good example in this respect.

2 Theme A – Capacity vs. sensitivity

2.1 Introduction

The intention to move away from ‘capacity assessment’ towards ‘sensitivity assessment’ is welcome, but the ‘capacity’ mindset appears to remain in the language used in some parts of the document and in the approach it advocates. The guidance as it stands seems unlikely to drive a mindset shift from seeking to restrict renewables development to seeking to provide background information to inform project LVIAAs.

2.2 Comments

There are two ways in which the guidance appears to retain a mindset of considering capacity rather than sensitivity – the approach and the word selection – as set out below.

2.2.1 Approach

Explanation of terms

Paragraphs 5-8 are perhaps useful background information for a limited audience at this consultation stage, but unhelpfully blur the boundaries between capacity and sensitivity studies and appear to suggest that a ‘continue as before’ approach is acceptable/encouraged. References to previous changes and discussions which readers may not have been aware of also make this section confusing.

The guidance needs to clearly set the path forward. We recommend that this section be replaced with clear justification for why this new guidance is needed. This would involve referencing GLVIA3 and evolving best practice. The Natural England sensitivity assessment guidance contains a helpful description that could be used in this section to clearly explain the difference between capacity and sensitivity as follows:

“There has been confusion concerning the use of the words ‘sensitivity’ and ‘capacity’– often they have been used interchangeably. Sensitivity and capacity have different meanings. When dealing with an area’s sensitivity the question relates to, ‘to what’? When dealing with an area’s landscape capacity – perhaps to absorb a certain amount of development without unacceptable changes to landscape character – the question generally relates to, ‘how much’? Importantly, a sensitivity study will identify areas of relative sensitivity to particular development scenarios.”

It is not helpful to continue blurring these differences on the basis that is what has historically been done in Scotland (para. 5). Failing to clearly state this difference may allow the continued publication of studies that seek to define ‘how much’ development is acceptable – just renamed as sensitivity assessments.

The definition of sensitivity from GLVIA3 might be usefully moved to the ‘definitions’ section at the start of para 12.

Suitability for development

A key difference in considering sensitivity rather than capacity is that no area should be considered unsuitable for development or unable to accommodate development – areas may be assessed as more sensitive to change or less sensitive, but that is as far as a sensitivity

study assessment should go. Judgements regarding whether development should or should not happen in more sensitive areas are a matter for policy and should not be either implicitly or explicitly made in a sensitivity study.

The draft guidance retains a focus on identifying suitability for development. In particular this is embodied in the approach at 3.15 where it is suggested that design guidance should be restricted to areas ‘identified as having some sort of potential to accommodate development’, and again at 5.3 where it is suggested that a sensitivity study would have identified ‘predicted locations’ for development which should be reviewed.

Outcomes & purpose

A sensitivity study can provide valuable advice to decision makers and developers in seeking to guide development to more suitable locations. However, the most useful elements in the better studies are the analyses of what is important to the character and value of an area of landscape. It is these detailed considerations which enable better decision-making.

Section 3 of the document appears to focus instead on the sensitivity ratings as being the most important outcomes of the assessment. This is noticeable at 3.3 which suggests sensitivity maps as a key draft output for review, and at 3.9-3.10 where it is assumed that the ratings are the purpose of the assessment and the considerations behind that are merely supporting information. A change of emphasis to make analysis and advice as important as ratings would be beneficial.

Constrained scenario focused approach

Section 2.1 encourages quite specific scenario descriptions; however, this can lead to constraining and complex studies which easily become outdated. The suggestions at 2.1.1 and 2.1.2 are more appropriate for design advice and that level of detail about design and materials or tree species should not be included in scenarios. The advice that development design should be assumed to conform with best practice is important and is a sufficient basis for a suitably experienced assessor to work with along with broad parameters regarding the nature and scale of development.

It is possible to do things differently to produce assessments which are more adaptable. For instance, the traditional approach to wind feasibility studies often uses a grid like that below:

Criterion	Considerations	Under 50m	50-100m	100-150m	150m +
1 xxx	A description of susceptibilities relevant to the character area	Description and susceptibility rating	Description and susceptibility rating	Description and susceptibility rating	Description and susceptibility rating
2 yyy	A description of susceptibilities relevant to the character area	Description and susceptibility rating	Description and susceptibility rating	Description and susceptibility rating	Description and susceptibility rating
etc					

Overall rating		Sensitivity rating	Sensitivity rating	Sensitivity rating	Sensitivity rating
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However, it is possible to construct a different approach such as:

Criterion	Considerations	Farm scale single turbine	Commercial wind farm	Height sensitivity
1 xxx	A description of susceptibilities relevant to the character area	Description and susceptibility rating	Description and susceptibility rating	This criterion is not affected by turbine height.
2 yyy	A description of susceptibilities relevant to the character area	Description and susceptibility rating	Description and susceptibility rating	Taller turbines may cause increased effects on this criterion if ...
etc				
Overall rating		Sensitivity rating	Sensitivity rating	

This avoids overly granular assessments and encourages description of the circumstances under which sensitivity may increase due to larger scale developments (for instance if it becomes widely visible from an adjacent designation). Larger development proposals than those envisaged as a 'commercial wind farm' at the time of assessment can then be considered against the descriptions in relation to height sensitivity. This approach could be applied to other forms of development, although for housing or solar farms the scaling is more likely to relate to site area or numbers of dwellings than height.

Approach to visual criteria

Visual criteria are more valuable for considering capacity than they are for landscape sensitivity, but the guidance does not appear to recognise this point. This is important as sensitivity studies which make excessive or inappropriate use of visual criteria form a less sound basis for LVIA of development proposals because LVIA is required to consider visual sensitivity and effects separately from effects on landscape character.

For example, if a sensitivity study includes visibility from a settlement as a visual susceptibility criterion (as appears to be suggested at para. 2.2.8), whereas an LVIA would not use that criterion when considering sensitivity of the character area as it does not relate to potential effects on landscape character, but to potential effects on visual receptors. This may mean that an LVIA appears to ignore part of the sensitivity assessment when it does not and is simply using the information as required for the task in hand.

Where they are used, visual criteria in a sensitivity study should relate to characteristic views, such as highlighting that views out to the sea are an important element of the character. The nature of views (large or small scale; enclosed or open etc.) – is a valid landscape character

criterion, but consideration of visual receptors (as defined in GLVIA) is not part of landscape sensitivity assessment.

Identifying important views and visual receptors (such as settlements, key routes, views of landmarks or from important viewpoints, and ‘gateway views’ in specific directions) is also helpful in understanding the potential visual effects arising from development, but where undertaken is best kept as a separate element of the study and not mixed with character criteria in reaching evaluations for sensitivity.

2.2.2 Wording

In addition to the sections of the text discussed above, Table 2.1 below sets out instances of wording which should be rephrased to better focus on sensitivity rather than capacity:

Table 2.1 Suggested rewording to better focus on sensitivity

Para	Wording	Suggested	Rationale
3	“Our landscapes continue to change in response to natural processes and human interventions. Decisions made about introducing built development and land management play a big part in what this change looks like.”	Our landscapes continue to change in response to natural processes and human interventions including built development and land management practices.	The second sentence is unnecessary and regards development as something ‘introduced’ rather than part of the human influence on landscape.
3	“The scope for landscapes to accommodate new land uses and development without losing their character and qualities varies from place to place.”	Landscape sensitivity assessment is a process that can help decision makers to understand likely changes and the nature of change should particular courses of action - the development / land management scenarios – be taken forward.	‘scope to accommodate’ is a description of capacity. ‘losing their character’ implies that landscape change is intrinsically harmful. Landscape character becomes different when it changes but ‘loss’ would only arise where an area of unique character became the same as other areas, resulting in a reduction in diversity.
15	“The sensitivity study also offers an early steer to applicants that a location might be more (or less) sensitive than others in the area, and provides an indication of the level of assessment that may be required to support an application. Landscape sensitivity studies are an early indication of relative sensitivity and should inform the site selection process. They are an additional piece of information for some development sectors or types: for example, for wind farms alongside SNH guidance on Spatial Planning for Onshore wind farms.”	The sensitivity study also offers an early steer to applicants that a location might be more (or less) sensitive than others in the area and provides an indication of potential siting and design considerations.	The sensitivity of a location does not affect ‘the level of assessment’. Specific references to wind energy are not necessary here and appear to encourage the mindset that wind development should continue to be restricted via sensitivity studies.

Para	Wording	Suggested	Rationale
16	Whole paragraph	Landscape sensitivity assessment can inform decisions on where new development, and / or changes in land management, might be most appropriately located from a landscape point of view. Whilst every planning application will need to be judged on its own merits, its suitability may be informed, in part, by an appropriate Landscape sensitivity assessment.	Landscape sensitivity studies are one of the information sources for LVIA, rather than the starting point. The suggested wording provides a more accurate description of the uses of sensitivity assessments and the relationship between LVIA and sensitivity assessments.
2.2.7	Whole paragraph	Suggest deletion	Assessment units should not be 'designed' so that they give the 'right answer' in terms of a sensitivity rating. Some variability is to be expected within character areas and the purpose of the assessment is to identify any variations that arise and guide development and/or land management appropriately. This is better done through description than by subdividing character areas.

3 Theme B – Approach to landscape value

3.1 Introduction

The approach to landscape value is not clearly defined; is disconnected from established best practice and could be better described.

3.2 Comments

It is important that landscape value is considered in sensitivity studies in a manner which is consistent with other work on landscape value, in particular GLVIA3. In the context of the draft guidance, this means that:

- Where local studies have been undertaken to establish landscape value to support local designations, those studies should be used to inform judgements about landscape value in the sensitivity study. This avoids inconsistencies between the two studies.
- The criteria used within sensitivity studies to consider landscape value should be consistent with those used to establish landscape value for LVIA and designation. The SNH 2017 'Draft Guidance on Local Landscape Areas' (especially if finalised), could be a useful cross-reference here. If established value indicators are used, then overlaps between value and susceptibility criteria should be more easily avoided (para. 2.3.9).
- Ratings used for landscape value within a local area must still be scaled to a national context i.e. the highest value should be 'reserved' for nationally valued landscapes. To do otherwise can lead to problems with cross boundary considerations – e.g. if one study attributes 'High' value for its locally valued landscapes, but the adjacent area includes an NSA and so has that area as 'High' value and the locally valued areas as 'Medium'. Given this need for comparable assessments it may be better to use ratings of National, Regional, Community as suggested in GLVIA3 (rather than High/Medium/Low) when considering value. This does not need to match with landscape designations and could for instance identify an area as being regionally important for recreation, with some nationally valued conservation interests, and valued for its scenery at the community level.

Paragraph 2.2.10, Figure 5 and paras. 2.3.7 to 2.3.10 do not match with best practice in considering landscape value. Figure 5 contains a mix of landscape, heritage, recreation, tourism and ecological considerations with no assistance as to how these should be treated. All are potential indicators of landscape value, but designation as an NSA for instance is a far clearer and more reliable indicator than the presence of an SSSI or Listed Building. If it is considered that a list of value indicators may be helpful within this guidance then they should be organised more clearly (such as GLVIA3 box 5.1), and Dark Sky Parks and Discovery Sites could be mentioned as indicators of valued night time environments.

Wild land areas are not a recognised indicator of landscape value (para 2.2.10 and Figure 5). The consensus reached in identifying wild land areas is that they all have a wild character. This is a consensus regarding their perceptual and physical characteristics which could be considered as indicators of value and/or susceptibility – reflecting one of the factors where care needs to be taken to avoid double-counting in sensitivity assessments. Some areas of wild land coincide with national and local landscape designations, which do provide indicators

of value, but others do not coincide with those designations and no inference of value should necessarily be drawn from the consensus that such areas have a wild character.

The examples provided in this section are misleading:

- The presence of a designation covering a small part of a character unit when the rest is undesignated would not necessarily increase its value as suggested at 2.3.7. This would need to be considered in context.
- Core paths should not be treated as an indicator of High value as suggested at 2.3.8. Core paths may indicate local recreational value or may not – for instance if character area only contains one short core path connecting two parts of a village that is not an indication of High landscape value across the character unit.
- The examples in paragraphs 2.3.9 and 2.3.10 do not assist in understanding the preceding text, and their intent is unclear.

4 Theme C – Focus on technical guidance

4.1 Introduction

The guidance provides a mix of advice about the technical requirements for assessment and tips on how to procure and manage the production of an assessment. We suggest that it would be better to focus the guidance on the technical aspects, moving the management advice to an annex, or a revised version of 'A Guide to Commissioning a Landscape Capacity Study Toolkit'.

4.2 Comments

The following paragraphs set out management / commissioning rather than technical guidance and would be best being removed from the main body of the guidance. They could be included in Appendix 3 which contains related advice, or a revised version of 'A Guide to Commissioning a Landscape Capacity Study Toolkit' as discussed in section 6 of this response:

- 1.4
- 1.6
- 1.8
- 1.9 (in part)
- 1.11-1.12
- 2.1.3 (last two sentences)
- 4.5

The following paragraphs set out guidance in relation to technology use rather than 'technical guidance' as to how assessment should be undertaken and presented. It is suggested these references be moved/removed:

- 18 and 3.7 – The use of GIS to support assessment does not cause complexity – that all depends on the way in which it is used. GIS is simply a system for the presentation of geographic information. It can be as simple or as complex as those behind a study choose to make it. It is fair to say that historically some GIS based assessments have been over-complex, but it is not the technology that has dictated that outcome and its use should not be discouraged. It is suggested that the guidance warns against over-complexity, but not against the use of GIS or any other technology/tool that may provide useful innovation. The studies produced by SNH on National Landscape Character, Wild Land and National Scenic Areas are good examples of easily used information, where each area is available as a PDF download accessed from an interactive online map.
- 4.5 - The advice about file splitting for download is unnecessary. Councils will have their own protocols in place regarding the provision of information for accessibility and should follow this.

5 Theme D - Clarity and Tone

5.1 Introduction

The drafting could be improved to remove repetition, grammatical errors or inconsistencies and unclear wording. The guidance also occasionally makes assumptions about the reader's opinions and such assumptions should not form part of best practice guidance.

5.2 Comments

Table 5.1 below suggests potential further revisions to improve clarity and remove repetition. It should be noted the suggested rewording provided in other sections of this document is made in addition and is not repeated here.

Table 5.1 Suggested rewording

Para	Wording	Suggested	Reason
9	"...or consulting a sensitivity study..."	...or consulting on a sensitivity study...	Grammar
11	LCA analyses in detail the three main physical landscape components of landform, land cover; settlement,	LCA is the process of identifying and describing the main elements which result in variation in the character of the landscape. (GLVIA3 Glossary).	LCA considers more than the 3 components listed and not only physical components (e.g. perceptual and aesthetic).
Figure 1	Assess the susceptibility of the landscape and visual baseline to agreed development/land use scenarios	Would benefit from brief introductory paragraph e.g. Figure 1 summarises the key stages of Landscape Sensitivity Assessment Assess the susceptibility of the landscape baseline to agreed development/land use scenarios	Figure 1 not currently referenced in text. Confusion of landscape and visual.
18	"It is difficult to overstate the importance of clear explanations of how the judgements were made in a sensitivity study."	Clear explanations of how the judgements have been made in a sensitivity study should be provided.	Tone and grammar
Fig 3 Stage 2	"Identify key landscape and visual characteristics of potential sensitivity to the scenarios"	Identify key landscape characteristics of potential susceptibility to the scenarios	Confusion of landscape and visual and separate susceptibility and value and the next bullet relates to inclusion of value in the assessment

Para	Wording	Suggested	Reason
	<p>"Identify known values for landscape and visual resource for each assessment unit"</p> <p>"Draft assessment criteria – likely to be for landscape and visual susceptibility and value"</p> <p>This basis for the fieldwork judgements</p>	<p>Identify known values for landscape resource for each assessment unit</p> <p>Define assessment criteria – i.e. elements of the landscape likely to be susceptible to the type of development or management scenario being considered</p> <p>This should form the basis for subsequent fieldwork judgements</p>	<p>Confusion of landscape and visual</p> <p>Wording unclear and confusion of landscape and visual</p> <p>Typo/Grammar</p>
2.1.1	"need stated."	should be stated.	Grammar
2.3.4	It is helpful to have criteria which relate specifically to the likely effects of the development scenarios on the landscape and visual amenity.	It is helpful to have criteria which relate specifically to the likely effects of the development scenario(s) on the landscape.	Confusion of landscape and visual
2.3.6	It is likely that both an assessment of landscape sensitivity and visual sensitivity will be needed.	Omit	Confusion of landscape and visual
2.3.6	"Being visible does not ..."	Potential visibility of the development or change does not ...	Clarity
Figure 5	NWCN	Set out in full	This is not a familiar acronym to all readers.
Figure 3	"...known values"	...recognised indicators of value	Grammar
2.3.7	"... and other recognised values."	... and other indicators of landscape value.	
2.3.8	"Other values...."	Other value indicators ...	
2.3.8	First line	Remove one of the two references to fig 5	Repetition

Para	Wording	Suggested	Reason
2.3.10	“It is important that the whole Steering Group agrees...”	“It is important that the Steering Group agrees...”	How steering groups make decisions is not relevant to the guidance.
3.11	“because everyone needs to agree with the findings”	Omit	
3.1	The purpose of the sensitivity assessment is to carry out an analysis which identifies how each of the criteria, or landscape and visual sensitivities, would be...	The purpose of the sensitivity assessment is to carry out an analysis which identifies how each of the criteria, or landscape sensitivities, would be...	Confusion of landscape and visual
3.13	“They need to be caveated because they cannot be site- or development-specific – that is the role of the LVIA. They also cannot be expected to take into account practicalities - such as land ownership - or go into too much detail.”	Omit	Design and siting advice in the context of a sensitivity study does not need to be caveated, as none of the findings or advice of a sensitivity assessment study should be treated as policy or as a development constraint.
3.15	Whole paragraph	Design advice should take account of relevant national standards and advice, and be up to date - reflecting current industry practice, technology and policy. Within this framework further advice can then be provided - drawing on the sensitivity assessment findings to provide advice specific to the study area and /or assessment units.	See also comments under ‘Theme A’ regarding design advice.
Various	Changes of ‘voice’ – for instance the use of ‘is’ to describe how assessments progress at 3.10 and 3.11; and a less formal tone in general in section 3.	Use ‘should be’ rather than ‘is’. Use a consistent formal tone throughout.	Tone
4.1	“Include caveats ...”	Include advice ...	Tone
4.4	“This will help to avoid users of the documents incorrectly overlooking less sensitive	Omit	An unwarranted assumption.

Para	Wording	Suggested	Reason
	landscapes as places where there are not issues to consider. “		
5.1 to 5.4	All	<p>Rewrite this section to advise periodic review to ensure that studies remain:</p> <ol style="list-style-type: none"> 1) adequately up to date; 2) fit for their intended purpose, and 3) that their purpose remains valid (e.g. aligned with current policy and objectives). 	<p>The section is muddled and the issues that should be of concern are not whether a sensitivity study is being used (para 5.1), or whether development is going where people expected / wanted it to (para 5.3).</p> <p>The three suggested tests will allow for consideration of:</p> <ol style="list-style-type: none"> 1) Changes that might make an assessment out of date (e.g. to the landscape, or to development or land management practices). 2) Whether the assessment meets current recommended practice. 3) Whether the assumptions, context or purpose of the study remain valid. E.g. The declaration of a Climate Emergency by the Scottish Government is a good reason to review older capacity studies that seek to restrict renewables development.
General	Repeated sections	Review carefully to remove unnecessary repetition	Some repetition may be needed for clarity between sections of the document but should not occur unless necessary. Emphasis is not a good reason for repetition.
General	Use of susceptibility / sensitivity	Review carefully to ensure terms are appropriately used throughout.	

6 Theme E – Relationship to other guidance

6.1 Introduction

The relationship of this document to other SNH guidance is unclear. Tensions are created with other guidance and it is critical that these are resolved as part of the publication of this guidance. If they are not, the burden of resolving the differences between the documents is placed onto applicants and decision makers during the determination of development applications.

6.2 Comments

Para. 1 of the draft guidance signals an intention to retain all existing SNH guidance. However, that approach will set up conflicts with some current documents.

There is overlap between this guidance and:

- 'A Guide to Commissioning a Landscape Capacity Study Toolkit' which substantially covers the same ground;
- 'Guidance - Spatial Planning for Onshore Wind Turbines - natural heritage considerations - June 2015', which partly covers this topic in relation to onshore wind development.

The overlap between the draft guidance and the 'toolkit' is substantial. Given that the 'toolkit' retains reference to capacity studies, we consider that it should be superseded or revised. A beneficial approach could be to focus the toolkit onto commissioning and management advice, and the Landscape Sensitivity guidance onto the technical aspects. This would provide greater clarity of purpose for each document and reduce the potential for conflicting advice and terminology.

'Spatial Planning for Onshore Wind Turbines' contains advice regarding capacity studies which should be superseded by this new guidance rather than being retained, although other sections of that document will remain current.

The section of the guidance which covers landscape value (Fig 5 and para 2.3.7 to 2.3.10) could beneficially refer to SNH 2017 'Draft Guidance on Local Landscape Areas' which provides guidance on landscape value criteria. This would reduce the potential for divergence between the criteria used in sensitivity studies and the criteria used to identify valued landscape.