Template last updated: 6 Feb 2024

LOCAL DEVELOPMENT PLAN: SITE ASSESSMENT AND SEA CHECKLIST

Site Name:	**Source of site suggestion:** All landowners/interested parties identified/aware?	**Current site reference**	**Site History/Previous planning applications, existing local plan policies and proposals, historic reference numbers:**
Settlement:	**GIS Site Ref:** **Previous ref:**	**Outside settlement boundary?**	
OS Grid Ref:	**Site Size (ha):**	**Is the site an allocation in the adopted LDP; sites proposed through call for ideas or any other sites with potential?** No Yes ref. Yes but different boundary	**Summary Description (topography, features, boundaries, neighbouring issues, access, exposure, aspect etc.** **Site visit/GIS observations:**
Current Use e.g. is the site brownfield, vacant and derelict land, greenfield, agricultural?	**Proposed Use:**	**Relevant policies/proposals from LDP or NPF4:**	
Insert Location Plan:		**Insert Photographs if available:**	

Topic – water Related SEA topics – population and human health, material assets, climatic factors	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Could the proposal affect the condition of the water environment (water quality, physical condition, water resources, and the migration of wild fish)? See RBMPs for further detail on water condition.	Flood risk and water management Coastal development Blue and green infrastructure					
Could the proposal have a direct impact on the water environment (for example, result in the need for watercourse crossings or a large-scale abstraction or allow the de-culverting of a watercourse?	Flood risk and water management Coastal development Blue and green infrastructure					
Can the proposal connect to the public foul sewer?	Infrastructure first					
Can the proposal connect to the public water mains? If not, is there a sustainable water source that is resilient to the periods of water scarcity?	Flood risk and water management Infrastructure first					
Are there wetlands or boggy areas on the site?	Flood risk and water management					

For large scale developments, are there any private or public water supplies within 250m of the site which may be affected?	Infrastructure first					
Flood Risk **Relative to the floodplain, as defined in NPF4 could the proposal be at risk of flooding (from any source) or result in additional flood risk elsewhere? If flood risk is not fully understood, a Flood Risk Assessment (FRA) should be undertaken. Specify which of the following flood sources are applicable: fluvial, pluvial, sewer, groundwater or coastal.**	Flood Risk and Water Management Coastal development					
Could the development of the site help alleviate any existing flooding problems in the area?	Flood risk and Water management					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors…	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
To what extent will the proposal conserve, restore and enhance biodiversity?	Biodiversity Natural Places					
To what extent will the proposal facilitate the creation of nature networks and improve ecological connectivity?	Natural places Biodiversity					
International Designations - SAC/SPA, Ramsar, World Heritage Sites. To what extent will the proposal affect these sites including via connectivity?	Natural places Biodiversity					
National Designations To what extent will the proposal affect national designations – e.g. SSSI, NNR	Natural places biodiversity					
To what extent will the proposal affect other designations - and locally important designations such as LNRs.	Natural places Biodiversity					
To what extent will the proposal affect Non designated – e.g. trees, TPOs, hedges, woodland, (including woodlands in the Ancient , Semi Natural and Long Established Plantation Woodlands), species rich grasslands	Natural places Biodiversity					

Protected Species–e.g. bats, otters, etc - can it be ascertained if protected species will be affected and will a site survey be required?	Natural places Biodiversity					
To what extent will local geodiversity sites or wider geodiversity interests that could be affected by the proposal?	Soils Natural place Biodiversity					
How will habitat connectivity or wildlife corridors be affected by the proposal – will it result in habitat fragmentation or greater connectivity?	Biodiversity Tackling the climate and nature crisis Forestry, trees and woodland.					

Topic – Climatic Factors Related SEA topics – population, human health, water, biodiversity, material assets, soils, air, cultural heritage, landscape	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
To what extent will the proposal involve sediment extraction/reclamation or changes in coastal processes that could result in coastal flooding?	Climate mitigation and adaptation Coastal development					
To what extent will the proposal promote and enable adaptation to climate change?	Climate mitigation and adaptation					
To what extent does the proposal use nature based solutions for climate change mitigation and adaptation?	Climate mitigation and adaptation Infrastructure First Blue and Green infrastructure					
To what extent does the proposal maintain and enhance resilience of existing and planned grey and green infrastructure?	Climate mitigation and adaptation Infrastructure first Blue and Green infrastructure					
To what extent does the proposal have good proximity to services and good access to existing or proposed public transport and active travel network?	Climate mitigation and adaptation Infrastructure First.					

Topic – Air Quality Related SEA topics – climatic factors, soils, population and human health	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Could the proposal lead to Local Air Quality Management thresholds being breached in an existing Air Quality Management Area?	Climate mitigation and adaptation Health and Safety					
Could the proposal lead to the designation of a new Air Quality Management Area (AQMA)	Health and safety					
Does the proposal introduce a new potentially significant air emission to the area (e.g. combined heat and power, an industrial process, large scale quarry etc.)?	Health and safety					
Will the proposal lead to a sensitive use being located close to a site with noise/odour issues or a site regulated for emissions to air by SEPA (e.g. new housing adjacent to a large manufacturing factory)	Health and safety					

Topic – population and human health Related SEA topics – climatic factors, air, water, soils, material assets	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Is the proposal within the vicinity of a major accident hazard site or major accident hazard pipeline?	Health and safety					
Will the proposal affect service infrastructure: Education capacity - Secondary School Catchment Area/ Primary school catchment area Health provision/GP capacity						
To what extent will the proposal affect the quality and quantity of open space and connectivity and accessibility to open space or result in a loss of open space?	Design, Quality and place local living and 20 min neighbourhoods Blue and green infrastructure Play, recreation and sport					
To what extent will the proposal affect core path links or other key access networks such as cycle paths, coastal paths and rights of way?	Sustainable Transport Design, quality and place Local living and 20 minute neighbourhoods Infrastructure first??					

Will the proposal have the opportunity to incorporate new or enhance existing blue and/or green infrastructure providing multiple benefits such as enhanced biodiversity, management of surface water?	Blue and Green infrastructure Infrastructure First					

Topic – Soils Related SEA topics – landscape, cultural heritage, water, biodiversity, flora and fauna, material assets.	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Does the proposal make use of a brownfield site or contaminated and vacant and derelict land? If on brownfield, is the site naturalised?	Soils Brownfield, vacant and derelict land					
Are there any contaminated soils issues on the site and if so, will the option employ remedial actions to ensure the site is suitable for use (as defined in PAN 33)?	Soils					
Is the proposal on peat or carbon rich soils and could the development of the site lead to a loss of peat or carbon rich soils?	Soils Climate mitigation and adaptation					
Does the proposal result in the loss of prime agricultural land or land that is culturally or locally important for primary use as identified by the LDP?	Soils					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
National landscape designated sites To what extent will any designated sites be affected – including NSAs, Regional Scenic Areas, and local landscape designations?	Natural Places					
Regional and local landscape designated sites To what extent will any designated sites be affected – Regional Scenic Areas, and local landscape designations?	Natural Places					
Non designated landscape features and key landscape interests Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it? Such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities?	Natural Places					
To what extent will the proposal affect features of landscape interest, including the distinctive character of the landscape	Natural places					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
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Non designated landscape features and key landscape interests Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it? Such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities?	Natural Places					
and the qualities of wild land?						

Topic – Cultural Heritage Related SEA topics – Climatic factors, air, water, soils, material assets, biodiversity, landscape	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Does the proposal protect or enhance the site or setting of: • World Heritage Sites* • Scheduled Monuments • Listed buildings • Inventory battlefields • Inventory gardens and designed landscapes • Conservation Areas • Undesignated historic environment assets • Streetscapes and settlement patterns monuments	Historic assets and places Natural Places					

Does the proposal promote or enable the retention, maintenance and sustainable use or re-use of historic buildings and infrastructure?	Historic assets and places Zero waste Infrastructure first Brownfield, vacant and derelict land and empty buildings City, town, local and commercial centres Rural development					

Does the proposal: Support the repair and appropriate retrofit of historic buildings? Support the transition to green energy supply in historic buildings? Include adaptation measures to make the historic environment assets and places more resilient to the effects of climate change (e.g. coastal erosion, flooding etc)?	Historic assets and places Tackling the climate and nature crises Climate mitigation and adaptation Design, quality and place Infrastructure first Quality homes Flood risk and water management Rural homes					

Does the proposal: Enable the historic environment to support creation of high-quality places and spaces? Promote sustainable, responsible tourism, recreation and cultural activity?	Tourism Culture and creativity Design, quality and place Play, recreation and sport Local Living and 20 minute neighbourhoods					

Topic – Material Assets – Deliverability/ sustainability constraints Related SEA topics – climatic factors, air, water, soils, population and human health.	**NPF4 Policy Topic**	**Scoring pre-mitigation**	**Mitigation**	**Enhancement**	**Scoring post-mitigation**	**Comments/conclusions**
Will the site be delivered within the LDP timeframe? Other site servicing constraints, e.g. electricity pylons, underground gas pipelines etc.						
Site aspect – does the site make best use of solar gain? Is the site protected from prevailing winds?	Design Quality and place Climate Mitigation and Adaptation Heat and Cooling					
Is the site in an area of heat network potential or a designated Heat Network Zone (HNZ)?	Climate Mitigation and adaptation Heat and cooling					
Vehicular Access constraints or opportunities - Is the network capable of accommodating active travel, public transport, other shared modes, and private vehicle traffic generated?	local living and 20 min neighbourhoods Sustainable transport					

Is the site close to a range of facilities? Can these be accessed by public transport or active travel?	local living and 20 min neighbourhoods Sustainable transport City, town, local and commercial centres					
Does the proposal minimise demand for primary resources by reusing an existing building?	Zero waste					
For waste infrastructure and facilities (except landfill and EFW) does the proposal comply with the criteria listed in NPF4 policy 12 d)?	Zero waste					

Other Considerations

Please note any other issues which may be relevant to the assessment of the candidate site. For example:

- Any restrictive covenants relating to the use of the land/ buildings contained within the proposed candidate site?
- Is the candidate site on Common Good Land?
- Is there a requirement to prepare place-based development briefs or masterplans?

Scoring – two columns have been added in the event that is it useful for planning authorities to quickly identify environmental effects from a proposal on a site. Where adverse effects have been identified, it may then also be useful to consider any obvious mitigation measures that might reduce these adverse effects. The second scoring column then allows at a quick glance to see what residual effects might remain following mitigation. There are many scoring techniques currently in use and an example of one option could be:

++	+	0	-	--
Significantly positive	positive	neutral	adverse	Significantly adverse

Explanation of the key SEA topics (please note the SEA objectives are suggested examples only)

Water

SEA objective – To protect and enhance the ecological status of the water environment

Water Drainage Constraints

The Water Framework Directive (2000/60/EC) has the overall objective of ensuring that all inland and coastal waters within defined river basin districts reach at least good status by 2027. Achieving this requires measures to be put in place and action to be taken to i) prevent deterioration and ii) promote improvements in the water environment.

Information on the current status of a water body, pressures affecting it, measures required to address those pressures, and deadlines for achieving those measures can be extracted from SEPA's water environment hub. This tool should be used to identify existing pressures on water bodies and the site assessment should identify whether or not policies and proposals are likely to exacerbate existing pressures, create new problems and offer opportunities for enhancement. For example, if there are already morphological pressures on a water body then further engineering could trigger a further downgrade. Control of non-native invasive bank-side / in-stream plant species is an example of enhancement where an invasive non-native species pressure has been identified for a water body.

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Groundwater Dependent Terrestrial Ecosystems (GWDTEs)

GWDTEs are types of wetland which are specifically protected under the Water Framework Directive. SEPA holds a list of GWDTEs within all designated sites (SSSIs, SPAs, and SACs). To identify non-designated GWDTEs a habitat survey (Phase 1) would be required. At the site assessment stage we do not require a Phase 1 Habitat Survey, but we do require information on location of wetlands and boggy areas. This information can be collected by looking for the boggy ground symbol on GIS and / or a site visit.

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Flood Risk

Development plan preparation should be informed by a Strategic Flood Risk Assessment (SFRA). Scottish Government's Development Planning Guidance states that SFRAs are designed to inform the development planning process, primarily to avoid increasing overall flood risk by avoiding areas of flood hazard. The SFRA can be used as a screening tool to identify whether flood risk is fully understood at site assessment stage, and therefore whether further detailed site-level Flood Risk Assessment is required prior to a site being included in the Proposed Plan, to ensure that only sites that are in accordance with NPF4 are allocated SEPA has produced Strategic Flood Risk Assessment Guidance which explains how this assessment can be carried out.

For SEA purposes if flood risk is found to be an issue, mitigation could be the removal of the site (or part thereof found to be at risk) from allocation.

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SEA guidance on water provides advice on how to take water into account in SEA.

Biodiversity, Flora and Fauna

SEA objective – Protect and enhance designated wildlife sites, wider biodiversity interests, valuable habitats and protected species, avoiding irreversible losses

International Designations

If there is a likely significant effect then it is important to state why and what site may be affected (including Ramsar sites). The information gathered for this Site Assessment will help inform the 'screening' stage of the HRA – i.e. identify likely significant effects on a Natura site. **Policies or proposals likely to affect a Natura site should be flagged up for assessment in terms of the Habitats Regulations Appraisal.** Guidance on where designated sites are and what their qualifying interests relate to can be found on NatureScot's website Sitelink - https://sitelink.nature.scot/home. In addition, the majority of Natura sites are underpinned by Sites of Special Scientific Interest (SSSIs). SSSIs all have a site management statement which provides useful information on site condition and management pressures and will help to establish what is important and why and therefore help identify likely significant effects.

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National designated sites

Again, see the above comments regarding site management statements for Site of Special Scientific Interest (SSSIs). National Nature Reserves (NNRs) are examples of the best wildlife sites in Scotland. These are managed for wildlife but also allowing for enjoyment by public. Guidance on NNRs can be found at: www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/national-designations/national-nature-reserves

Other Designated Sites

Local Nature Reserves (LNR) are locally important for natural heritage, designated and managed by local authorities to give people better opportunities to learn about and enjoy nature close to where they live. Similarly Local Nature Conservation Areas flag-up to planners and developers where there are natural feature of some merit. In this way it gives planners and developers early indication of sensitive sites and opportunities for enhancing the local environment. The local Biodiversity Officer should be able to provide advice here.

Non designated features and key wildlife habitats

- trees and woodland, including ancient and semi- natural inventory sites
- species rich grassland, moorland, heathland, wetlands and watercourses including burns

Links to Ancient Woodland Inventory (within SNHi) and the Forestry Commission's Native Woodland Survey of Scotland are detailed below.

www.nature.scot/doc/guide-understanding-scottish-ancient-woodland-inventory-awi

http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/native-woodland-survey-of-scotland-nwss

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Protected Species
Although protected areas can safeguard species within their boundaries, some animals and plants are so threatened or vulnerable that they need legal protection wherever they occur. For further information on Protected species click here.

Local Geodiversity sites
These sites provide examples of geology and geomorphology of regional and local importance, where the geodiversity resource can be conserved, so that people can enjoy and find out more about it. These sites can contribute to the quality of local environments and provide opportunities for recreation and informal education.

Geological Conservation Review sites come from an assessment of nationally and internationally important sites for geology and geomorphology. The site boundaries for these and un-notified GCR sites are available through SNHi: www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/local-designations/geological-conservation-review-sites

Local geodiversity sites are selected by voluntary geoconservation bodies such as local Geodiversity groups and Regionally Important Geological / Geomorphological Sites (RIGS) groups. Geology and other natural history enthusiasts, wildlife trusts, museums, geological societies, teachers, planners and site owner, participate in the running of RIGS groups. More information on RIGS.

Nature Networks
A Nature Network connects nature-rich sites, restoration areas, and other environmental projects through a series of areas of suitable habitat, habitat corridors and stepping-stones. As well as supporting regional and national approaches to protect and restore nature, they provide local benefits to wildlife and people.

Connectivity is an essential part of nature. It is necessary for functioning and healthy ecosystems, key for the survival of animal and plant species, and is crucial to ensuring genetic diversity and adaptation to pressures such as climate change.

To ensure Scotland's nature can thrive, nature-rich areas must be connected through a series of networks linking them all together.

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Air Quality
SEA objective – To improve or avoid adverse impacts to air quality and reduce emissions of key pollutants.

The impact of allocations on local Air Quality Management thresholds should be considered. For example, where an area is already close to exceeding air quality objectives, where an area is at risk of becoming an AQMA, or where sensitive development such as a hospital or residential use is proposed close to a busy road or a site regulated for emissions to air by SEPA. Such allocations may lead to an increase in the exposure of people to poor air quality.

SEA guidance on air provides advice on how to take air into account in SEA.
http://www.sepa.org.uk/media/147606/advice-for-responsible-authorities-on-sea.pdf
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Population and Human Health

SEA Objective – To protect and enhance quality of life including maintaining and improving opportunities to access public open space and the natural and historic environment

Our surroundings are a key factor in determining our health and sense of well-being. Development plans set the context for clear development management decisions which will help deliver high quality green networks and protect and enhance natural heritage assets. Green Networks in Development Planning explains the background to green networks, their multi-functionality and provides development planning advice in respect of green networks. Planning authorities should also seek to prevent further fragmentation or isolation of habitats and identify opportunities to restore links which have been broken; Integrated Habitat Networks can be used here alongside green networks to ensure local biodiversity is maintained and enhanced

Human health can be affected by environmental factors which include pollution (e.g. emissions to air, soil or water from industrial processes including energy and waste management), flooding and climate change. Consideration of these issues, particularly in relation to location of sensitive development types, in site assessment will help to ensure that human health and wellbeing are integral to the plan.

http://www.sepa.org.uk/environment/land/planning/strategic-environmental-assessment

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Soil

SEA objective – To maintain or improve soil quality, quantity and function and prevent any further degradation of soils
To protect carbon rich soils and restore peatlands

Soils provide the following seven key functions:

- providing the basis for food and biomass production
- controlling and regulating environmental interactions (regulating water flow & quality)
- storing carbon and maintaining the balance of gases in the air
- providing valued habitats and sustaining biodiversity
- providing a platform for buildings and roads
- providing raw material
- preserving cultural and archaeological heritage

The assessment should consider the impacts of development on the relevant soil functions for the site. SEPA provides information on regulations that apply to soil and good practice guidance which is available at www.sepa.org.uk/environment/land/soil.

The Scottish Soil Framework provides a general framework to promote the sustainable, management and protection of soil consistent with the economic, social and environmental needs of Scotland. SEA guidance on soil provides advice on how to take soil into account in SEA.

http://www.sepa.org.uk/media/147606/advice-for-responsible-authorities-on-sea.pdf

The James Hutton Institute (formerly Macaulay) provides information on soil maps which are available from Scotland's Soils website.

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Landscape

SEA objective – conserve and enhance landscape character and scenic value of the area and protect and enhance designated landscape areas

Designated Landscapes

Our fine scenery provides an inspiring backdrop for all who live in Scotland. Images of our unspoilt landscape also helps to market our tourism and film industries and world-renowned products such as whisky.

Our finest landscapes have been designated as either National Scenic Areas or National Parks. These include some of Scotland's most famous areas, from the Cuillin Hills to the Cairngorms.

Non-Designated Landscapes

High quality landscapes encourage us to venture into the outdoors. Having greenspace in our towns and cities, and easy access to our surrounding landscapes, brings vital benefits to our health and well-being.

Each part of Scotland has a distinctive character, which helps to build our sense of place – both in our own localities and as a nation. Together, our diverse landscapes and townscapes provide a living canvas of Scotland's history, reflecting ways of life and traditions deeply engrained in our culture. Some landscapes are valued for their wild land quality.

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Climatic Factors – Climate Change Mitigation

SEA objective – To reduce greenhouse gas emissions and increase resilience to the consequences of climate change

The Scottish Government's guidance Consideration of Climatic Factors within Strategic Environmental Assessment (SEA) provides useful guidance on how to determine whether a PPS is likely to have significant environmental effects.

https://www.sepa.org.uk/environment/water/river-basin-management-planning/

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Material Assets – Waste

SEA objective – To reduce waste and promote the sustainable use of resources

The Scottish Government's Zero Waste Plan sets out a vision of a zero waste Scotland where waste is treated as a valuable resource and not as a burden.

For allocations for the location of waste management facilities consideration should be given to the potential for adverse impacts which may arise from locating other new development in the vicinity of proposed / existing waste sites and on the potential risk the proposal would pose to people or property. The local authority Environmental Health department is best placed to advise on site specific considerations.

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Cultural Heritage (including the historic environment)

SEA Objective – To protect and promote the historic environment

SEA Sub Objectives:

- To protect and enhance historic environment assets and their settings
- To promote and enable the retention of historic environment assets
- To make the historic environment more climate resilient and to reduce emissions from the historic environment
- To promote and enable access, understanding and enjoyment of the historic environment

Settlement level:
Consideration should be given to the likely implications and opportunities for the historic environment arising from the spatial strategy. This will involve considering the likely significant effects for historic environment assets (and their settings), and places.

Strategic considerations:
Our historic environment is not only a finite resource that requires protection but one that also delivers the places and spaces that are key to our everyday lives, cultural identity and sense of place. Our historic built environment provides us with much of our housing stock, offices, infrastructure, public buildings and parks and gardens and therefore our use, maintenance and adaption of these assets is key to a sustainable future and our health and wellbeing.

Scotland's new strategy for the historic environment Our Past, Our Future (OPOF) was published in April 2023. The strategy sets the direction of travel for the historic environment sector and identifies the priority areas of action to focus work to support this mission. The 3 priorities are *Delivering the transition to net zero, Empowering resilient and inclusive communities and places* and *Building a wellbeing economy*. The importance of the contribution that the maintenance, reuse and adaptation of our historic environment can make in preventing waste and reducing carbon emissions is recognised under the transition to net zero priority.

Scotland's current landscape is the product of natural processes and human activity operating over many centuries, and both natural and historic aspects should be considered when developing policies and proposals at the landscape scale. Proposals should protect and promote the overarching importance of the historic environment to a sense of place. They should take account of the capacity of settlements and surrounding areas to accommodate development without damage to their cultural and historic significance. This reflects the policies contained within both the National Planning Framework and The Historic Environment Policy for Scotland (HEPS). HEPS is a policy statement for decision making for the whole of the historic environment for use at all levels. All the policies and principles in HEPS are likely to be relevant to strategic decisions around the allocation of land depending on context, with HEP2, HEP4 and HEP5 highlighting the importance of sustainable decision making and planning for the future use of historic assets and places.

Historic Environment Scotland's Portal holds locational information on national designations (including downloadable datasets) including designation records, scheduled monument consents and decisions. The relevant council area Historic Environment Records will also be a key resource for information on historic environment baseline including for non-designated assets.

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