

Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	HWLDP-MIR-285
Organisation/Individual:	Scottish Wildlife Trust (Dr Maggie Keegan)

Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (Please Specify)	

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	x
Inverness and A96	x
The A96 Corridor	x
Phasing of Development	
Developer Contributions	x
East Inverness	x
Nairn	
Tornagrain	x
Smaller Settlements in A96	
Caithness and North Sutherland	x
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	x
Population and Housing	x
Housing in the Countryside	x
Affordable Housing	x
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	x
Developer Contributions	x
Natural, Built and Cultural Heritage	x

Previously used Land	
Wild Land	x
Water Environment	x
Renewable Energy	x
Flooding	x
Waste Management	x
Air Quality	x
Sustainable Design	x
Business and Industrial Land	x
Accessibility and Transport	x
Agricultural Land	x
Subdivision of Existing Crofts	x
Allocation of Inbye Land	x
New Crofting Township	x
Small Scale New Crofts	x
Coastal Development	x
Forestry and Woodland	
Minerals	
Open Space and Physical Activity	
Access to the Outdoors	
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

<p>Vision for Highland should recognise synergy with environment</p> <p>Support regeneration of brownfield sites in Inverness however, could use green sites more effectively for recreation</p> <p>Habitats network plan for the A96 is essential</p> <p>If developer contributions are the way forward, then masterplanning should be used</p> <p>Sustainable transport infrastructure should be in place prior to development</p> <p>Tornagrain must be climate change proofed</p> <p>Support for marine energy must not compromise the health of the marine/coastal environment</p> <p>There should be sustainable growth of fragile areas not just economic growth</p> <p>Low integration strategy should be adopted</p> <p>Oppose development outwith settlements</p> <p>Do not agree with reduction in affordable housing from 10 to 4</p> <p>Developer contributions should include green infrastructure</p> <p>More detail is needed on approach to natural, built and cultural heritage</p> <p>Reference to sustainable flood risk management is needed</p> <p>Sustainable design should be set in context of Climate Change (Scotland) Act 2009</p> <p>Tourism is dependant on high quality environment which is species rich</p> <p>Crofters should apply to Crofters Commission to build on land of no crofting reason than planning permission refusal</p>
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Should state benefits of green networks

Action Sheet Completed by:	SH
Date:	14/12/09

Dawn Sutherland

From: Malcolm MacLeod - Planning
Sent: 11 November 2009 15:04
To: Dawn Sutherland
Subject: FW: MIR

dawn
pl ack

From: Maggie Keegan |
Sent: Wed 11/11/2009 15:00
To: Malcolm MacLeod - Planning
Subject: MIR

Dear Malcolm,
many thanks for the extension to the MIR. Here is SWT's response. I am also enclosing a briefing note on delivery of the biodiversity duty which I sent to all planning authorities last month. Apologies if you have already seen it. If you would like to discuss any of the comments SWT have made, please get in touch.
Regards,
Maggie Keegan

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Guidance for planning authorities on implementing the Biodiversity Duty

Planning authorities are required to implement the Biodiversity Duty in development planning and management. The Scottish Wildlife Trust has produced this guidance on the five first steps local authorities should take to fulfil the Biodiversity Duty

Background

The Nature Conservation (Scotland) Act 2004 places the following duty on every public body and office-holder:

S1 (1) It is the duty of every public body and office-holder, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions.

Biodiversity is a core component of sustainable development and can make a significant contribution to the Scottish Government's central purpose of sustainable economic growth.

Conserving biodiversity is not only vital in Scotland's response to tackling climate change but also provides ecosystems services which have substantial benefits underpinning Scotland's social, economic and cultural wellbeing.

Actions

1. Local Biodiversity Action Plans (LBAPs)

LBAPs are key strategies dedicated to the delivery of biodiversity conservation at the local level.

Development plans should list locally important habitats and species and development management should ensure that LBAP species and habitats are protected from inappropriate development.

2. Local Nature Conservation Sites (LNCS)

LNCS provide important wildlife refuges and act as stepping stones in the local green network.

Designating LNCS helps local authorities identify and prioritise actions for habitats and species (i.e. those listed in local and UK Biodiversity Action Plans).

LNCS should be identified using published guidance and incorporated in the development plan. Their boundaries should be marked on policy maps to ensure their protection from inappropriate development, damaging operations or other impacts.

3. Green networks

Green networks are connected systems of land and water in which biodiversity is given special consideration.

As well as connecting people with nature and providing a more permeable landscape for wildlife to move and migrate (supporting adaptation to climate change), green networks have the added benefits of:

- Making the local environment a more attractive place to work and live
- Helping to maintain an ecologically healthy landscape which is essential to the local economy
- Acting as carbon sinks

4. Supporting local record centres (LRCs)

Biological data is a valuable resource which is essential for decision making. It is Government policy that: *the best new and existing knowledge on biodiversity is available to all policy makers and practitioners.*"

Planning authorities should support and actively engage with local record centres. LRCs can speed up the planning process by:

- Identifying local biodiversity hotspots
- Identifying local nature conservation sites
- Providing data to local authorities (using an appropriate model) to enhance functional green networks
- Providing a planning screening service

5. Education and public understanding

Planning authorities should provide biodiversity advice to land owners and managers in relation to planning and the protection of designated sites. Biodiversity supplementary guidance will assist developers to give due consideration to the biodiversity objectives of the local authority.

Local authority managed sites and other areas of open space can be used to promote learning and increase awareness of wildlife among local people.

Education of school children raises awareness of biodiversity and indirectly targets a much wider audience through families and friends. As the curriculum for excellence promotes outdoor learning, primary and secondary schools should be encouraged to use their local sites to learn about biodiversity.

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Malcolm MacLeod
Development Plans Manager
Glenurquhart Road
Inverness
IV3 5NX



11 November 2009

Dear Mr MacLeod,

Re: HIGHLAND WIDE LOCAL DEVELOPMENT PLAN- MAIN ISSUES REPORT

Scottish Wildlife Trust (SWT)¹ welcomes the opportunity to comment on the Highland Wide LDP MIR.

SWT believe that inappropriately located and badly designed developments have significant, detrimental impacts on Scotland's biodiversity and on people's quality of life. The planning system should act as a guardian for biodiversity and actively support and promote its conservation, enhancement, restoration and expansion. In addition, the planning system should be a strategic and spatially-based process which identifies and protects biodiversity at multiple scales, encompassing; species, habitats, wildlife networks (e.g. green ecological networks) and regional-scale ecosystems.

After reading the MIR carefully, we have serious concerns regarding the message this document is sending out regarding development in the Highlands.

KEY MESSAGE

We believe that giving due consideration to natural heritage, climate change, the principles of sustainable development and adopting a landscape-scale conservation approach to planning is vital to ensure that all future development in the Highlands is of the right type and in the right place.

As such, SWT urge Highland Council to take note of our comments which we believe, if acted upon, will help ensure that development in the Highlands is beneficial to people and adds value to local wildlife.

SPECIFIC POINTS

3. The Vision for the Highlands

We are concerned that the Councils overarching objectives for the Highlands (as stated on page 4) appear to be at odds with the fundamental principles of sustainable development which are: *the integration of economic, social and environmental objectives*. **We note the environment is not mentioned at all in the 'vision'**. This is a serious omission. Surely, population growth and economic development must take place whilst *respecting environmental limits*.

As well as having built a fairer and healthier Highlands (as stated in the vision) the goal must be for the Highlands to be **greener**. Highland Council should recognise the synergies between protecting the environment and increasing people's well being, whilst at the same time creating a place that people want to do business. Thus

¹ The Scottish Wildlife Trust was founded in 1964 to take all appropriate measures to conserve the fauna, flora and all objects of natural history in trust throughout Scotland. With 30,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 124 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

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making the Highlands 'greener' will add value by making the Highlands healthier and wealthier whilst at the same time contributing to safer and stronger communities.

Safeguarding our environment

Bullet point 1 should state: To ensure development of renewable energy resources are managed effectively '**and in an environmentally sustainable manner**' with clear guidance on where renewable energy development should be located '**to ensure minimal adverse environmental impact**'

Bullet point 2 should state: To make sure the quality...enhanced, '**in line with Scotland's biodiversity commitments**'

Bullet point 3: CO₂ should be replaced by **greenhouse** gases

A healthier Highlands

It could be stated that people who have access to local green space are more likely to adopt healthier lifestyles. E.g. People who live within 500 m of accessible green space are 24 % more likely to meet recommended levels of physical activity. Reducing the sedentary population by just 1 % would reduce morbidity and mortality rates valued at £1.44 billion for the UK².

4. The Spatial Strategy

General points

From the outset, it should be recognised that all development should be designed along sustainable transport and energy efficient house design principles (i.e. climate change proofed). At the same time, development design and layout should retain and enhance local biodiversity hotspots and contribute to the local green networks (where appropriate). Such an approach would help mitigate the causes of climate change as well as providing adaptation measures.

To help tackle climate change and improve people's quality of life, SWT recommends that Highland Council produce a sustainable transport strategy.

Where it states: *Because of the changes in the city, there are other issues that need to be addressed, particularly in terms of improving accessibility and transport etc.*, reference to an **integrated and sustainable transport system** should be included.

Inverness and the A96 Corridor

Whilst we broadly welcome the proposal to use brownfield sites, we do have concerns over the development of green sites such as the Longman refuse tip. While the presence of potentially toxic material makes this less than ideal for development, some long-established wildlife habitat exists here, making this a very suitable site for a country park, thereby ensuring that some green space is retained in this area. **This accessible area presents an opportunity for Inverness, a coastal town lacking coastal access, to develop a highly attractive sea front wildlife and amenity area close to the city.**

The A96 corridor is the logical area to focus development. **However, sustainable infrastructure needs to be in place prior to this.** An essential part of preferred option 1 is the development of a **green space policy** and plan that includes **wildlife habitat networks**. In this area, which supports important areas of wildlife habitat, a **habitat networks plan** is also essential prior to any detailed development planning. The Masterplan³ should identify locally sensitive environmental characteristics of the site and ensure that connectivities are maintained or enhanced.

The developer contributions protocol should be extended to include this (but see comments below). Green space, open space, wildlife habitat networks (which is made up of local/national/regional biodiversity 'hotspots' and are connected by a green network) connect people to nature, can form part of a sustainable transport system and allow wildlife to move and migrate in response to climate change (in effect green habitat networks are an adaptation mechanism).

² www.naturalengland.org.uk/Images/nochargev2_tcm6-14259.pdf

³ See PAN Master Plan (2008)

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The dispersed growth option is favoured as it provides sustainable transport (e.g. rail links and park and ride)

Developer Contributions

We are not convinced that a 'developer-led plan', as opposed to a strategy/plan would accord to a sustainable, long-term strategy for the area that protects its natural amenity and the qualities that attract people to the Highlands. If developer contributions were to be the way forward, masterplanning would be essential (see above).

Area specific issues

East Inverness

The infrastructure to support this development is definitely not there. We would recommend that the infrastructure, which should support the principles of sustainable development and include provision of a sustainable transport system, should be in place **before** the major phases of development are completed.

In the purple box it states: *identify how these development priorities can assist in delivering improvements to open space provision, transport improvements (for example the A96-A9 link, park and ride facilities or better provision of walking and cycling networks in the area.*

The MIR should also state that development priorities can assist in improvements to green space and green networks and should incorporate local biodiversity hotspots into development design where appropriate.

Q4- We agree with the preferred option but see caveats above.

Tornagrain

The new settlement proposal must be climate change 'proofed'. There is a great opportunity here to produce affordable housing that is both sustainable and eco-friendly. Reference to tackling the effects of climate change and producing energy efficient housing should be included. Development should proceed along these lines. Otherwise Highland Council is ignoring the climate change duty⁴ which states that: *A public body must, in exercising its functions, act—*

- (a) in the way best calculated to contribute to the delivery of the [greenhouse gas reduction] targets set in or under Part 1 of this Act;*
- (b) in the way best calculated to help deliver any programme laid before the Scottish Parliament under section 45;*
- (c) in a way that it considers is most sustainable.*

Caithness and North Sutherland

Bullet point 4 states: to make sure that proposals for marine renewables related development are supported

SWT believe that support for marine renewables must not be allowed to compromise the health of the coastal and marine environment and the other important services they provide. While the Scottish Wildlife Trust supports action to mitigate climate change through marine renewable developments, it agrees with the widely-held view that healthy, well-functioning marine and coastal ecosystems, habitats and species will be better able to adapt to pressures such as climate change. A healthy marine environment provides a vital carbon sink, as well as providing essential goods and services, including fisheries and other food production, nutrient cycling and climate regulation. **Marine renewable energy developments should not, therefore, compromise the health of the marine environment or the adjoining coastal environment.**

Location of marine renewables should take place as part of the marine planning system to be introduced by the Marine (Scotland) Act in 2010. SWT supports the following principles for a sustainable Scottish marine renewables industry that allows the coasts and seas to continue to provide other essential benefits to Scotland's people.

- Marine renewable energy production should not reduce current or future natural capacity for carbon storage and sequestration (e.g. in organic sediments or shallow seas) nor should it result in a net increase in carbon emissions
- Best use should be made of marine renewables technology to minimise ecological footprint

⁴ See Section 36 of Climate Change (Scotland) Act 2009

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- Marine renewable energy developments should, both at individual development scale and in combination with other prevailing factors, maintain ecosystem integrity and allow ecological processes to operate on a landscape-scale
- Marine renewable energy developments should comply fully with the EU Habitats Directive and should not, either at individual development scale or in combination with other prevailing factors, damage or destroy existing wildlife sites of local, national or international importance
- Marine renewable energy developments should, where possible, enhance existing natural habitats and improve ecosystem connectivity

On page 29, in purple box, there should be emphasis placed on the vital economic importance of tourism. **It should also be recognised that tourism depends on high quality landscape and biodiversity value being maintained in the Highlands.**

First bullet point should refer to **sustainable** development not just development of the Highlands.

Wider countryside and fragile areas

SWT welcomes a move towards consistency in planning for development in the wider countryside. However, with a lack of access to essential biological data and the employment of at least one full-time ecologist to gather and interpret the data, it is difficult to see how Highland Council can achieve the necessary standards.

Paragraph 2 should refer to **sustainable** economic growth not just economic growth. Sustainable economic growth is the central purpose of the Scottish Government. As stated in the consultation draft SPP, sustainable economic growth has an environmental element such that the **limits of the environment are respected** in order to ensure that future generations can enjoy a better quality of life.

All planned development should be carried out **sustainably**. Reference to the five guiding principles of sustainable development⁵ is essential.

5. Policy Options for the Highland wide Local Development Plan

Population and housing

The table on page 34 shows the population projections with different migration scenarios. SWT would advise caution regarding the population estimates calculated according to high migration scenario. This could lead to developer-led ghost towns - some areas already have these due to the current economic crisis. A more flexible and adaptive approach should be taken. Therefore we do not agree with the preferred option in the purple box on page 35, which would respond to the highest rate of population growth.

Housing in the countryside

SWT opposes housing development in the countryside unless it is around established villages – infrastructure and servicing costs are high, therefore environmental costs and loss of environmental quality are a significant risk. As such we prefer Alternative Option 1 (Question 13).

Affordable housing

We do not agree that there should be a reduction in affordable housing from ten to four. We do not want to see a developer-led process emerging. There should also be support for encouraging conversion of existing properties in an environmentally friendly way.

Retailing

We would be in favour of a strategic approach to shopping development rather than developer-led competition. Therefore we agree with the preferred option (Q 17).

Developer contributions

⁵ See: Choosing our future: Scotland's sustainable development strategy (Scottish Executive 2005)

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First paragraph should include **green infrastructure**.

Third paragraph mentions sustainable economic growth- this has not been referred to at all previous to this and therefore the report lacks consistency.

Fourth paragraph: Offset impacts should include environmental impacts.

Developer's contributions will also be necessary for the maintenance of green infrastructure- unless Highland Council is going to take on this responsibility once development is completed.

Safeguarding our environment

Natural built and cultural inheritance

We are particularly disappointed with this section of the MIR. Out of an 83 page document only two paragraphs are dedicated to natural heritage. Natural heritage should be set in the context of the biodiversity duty⁶, which places a duty on all public bodies to further the conservation of biodiversity.

Whilst the MIR states that much of the natural heritage is protected by law and national policy, **Highland Council should appreciate that it is the wider countryside and landscape-scale planning and conservation that are vital.** Designated sites should not be considered in isolation, opportunities to link them should be taken and how they link to the wider countryside considered. **It should also be remembered that biodiversity exists outwith protected sites and this is why adopting a landscape-scale approach⁷ to conservation is crucial in deciding where development should and should not occur.**

In the preferred option bullet point three, it is not good enough to state that Highland Council will ask developers to address all species and habitats issues across their sites and adjoining areas. What exactly does this mean? We would prefer that it is stated that where development is allowed and considered in the context of the surrounding landscape, local biodiversity hotspots should be conserved and enhanced, provision of high quality greenspace allocated and where the opportunity exists, the development should contribute to the local green network.

Maps of international and nationally designated sites already exist and are easily accessible to developers. What should be mapped are **local wildlife sites** which have been identified by Highland Council. In the consolidated Scottish Planning Policy, which is due for publication later this year, these are referred to as Local Nature Conservation Sites (LNCS). **LNCS should be protected from inappropriate development.** In addition, areas of semi-natural habitat the wider countryside should be identified. Only by adopting this strategic approach, can landscape-scale conservation be achieved. **Development should sit within this, not the other way around.**

We also note there is no mention of green networks - developers should be encouraged to provision green networks in their development design layout. Functional green networks connect people to nature (with the ensuing health and wellbeing benefits), allow wildlife to move between habitats and can help mitigate the effects of climate change (trees act as carbon sinks, wetlands contribute to flood defence etc.) and provide an adaptation measure for wildlife (helps wildlife to migrate from present location, in response to climate change) (see also below).

Wild land

SWT strongly supports the preferred option.

Water environment

SWT strongly supports the preferred option.

Sustainable development and climate change

Reference to Scottish Government's interim greenhouse gas emission's reduction target (i.e. 42% by 2020) should also be stated.

⁶ Section 1 Nature Conservation (Scotland) Act 2004

⁷ See for example: Hughes, J., Brooks, S. (2009) Living landscape: towards and ecosystem-based conservation in Scotland. Scottish Wildlife Trust, Edinburgh

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Renewable energy

Marine renewables- please refer to SWT's comments above on marine renewable energy.

Flooding

This section should include reference to **sustainable flood risk management**, with an emphasis on natural river processes and the use of natural habitats (woodlands and wetlands, including bogs) to alleviate flood risk in a cost-effective way. Wildlife habitats, and in particular woodlands, significantly increase the hydrological roughness of a catchment, reducing the frequency and intensity of flooding downstream. Flood risk management must be integrated with development planning so that development does not destroy natural flood mitigation. There is an urgent need of a sustainable flood risk strategy that maps the key habitats and processes, particularly in light of increased rainfall and storm events due to climate change.

Highland council therefore needs to work closely with SEPA in producing river catchment plans that identify both existing opportunities and opportunities for habitat improvement. In the long run, this will be far more cost effective than trying to tackle the problem solely downstream

Waste management

Highland council need to encourage local businesses that can use recycled waste.

Air quality

Soft engineering, such as incorporating trees into development design can improve, *inter alia*, air quality for local people and as such should be encouraged in all development.

Sustainable design

Sustainable design (SD) should be more firmly written into policy for all new building developments.

SD should be set in the context of the Climate Change (Scotland) Act 2009. Chapter 3 of the Act deals with energy efficiency. Scottish Ministers will produce a plan which includes details of how they intend to update planning and building regulations to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, through the installation and operation of low and zero-carbon generating technologies.

Bearing this in mind, in the Preferred option, **sustainable design needs to be more than "supplementary guidance" and should be built into the core of Highland Council planning policy. Both small and large new build need to be climate change proofed.** Highland Council will also have to consider and encourage retrofitting energy efficient technology to bring existing buildings up to the new required standards.

A Competitive, Sustainable and Adaptable Highland Economy

Business and Industrial land

Highland Council should remember that **truly sustainable industry must take into account environmental impacts**, as those affect Highland tourism and quality of life. **Tourism is dependent on a high quality environment that is species rich**, and as such Highland Council must endeavour to protect it (the environment) from all inappropriate and badly designed development. Therefore Highland Council should not encourage business and industry that will harm the environment. **This is why SWT supports the alternative option here.**

Accessibility and Transport

From the outset, this section should be set in the context of the Climate Change (Scotland) Act 2009. Reference should be made to a sustainable transport strategy being developed by Highland Council. The Local Transport Strategy should be renamed Local **Sustainable** Transport Strategy to reflect Highland Council's commitment to sustainable development.

Crofting and Agriculture

SWT believe that:

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- Prime agricultural land should be protected from development. This would stop the problem of house building on in-bye crofts. It should go ahead on less good quality land e.g. on the common grazings (this would mean that it could be planned for the whole township's benefit)
- If crofters apply to build a house on their in-bye, the **Crofters Commission should be the first to look at the plans** and, if there is no *practical crofting reason* for the development, then Highland Council should refuse permission (at the moment the planners look at the application and grant planning permission *before* the Crofting Commission even consider the crofting benefit of it)

Both of these complimentary actions would encourage **planned community development** rather than the ad hoc development for individual gain which is the current situation.

Coastal development

SWT believes that development in the sea must be managed as part of the new marine planning system under Marine (Scotland) Act. **SWT prefer the alternative to the preferred option** - mapping sensitive areas as a starting point. This is a much more strategic than simply doing an Environmental Impact Assessment according to the suggested approach of the Preferred Option.

Forestry and Woodland

We agree with the preferred option. Bullet point four should include reference to woodland cover designed as part of a development forming part of a functional green network.

A Healthier Highlands

Open space and physical activity

SWT welcomes the move to identify green networks, but would like to see this extended beyond amenity to include green space and wildlife habitat networks in the broader sense. Green networks in effect should be described as green ecological networks or functional green networks. It is important that the concept of green networks is embedded in the MIR to show how this requirement might sit within **all** proposed developments. As it stands, it is impossible to see how Highland Council is interpreting the term "green network".

Highland Council should state the benefits of green networks, they:

- Connect people to nature; this has been shown to have a positive effect on people's health and sense of wellbeing
- Are a driver of social inclusion
- Make Scotland a more attractive place to work and live
- Help to maintain a healthy and robust landscape which is essential to Scotland's economy e.g. tourism, fishing, farming
- Increase the protection of Scotland's wildlife
- Allow wildlife to move range in response to climate change

Highland Council should note there is a tool to identify and prioritise green networks-the integrated habitat network model (BEETLE model - developed by Forest Research).

Appendix: Suggested policy approach for development in the wider Countryside

SWT recommends the following bullet points are added:

Outwith Settlement Development Areas, development proposals will be assessed for the extent to which they:

- are sustainable
- avoid damage to natural heritage features, be they of local regional, national or international importance
- are climate change proofed

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- contribute to the local green network and enhance biodiversity

The Scottish Wildlife Trust would like to be kept informed of the progress of the LDP and we would be grateful for the opportunity to comment further if required.

Yours sincerely,

**Dr Maggie Keegan
Conservation Officer**

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