

APPENDIX 3: Draft Environmental Report May 2008: Consultation Authorities' Comments & Council's Responses

Responses from the Consultation Authorities were received and are outlined in the table below along with the Council's response to how the points have been addressed in the work to produce a Revised Environmental Report with the Deposit Draft Plan November 2008.

Overview of Key Points on the Draft Environmental Report	How the Points Have Been Addressed in Environmental Report
Historic Scotland	
<p><u>Updates to the Draft Environmental Report 2007</u> I note that our previous comments relating to baseline information have been addressed (section 3); it should be noted that all other comments made on the Environmental Report by Historic Scotland on 1 February 2008 still apply.</p>	Noted
<p><u>Strategic options and alternatives considered</u> I welcome the inclusion of further discussion on the strategic alternatives considered during plan preparation (section 4).</p>	Noted
<p><u>Examples which highlight the influence of SEA</u> I note and welcome the additional information provided on spatial alternatives, including the examples in section 5.4 which highlight the influence of the SEA on the Local Plan process.</p>	Noted

Overview of Key Points on the Draft Environmental Report	How Points Have Been Addressed in Environmental Report
SEPA	
<u>General</u> In relation to all other aspects of the ER, SEPA's previous comments of 31 January 2008 apply.	Noted
<u>Updates to the Draft Environmental Report 2007</u> SEPA notes that the errors and omissions in Appendix 1 SEPA highlighted previously have been addressed.	Noted
<u>Strategic options and alternatives considered</u> SEPA welcomes the inclusion of additional discussion on strategic options considered as part of the plan making process (section 4).	Noted
<u>Position statements for settlements including tables and maps of sites not allocated</u> SEPA also welcomes the inclusion of the assessments carried out of the sites which did not reach the draft plan. The explanation of why they were not brought forward to the draft plan was especially interesting.	Noted
SEPA is now satisfied that alternatives have been considered adequately.	Noted

Overview of Key Points on the Draft Environmental Report	How Points Have Been Addressed in Environmental Report
SNH	
<p><u>Updates to the Draft Environmental Report 2007</u></p> <p>Para 5.3 – re 6th bullet point, this would seem to make the seventh bullet point unnecessary.</p>	7 th bullet point removed.
<p>Table 6.1 – moving SAMs from “Designated Nature Conservation Sites” to “Historic Environment” is welcomed, but the resource heading of this box should really be “Designated Natural Heritage Sites”, given that NSA’s and AGLVs are also listed here.</p>	Table 6.1 heading changed as suggested.
<p>Para 8.3 – given this heading is to change, we would suggest the heading to para 8.4 also be changed, e.g. to “Summary of the environmental impacts of the Local Plan’s general policies”.</p>	Paragraph 8.4 heading changed as suggested.
<p>Appendix 1, page 51 – EU Habitats and Birds Directive – this wording change is welcomed, and technically should also be used in the previous two entries for the Habitats and Birds Directives – but in fact there is duplication here, and there should be an entry for the Habitats Directive and an entry for the Birds Directive, or else one entry for the habitats and Birds Directives combined.</p>	We are now just having a combined entry for the Habitats and Birds Directive.
<p>Page 61 – Conservation (Natural Habitats &c) Regulations 1994 as amended – suggest augment each of these “requirement” comments with – “if there would be a likely significant effect on European sites, either alone or in combination with other plans or projects”.</p>	Text inserted.
<p>Page 74 – reference to Draft SPP produced Winter 2007 is incorrect – the draft of</p>	Noted and changed.

SPP 14 is expected Summer 2008.	
Page 77 – SPP6 – suggest add reference to specific renewable energy generation target now of 50% by 2020. The existing text in the October 2007 Draft Environmental Report refers to the Council’s Renewable Energy Strategy and it is suggested this be augmented now by reference to the Council’s proposed Windfarm Spatial Framework.	Added to text It has been added that HRES is currently being reviewed and will in part be replaced with an SPG for On-Shore Wind Energy Developments.
Page 91 – alter reference to PAN 84 from Masterplanning to Reducing Carbon Emissions in New Development – some discussion text now therefore needed on this new PAN to show how the Local Plan will take this on board.	Changed.
Page 99 – Natural Heritage Futures – NW Seaboard – three others in this series should be referred to – Peatlands of Caithness and Sutherland, Northern Highlands, and Moray Firth.	Added to appendix 1.
<p><u>Strategic options and alternatives considered</u></p> <p><u>Growth Amount</u> – three options are included – for the sake of wording these can be called “low”, “medium” and “high”. It may be worth having a table either here or in the Draft Local Plan that compares the population and housing figures to 2018 under each option (this is presently missing for the “low” option). The housing requirement for the “medium” option is 557 and for the “high” option is 1304. The ER supplement says that more housing may lead to more redevelopment and regeneration, presumably meaning brownfield and derelict land – but is this so in Sutherland? Are the extra 750 houses under the “high” option located on brownfield and derelict land? Or is it the case that any brownfield and derelict land in Sutherland available for housing would be taken up whichever growth option is selected? It would be more helpful if there was discussion about whether the additional 750 houses under the “high” option has led to any additional environmental pressure being put on natural resources – such as landscapes, species, habitats, the water environment (including river and marine SACs) – and if so what mitigation measures have been put in place to minimise any such pressures? This is probably linked to the consideration next of alternative options for the dispersal of this growth across Sutherland (see below). The reference here to the greater social and economic benefits to Sutherland of the “High” growth option should not deflect from the need within this Environmental Report to</p>	Detailed information for the ‘low’ Growth Amount option has not been presented in the Local Plan; it was discounted at an early stage of appraisal as inappropriate, given the context provided by the Structure Plan and the Community Plan. The Environmental Report has been amended and clarified by exemplifying the potential positive effects for the environment that might be derived from the high Growth Amount option, which are not limited to reuse of brownfield and derelict land. It has also been amended to better acknowledge and comment on potential for additional environmental pressure arising from the ‘high’ Growth Amount option.

consider possible negative significant environmental effects.	
<p><u>Growth Distribution</u> – these options focus on the identification or not of Settlement Development Areas (SDAs) and so more accurately this set of options could be described under a heading of “Growth Management”. Might the Council have considered a set of alternative options prior to this that more genuinely could be described as “Growth Distribution”? For example was there a consideration of possible alternative distributions of future development in Sutherland across the sub-areas of (a) the principal Inner Moray Firth settlements of Dornoch, Golspie and Brora, (b) the “Central Highland” settlements of Bonar Bridge, Ardgay and Lairg, and (c) the North and West Highland settlements on the west and north coasts (reflecting the Rural Development Zones in the Highland Structure Plan special strategy)? If so, were such strategic alternatives considered against the background of environmental capacity (e.g. the presence of SACs for the Dornoch and Moray Firths) or impact on infrastructure that may itself have possible significant environmental effects (e.g. use of roads and railways, present routing of the Far North Rail Line)?</p>	<p>This set of options has been retitled and relabelled “Growth Management” as suggested. However, the suggestion to develop a further set of options representing Growth Distribution is not agreed to in this case. The strategic distribution of growth has already been established by the Spatial Strategy of the Highland Structure Plan and the Sutherland Local Plan is being prepared to conform to that. Furthermore, the strategy then informs the allocation of sites for development and the general policies of the Plan, all of which have been subject to SEA.</p>
<p>In terms of SDA’s (the matter addressed under this heading), a key issue is whether the general policies for housing development in the countryside will be strong enough in the absence of SDAs for the smaller settlements. Therefore the option selected of a limited application of SDAs (in contrast to Skye and Lochalsh in the Draft West Highland and Islands Local Plan) should lead to a consideration of the adequacy of the general policies proposed, with strengthening if necessary.</p>	<p>The general policy framework has been strengthened and will be adequate to manage development in the countryside, including consideration of environmental effects.</p>
<p><u>Position statements for settlements including tables and maps of sites not allocated</u></p> <p><u>Site options and alternatives considered</u></p> <p><u>Dornoch</u></p> <p>Site 5 – we would recommend that the opportunity is taken here to discuss possible effects on the National Scenic Area, bearing in mind however the need to correct the NSA boundary here in the Draft Local Plan.</p>	<p>The discussion regarding the site will expand the references to heritage considerations to include the NSA.</p>
<p>Site 1R – these read as policy issues against this site, rather than environmental issues. Might reference to landscape character and qualities be included here?</p>	<p>The Housing in the Countryside policy has an implicit reference to the workings of the policy and the impact of unplanned housing development in “damaging of the character of the countryside and the rural environment, the</p>

	<i>generation of increased pressures for infrastructure provision and a potential conflict with other rural land uses.” There is a need to consider policies in their context and justification as part of the overall development plan. The discussion on Site 1R will, however, be expanded to clarify this linkage.</i>
<u>Embo</u> This is a helpful discussion between two possible options – MU1 (in the Draft Local Plan) and 1R (rejected).	Noted
<u>Brora</u> Site 2 – croft land – an environmental issue, so a concern that this is not sieved through the SEA process (see general comment below under section 5.4).	The consideration of the loss of agricultural/crofting land has been considered through other examples in section 5.4. Consideration of the environmental value of crofting land will be expanded on in reference to this site.
<u>Helmsdale</u> Site 6 – a welcome reference to SHLCS in assessing this site.	Noted
<u>Pittentrail</u> Site 1R – the environmental issues should also be considered here, e.g. ancient and semi-natural woodland (a nationally important feature identified here on the Draft Local Plan maps). The matrix identifies a negative effect on an area identified of importance for nature conservation which can be added to the text here in terms of factors against this site.	Site 1R environmental issues added. Mistake in matrix – should have been answered “n” – corrected.
<u>Ardgay</u> This section needs special care as one of the allocated sites, H1, has significant negative environmental factors, thus the issue of any possible alternatives and a comparative analysis of environmental factors is crucial. This doesn’t come through even in the revised section. Site 5 SE of Lower Gledfield was identified in Sutherland Futures, and no particularly adverse environmental factors appear to be identified in the matrix. It is stated that this site could be developed in the longer term. Thus it is unclear so far in the Environmental Report how the alternative of Site H1 was selected over Site 5. Also the next revised ER should consider whether on an environmental appraisal, site LT1 should be brought forward earlier in preference to site H1. Apart from Site 2 Adjacent to Ardgayhill Road the discussion of issues does not focus on environmental matters – so might	Site H1 South of Oakwood Place has been removed as an allocation. Site 5 is ineffective due to ownership issues. This is explained further in the appropriate section of the Environmental Report. Site LT1 has been brought forward as a housing site in the Deposit Draft of the Local Plan. Site 2 now makes reference to key views.

<p>the consideration of Site 2R for example be able to make reference to the open landscape?</p>	
<p><u>Bonar Bridge</u></p> <p>Here again this section needs special care, since SNH believes there is a significant negative environmental effect for site H1. This is within the Dornoch Firth National Scenic Area. The ER should include an outline of the reasons for selecting alternatives, and hence here why other possible sites are being rejected in comparison with the negative environmental effects of H1. We believe the text should be strengthened in this respect. In particular the text for site 2R Opposite the School merely says “this is a potential area of development for the longer term once other sites are fully developed”. There is no discussion of possible negative environmental effects here (e.g. landscape character as per Q11 of the matrix) so it is very difficult other than to compare the matrices for 2R and H1 to balance this against the negative environmental issues of H1. When the consolidated Environmental Report is produced with the Deposit version of the Local Plan, the text should include discussion on both proposed and rejected sites, so that it will be possible to see the reason why alternatives have been selected where a choice is possible, especially where the selected alternative has significant negative environmental effects.</p>	<p>Site H1 has been removed as an allocation.</p> <p>We have added to the explanation of site 2R.</p>
<p><u>Lairg</u></p> <p>Perhaps some explanation needs to be given as to why the SDA boundary has been retained to include the former Site 11 (Adjacent to Post Office Depot) but the SDA boundary has been pulled in to exclude the former Site 13 (Opposite Fire Station) – are there any potential negative environmental effects of leaving site 11 within the SDA and so open to development? The SHLCS puts this the other way – with former site 13 in a proposed SDA and the former site 11 outside it – because of the “sense of arrival” point on the A839. There would appear to be a genuine alternative between two areas here for consideration through SEA.</p>	<p>The SDA boundary being drawn to include the former site 11 was a map error and has been rectified.</p> <p>Site 13 is now an allocation.</p>
<p><u>Lochinver</u></p> <p>Site 2 North of Albyn development at Inver Park was not included as an allocation but was included within the SDA. However there is a reference in this supplementary Draft Environmental Report to the need for rock blasting here is</p>	<p>This site was not brought forward as an allocation, there is no developer interest at the moment, and therefore detailed advice in the Local Plan itself is thought to be unnecessary. The reference to flood risk for land south of the pottery was removed for the same reason.</p>

<p>this site is developed. This suggests an additional development factor or developer requirement should be added to the Draft Local Plan (as done for the flood risk issue for rejected Site 3 (South of Pottery) to the effect that any rock blasting should leave face angles and vegetative reinstatement sympathetic to the surrounding area.</p>	<p>However mitigation has been added to the SEA where it can influence the planning application process if this land later becomes considered for development. This helps keep the Local Plan itself as short and concise as possible.</p>
<p><u>Drumbeg</u></p> <p>The rejection of a SDA for this settlement and any possible allocations, relying instead on the general policies of the Local Plan, could trigger through SEA the need for a consideration of the robustness of these policies to deal with individual and various housing applications, especially bearing in mind that this is within a National Scenic Area and is included in the SHLCS.</p>	<p>SEA of the Local Plan general policies has been undertaken and we are confident in the robustness of them to deal with individual and various housing applications. With respect to your concerns about this type of development within the NSA, the Wider Countryside general policy does protect settlement pattern and landscape character. Also the Natural, Built and Cultural Heritage policy, 'will allow developments that can be shown not to compromise the amenity and heritage resource.' This offers enhanced protection in terms of landscape impact and design within an NSA.</p> <p>Our approach is not prescriptive however it does offer an effective framework of policies to consider proposals against. The low level of development pressure and the dispersed nature of housing in this area make an SDA/ allocations a less suitable method. However the Local Plan will undergo monitoring which will pick up on any implementation issues for single house development if any emerge. Also regular liaison meetings with our development management colleagues along with our policy consultations responses should ensure effective and consistent application of the General Policies.</p>
<p><u>Achfary</u></p> <p>As above for Drumbeg – partly with a National Scenic Area.</p>	<p>As above.</p>
<p><u>Durness</u></p> <p>Two mis-prints – Site 2 West of School Road is actually Site 3; Site 1 West of Somo Lodge is actually Site 7.</p>	<p>These errors have been corrected.</p>
<p><u>Tongue</u></p> <p>There is no discussion of the amendment of Site 4 from Sutherland Futures to Site H2 in the Draft Local Plan in terms of omitting the southern part and extending it to the east. Were there environmental factors to omit the southern part? Or can this</p>	<p>The Tongue position statement has been updated to address this.</p> <p>The site area of H2 changed between Sutherland Futures and the October 07 Deposit draft to exclude land to the south immediately adjacent to the</p>

<p>area be considered an alternative for example to part of Site LT1?</p>	<p>road which is inbye land and considered too important in terms of its crofting value. Additional land to the east was identified at this stage even though there are access difficulties.</p> <p>The access needs to be through H2 not accessed off Loyal Terrace, and the gradient across this site makes the eastern area unlikely to be economically viable. That is unless it becomes part of a wider longer term scheme involving additional land to the south (involving common grazings on the upper part of the slope). However the market and commitment for this approach is doubtful so the eastern part of this allocation cannot be depended upon as part of the housing land supply. This also means that accessing land to the south cannot be considered an alternative to LT1 which now lies within the SDA.</p>
<p><u>Bettyhill</u></p> <p>Several sites within the SDA boundary have been rejected because they are judged to be locally important croft land (Sites 6, 7 and 8). The Draft ER Supplement does not say that this has now been reflected in the “Development Factors” for Bettyhill, and should do so, in order to make the cross-reference. However at present only Sites 6 and 7 are referred to under Development Factors as better agricultural land – so Site 8 (North of Farr View) should be added.</p>	<p>The position statement for Bettyhill has been revised to make the appropriate cross reference and to clarify that the development factor does indeed refer to site 8 and the intervening land between sites 6 and 8.</p>
<p><u>Melvich</u></p> <p>Site 2R (Halladale Junction) – it would seem more appropriate to say “if an application for housing were to come forward here, it could be assessed against the general policies” – this would read more neutral than the proposed text.</p>	<p>The sites not allocated table for Melvich has been amended so as not to assume a planning application will definitely be submitted.</p>
<p><u>Examples which highlight the influence of SEA</u></p> <p>The general thrust of this section is appreciated, but in one respect it flags up a weakness of the SEA carried out for this Local Plan. This is that in a few instances a site was rejected not because of the SEA process, but because of objections from local crofters and/or the Crofters Commission in terms of the local agricultural/crafting value of the land. This raises the question of the absence of a question in the site analysis matrix regarding locally important agricultural land. Such a question could have been in place of the question of possible impact on remote areas of value for recreation (i.e. wild land), which is not relevant for the</p>	<p>We will review the questions in the matrix for future SEA. The question on wild land will remain in the matrix to maintain consistency throughout the process of this SEA. The baseline information for locally important agricultural and croft land is not comprehensive.</p>

<p>assessment of sites for housing in settlements. The case is clearly made to adjust the SEA here to included this factor, either now for the finalised Environmental Report, or for SEAs for future similar Local Plans.</p>	
<p>This section is to be welcomed, as it discusses why on balance a site has been taken forward into the Draft Local Plan despite negative environmental effects being highlighted by the SEA process. Therefore decision-makers can see clearly counter-arguments to these areas being proposed. It is not clear however how this section differs from the earlier section on examples of where SEA has led to mitigation measures for sites being included in the Plan. Either the two sections could be rolled into one, or more usefully, this later section could focus on those sites still in the proposed Local Plan where despite mitigation being added as a developer requirement, the residual negative environmental effects could be significant. Then it would be clear to decision-makers that a loss of environmental value could occur of the site is adopted.</p>	<p>Amendments made to these parts of the document.</p>
<p>It would be useful to check if other sites should be included here as well as Pittentrail MU1. For example this section should arguably also include some discussion on the following sites, if they remain in the Deposit Local Plan:-</p> <ul style="list-style-type: none"> • Ardgay H1 • Bonar Bridge H1 • Point of Stoer H2 	<p>Ardgay H1 is no longer an allocation.</p> <p>Bonar Bridge H1 is no longer an allocation.</p>
<p><u>Appendix 1 – SEA Matrices for Site Options Not Allocated</u></p> <p><u>General</u></p> <p>As for the matrices for the allocated sites on the Draft Environmental Report October 2007, the lack of meaningful consideration of Q19 regarding any potential effects on protected or priority habitats and species is a disappointment and a cause for concern. In every instance here this has been answered in the negative, with mitigation not being considered because it is argued that habitat loss cannot be mitigated. The question is therefore totally devalued – it does not pick up those possible allocations where a protected or priority habitat or species would really be affected, and so it does not then allow for meaningful</p>	<p>We have already taken advice from the Council’s Biodiversity Officer and this was the answer provided to us. We will consider reviewing the questions in the matrix in future SEA.</p>

<p>consideration of mitigation in those circumstances – which may involve an adjustment of the area or developer requirements regarding surveys or possible timing of works. This question in particular is the key for a pro-active approach towards protection of European Protected Species and other species protected under the Wildlife and Countryside Act (e.g. bats, otters, squirrels) taking a view on where the habitat may make it more likely that they or their breeding sites or resting places may be present. Perhaps the advice of the Council’s Biodiversity Officer can be sought for more input into this question. Otherwise the SEA process really has to consider the likely effectiveness and adequacy of the general nature conservation policies to protect important habitats and species outwith designated areas – for this see SNH’s earlier response to the pre-Deposit Local Plan</p>	<p>We have made changes to General Policies 11, 12 and 13.</p>
<p><u>Helmsdale</u></p> <p>Site 6 (Simpson Crescent East) – it would be thought that Q11 in terms of the effect on the distinctiveness or enjoyment of the local landscape would have been answered in much the same way as for Site H4 in the Draft Local Plan. However while they are both scored as negative, the reasoning differs – this is unclear – the coastline effects would presumably be the key issue here.</p>	<p>Noted and amended.</p>
<p><u>Bonar Bridge</u></p> <p>Sites 2R (opposite School) and 6 (West of School) are identified and scored negative for Q8 re effect on landscape designations – but they are outside the Dornoch Firth National Scenic Area.</p>	<p>Changed.</p>
<p>Sites 4 (East of Am Mhuilin) and 5 (Am Mhuilin) are correctly identified as being within the NSA, but no negative score is assigned or mitigation offered – but it is not clear why? Is this because these are rejected sites?</p>	<p>Changed.</p>
<p><u>Rosehall</u></p> <p>Site 3 (East of the Road) – the relative proximity of the site to the SAC encompassing the River Cassley could have been picked up under Q18.</p>	<p>Noted, however the facts were picked up within the Plan.</p>
<p><u>Lochinver</u></p> <p>Site 1 (Baddidarach) – the presence here of woodland identified in the Scottish semi-natural woodland inventory (at least a local/regionally important feature)</p>	<p>The woodland at Glendarrach is already given some protection through the development factor which states that, ‘the loss of woodland should be limited and setting protected as much as possible.’ It is considered that this gives</p>

could be highlighted more in the development factors regarding this area – this could be discussed more under Section 5.4	appropriate protection to this woodland.
Site 2 (North of Albyn development at Inver Park) – see above comments re desirability of adding identified mitigation into developer requirements.	This site was not brought forward as an allocation, and there is no developer interest at the moment, and therefore detailed advice in the Local Plan itself is thought to be unnecessary. However mitigation has been added to the SEA where it can influence the planning application process if this land later becomes considered for development. This helps keep the Local Plan itself as short and concise as possible.
Site 3 (South of Pottery) - as well as reference to flood risk assessment picked up under developer requirements, this also notes a possible negative effect on local landform that could also be translated into the developer requirements.	As above
<u>Drumbeg</u> Site 3R (South of Loch Ruighean an Aitinn) – suspect there is a misprint for Q’s 8 and 11 – should be “note” rather than “none”.	Agreed – the change has been made.
Sites 1R, 2R and 3R (Culkein) – as well as negative for Q’s 8 and 11, an impact is also identified for Q26 (local landform) but this isn’t defined – is this negative too in each of these cases? Is there any theoretical mitigation possible?	Agreed - the appropriate mitigation in all these cases involves limiting to small scale development at appropriate density whilst employing careful siting. These sites are not suitable for allocation because of this but proposals for smaller scale development can be assessed against the General Policies of the Local Plan.
<u>Durness</u> A misprint - West of School Road is Site 3 rather than Site 2. Should the scoring of Q26 re local landform be negative rather than positive?	Agreed – the change has been made.
Site 7 West of Smoo Lodge – it would appear that Q11 should be “Y” rather than “N” since it is then scored as negative with mitigation.	Agreed – the change has been made.
Good siting and design is quoted several times in mitigation to negative landscape effects of sites that are still within the SDA even though not allocated sites – but this doesn’t appear within the development factors or developer requirements for	It is considered unnecessary as a development factor/requirement because an AGLV is a local/regionally important feature. This ensures that landscape impact and design factors are given greater weight in determining planning

Durness – should this be added (Cape Wrath AGLV)?	applications by way of assessment against General Policy 4.
<p><u>Bettyhill</u></p> <p>Site 4 (East of Farr Parish Church) is indicated under Q8 as affecting a landscape designation, but this is not in the Kyle of Tongue NSA, so is it within the Strathy Point AGLV? But if so is it correct then that the other sites (5, 6, 7 and 8) are not in the AGLV? Perhaps this can be checked for consistency for this settlement.</p>	The boundary of the AGLV overlaps slightly with site 4 but not sites 5, 6, 7 and 8.
<p><u>Strathy</u></p> <p>Site 1 (Below Steven Terrace) – might this be within the Strathy Point AGLV and so require consideration under Q8 re landscape designations? From Inset Map 16.1 in the Local Plan it looks like the AGLV comes inland to Strathy Bridge, and this site is just NW of the bridge.</p>	Site 1 is SW of the bridge and not within the AGLV.
<p><u>Portskerra</u></p> <p>By way of passing, if the inset maps in the Draft Local Plan for Portskerra (17.1) and Melvich (17.2) are compared, they overlap slightly, and yet where they overlap they differ in terms of the presence of a local/regionally important feature. This is shown on the Melvich map (sea-ward side of the A836) but isn't shown on the Portskerra map to the east of Melvich. It appears from the Background Maps that this is an area identified by virtue of Views Over Open Water. Therefore it would appear as though the Portskerra inset map needs to be amended to include this part of the Melvich Bay Views Over Open Water area. (NB: it is accepted this is a matter for the Draft Local Plan rather than the Draft Environmental Report).</p>	It is agreed that the Portskerra map should show the local/regionally important feature, views over open water.