

APPENDIX 1: 18 MARCH PLANNING, ENVIRONMENT AND DEVELOPMENT COMMITTEE ITEM

NEW ISSUES / GROUNDS RAISED IN NEW OBJECTIONS, RECOMMENDED SUMMARY RESPONSES AND ANY FURTHER PLAN CHANGES TO BE COMMENDED TO THE REPORTER

This report contains the recommended responses to new representations received on the West Highland and Islands Local Plan: Deposit Draft: December 2008. This includes changes commended to the Scottish Government Reporter(s) who will chair the Examination. It should be noted that there will be other non-material amendments intended to provide factual updates/corrections, improved formatting and cross-Plan consistency.

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Abbreviations/Acronyms

Certain abbreviations/acronyms are used in the Appendix as follows:

SDA - settlement development area (development boundary for town, village or township)
AH - site allocated for affordable housing only
H - site allocated for housing but on which an affordable element will be sought
MU - site allocated for mixed use (acceptable uses listed)
B - site allocated for business or tourism use
LT - long term - land suggested for development during next Plan period
I - site allocated for industrial or business use
OS - open space - safeguarded from any development
WWTW - waste water treatment works
SAM - scheduled ancient monument
AGLV - Area of Great Landscape Value
SAC - Special Area of Conservation
NSA - National Scenic Area
SPA - Special Protection Area
SSSI - Site Of Special Scientific Interest
SEA - Strategic Environmental Assessment
LCA - landscape character assessment
THC - The Highland Council

LOCHABER

Fort William & Environs

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Fort William & Environs		
General	<p>Objection to Link road safeguard that severs croft and restricts its development potential.</p> <p>Objection to too much housing land being identified because no jobs, inadequate transport networks, no diverse retailing, insufficient visitor attractions</p>	<p>NO COMMENDED CHANGE.</p> <p>Although the Strategic Transport Projects Review (STPR) does not include an A82/A830 link it remains a Council priority and is key to the activation of several allocated sites. This strategic significance justifies the continued safeguarding of a route.</p> <p>NO COMMENDED CHANGE.</p> <p>It is recognised that the housing capacity of the presently allocated sites is in excess of that required for an effective housing land supply. The examination process will test the relative planning merits of these sites and may discard less favoured options.</p>
Lack of Employment Land in Fort William (also see Plan General Section below)	<p>Little spare capacity in allocated business sites - B1 single operator, B2 for specific tourism use, B3 for tourism, B4 more likely for tourism, B5 for retail - so only 11.4 ha genuinely available for business use - insufficient for sub-regional centre. Government guidance requires a 5 year supply of marketable employment land. No justification for changes from previous plans. HIE has a proven track record of acquiring and servicing sites. Provide evidence of recent and existing unmet demand.</p> <p>Chamber of Commerce want more Class 4 only office park developments.</p>	<p>AMEND Fort William allocations MU1, MU2, MU3, MU4, MU5, MU8, MU9, MU10, MU17 to ensure each area safeguards a minimum 15% of site area for employment uses as part of an early phase of development.</p> <p>In light of the evidence presented it is accepted that there is a potential deficiency in allocated employment land in Fort William. A change in the developer requirement wording will strengthen the safeguarding of potential land. However, to specifically delineate certain areas for business only, without the capital programme commitment from HIE to acquire and service these areas, would curtail the layout options of these mixed use expansion areas and may prejudice their development for other needed uses such as affordable</p>

		housing.
B6 Glen Nevis Business Park	HIE just want Class 4 business uses and no incompatible waste facility	NO COMMENDED CHANGE. The Plan's suggested uses are compatible with existing and likely future employment uses. High profile office uses would best be accommodated on a site such as MU10 Waterfront which has the commercial advantages of town centre location, better outlook and better accessibility.
C1 Kilmallie Hall	Hall Committee ask for expanded and corrected eastern boundary.	ENLARGE site on eastern boundary as requested. Uses ancillary to a refurbished hall would be appropriate across a wider site.
MU1 Corpach Expansion Area	<p>Fear that BSW site is to be used for energy from waste plant - health risks, amenity risks, toxic ash, few jobs created, emissions, less incentive to recycle, additional road traffic, landfill text shown on map, bad neighbour development, tourism impact.</p> <p>Request for 2 significant areas of woodland to be designated and safeguarded as open space - local body intends to purchase 1 area for recreation.</p> <p>Objection to loss of public open space and mature native woodland if site developed. Desire for more public open space and footpaths and set-back from adjacent uses. Request for Allt Dogha to be a green corridor for recreation, tourism and wildlife. Request for extreme western boundary to be reduced to exclude woodland and maintain set-back from residential properties.</p> <p>HIE want BSW operational area to be zoned for Use Classes 4,5, and 6 - because it is - flat and serviced, will be available within 3-5 years, is zoned in the Adopted Local Plan.</p> <p>BSW want business or retail zoning because</p>	<p>DELETE last sentence of Lochaber Vision para 5.18 which implies Corpach in general could accommodate an Energy from Waste facility. No such facility is proposed by THC. It is investigating provision of such a facility at Portree to serve Lochaber. The ordnance survey map base reference to landfill site refers to the former landfill site and is not a council proposal.</p> <p>ADD open space notation to larger areas of woodland. The sites are increasingly valued and used areas of public open space.</p> <p>ADD developer requirement for "green corridor along Allt Dogha" and "semi-natural woodland safeguard"</p> <p>See above re. employment land safeguard.</p>

	housing and community uses incompatible with continuing sawmill operation in short term.	
MU2 Corpach Locks / Kilmallie Hall	Objection because of visual impact on classic view of Ben Nevis, impact on scheduled ancient monument, off-site flooding impact of any land raising, insufficient room for parking, turning and yacht railers, noise of yacht rigging, level crossing constraint, wildlife impact, reclamation too expensive because of steeply sloping loch floor, prejudicial to British Waterways interests.	NO COMMENDED CHANGE but see above re. employment land safeguard. The allocation supports small scale and low-key development proposals plus enhanced marine access most probably via pontoons. The developer requirements text addresses other issues. British Waterways have not objected and will be an essential development partner.
MU5 Blar Mhor	Objection to loss of common grazings which smaller crofts depend upon. Landowner/agent offer masterplanning which will deliver economic benefits, mixed use, reservation for NHS provision, sports pitches, Police HQ if needed, business land, greater scale retail, community consultation. HIE want land to west of A830 to be re-allocated for use classes 4,5 & 6 because listed in Structure Plan and Adopted Local Plan, separated from other uses, ideal for bad neighbour uses, previous now lapsed consent, dispute need for Caol Link Road safeguard across this site.	NO COMMENDED CHANGE but see above re. employment land safeguard. Most of the allocated land is blanket bog and of very poor grazing quality. The developer's commitment to a mixed use development is welcomed. The Caol Link Road safeguard is appropriate given the Council's commitment to what is a strategic route. Bad neighbour uses may be appropriate within the wider site but the commercial advantage of a prominent trunk roadside location should not be wasted for a use that would not benefit from it. The master planning process will reveal and test an optimum layout and mix of uses
MU7 Caol/Lochyside	Objection because existing Caol junctions have insufficient capacity, Caol Link Road should be built prior to development	NO COMMENDED CHANGE. The majority of the allocation is covered by a pending planning application and benefits from an adopted plan zoning. It is expected the application decision will be made before the PLI.
MU8 Lundavra	Objection because Increased size/density means increased impact, density can only be achieved by high rise development, light pollution because of gradient, unsuitable for elderly, unsafe routes to school, increased pedestrian movements along existing paths, loss of informal play space, lack of detail, better alternative housing land north of smelter, litter pollution, insufficient room for set-back	NO COMMENDED CHANGE. The density figure is indicative but doesn't necessitate high rise development. Light pollution will be an issue in any urban area and dark sky opportunities are available closeby. Similarly, other opportunities for housing for varying needs are allocated within the wider settlement. The decision on school provision has yet to be made but safe routes will be considered and any necessary

	<p>and SUDS, fear Seafield Gardens and Grange Terrace being used as loop road, compensation would need to be paid by THC if slope stability / flooding issues, trunk road queuing at West End roundabout, greater proximity to SSSI means greater impact.</p>	<p>mitigation provided. Better use of an existing footpath is a positive result. The site does not provide public open space at present but could do as part of the development. There is no intention to connect the site through Seafield Gardens and Grange Terrace. The land north of the smelter is dependent upon the realignment of the A82 which is not included in the Government's STPR. There is no significant queuing issue at the West End roundabout outwith peak periods. SNH have endorsed the change in the boundary close to the SSSI. There may at the time of the application and dependent upon the results of an engineering assessment be a need to secure a developer bond or insurance to cover the impact of any potential slope stability issue.</p>
<p>MU9/B3 Torlundy and Leanachan Forest</p>	<p>Objection because potential community severed by trunk road, dislocated parts of settlement, irreversible loss of farmland and heritage, light & noise pollution, new trunk road accesses contrary to national policy, lack of market demand in recession, upsetting social balance of existing community, not feasible given costs of A82 improvements, decreased safety on A82 due to access proliferation, poor ground conditions, school transport costs, not a genuine mixed use community, preference for tourist village, need & cost to relocate A82 roadside BT services, loss of good farmland, need for primary school or increased school transport costs, protected species impact, upsetting social balance of community, shortcomings of developer master plan, A82 improvement not in Government's capital programme, railhalt and other improved public transport connections not feasible, weight of public feeling (550 signatures on 3 petitions),</p> <p>Some residents concerned about properties being</p>	<p>ADD "protected species survey" to developer requirements.</p> <p>The development boundary has been drawn widely to include all land that may be required as part of a viable mixed use new community. THC has given no endorsement of the developer's master plan and the developer will be invited to the PLI to offer its own opinion on what uses, layout, trunk road improvements and planning gain it is prepared to commit to. It is also THC's position that the new community concept should be tested against other expansion sites within Fort William given the current oversupply of housing land within the Plan. The severance issue could be addressed by grade separated crossing provision or by concentrating on employment uses south east of the A82. Protection or diversion of roadside services is a common feature of many development sites and not an insurmountable constraint. An active travel connection to Fort William already exists and a larger community would increase the feasibility of improving a public transport that already passes through the area. The</p>

	<p>shown within area and therefore assumed for demolition. Majority of Carver family ask for their land to be included for smaller scale development.</p> <p>B3 - specific objection to ribbon development, better to just allocate land both sides of Nevis Range access, forest tracks should just be left for recreation.</p>	<p>public will have an adequate opportunity to express their opinions through the impartial Examination process as will the Carver family in pursuing any alternative tourism development concept. The B3 allocation has also been drawn widely at the request of Forestry Commission Scotland given the initial nature of their proposals. However, it is likely that any built development would be grouped close to existing developments and where services exist.</p>
MU10 Waterfront	<p>Objection because marina not feasible, visual impact, impact on Fort, better to refurbish/lower rentals on High Street Preferred joint venture bidder advises of application in Spring 2010, objects unless commerce boundary includes site, and wants boundary increased to south west to include potential enhanced marine access uses (also supported by HIE). HIE want a more comprehensive design framework for the wider waterfront</p>	<p>AMEND commerce boundary to include this site. The feasibility of the scheme will be for the market decide in conjunction with public funding bodies but is not an overriding planning consideration. The Plan allocates land within the existing town centre for refurbishment and redevelopment but setting rental levels is outwith its scope</p> <p>The preferred bidder's timetable is noted and will allow the allocation to be debated through the Examination. The site is allocated for mixed town centre uses so extension of the commerce boundary would be appropriate. Extension of the site is not appropriate given the uncertainty over the optimum location for enhanced marine access. THC, HIE and the Crown Estate is in the process of commissioning further work to provide a wider waterfront design framework.</p>
MU16 Claggan/Achintee	<p>Objection because reduced capacity will still have serious impacts on heritage, contrary to Plan's objectives especially setting of Fort William, Glen Nevis and Ben Nevis, other better allocated alternatives.</p>	<p>NO COMMENDED CHANGE. The reduced site boundary penetrates no further into the Glen than adjoining development. If anything it would round-off and provide a more attractive and defensible urban edge than the haphazard arrangement of existing development.</p>
MU17 Upper Achintore	<p>Objection because of exposure, elevation, better lower land alternatives, high development costs,</p>	<p>NO COMMENDED CHANGE but see above re. employment land safeguard.</p>

	<p>pluvial flooding, map doesn't show connecting footpaths and is therefore misleading about impact of neighbour access, loss of privacy & daylight. HIE want specific business allocation within initial phases of 0.5-1 ha close to other community facilities.</p>	<p>See above re the Examination process weighing up the pros and cons of all expansion options. The concerns of neighbours are addressed by existing developer requirements.</p>
H Tomonie	<p>Objection because already pollution in the watercourse and serious pluvial flooding.</p>	<p>ADD developer requirement for "net betterment of surface water drainage" The Plan wording already requires improvement to foul drainage arrangements.</p>
New Settlement - Fassfern	<p>Objection to downgrading of status. Want Plan content restored to Deposit Draft 2007 version because lack of master planning has only be due to THC's advice that Fort William sites should be tested for a commitment first, no land assembly problems because a single owner, fewer constraints than competing sites, already developing 12 houses including some affordable, committed to future mixed tenure. Objection to removal of tourism resort concept for Fassfern. Believe a hotel / timeshare development would be appropriate.</p>	<p>NO COMMENDED CHANGE. Fassfern offers a poorer balance of planning pros and cons than other allocated alternatives and therefore does not merit endorsement in the short term. However, the Examination process will allow for an impartial testing of its relative merits. A hotel / timeshare development would have more merit but not as a precursor to mainstream housing.</p>
General - Schools	<p>Objection to a lack of a decision on schools provision within Fort William. This decision will shape where the housing allocations should best be located, safe routes to school and minimisation of school transport costs.</p>	<p>NO COMMENDED CHANGES. The importance of the issue and its influence on housing location is recognised but school provision has separate statutory consultation procedures. Any timely decisions will be made available to the Examination for information and will also inform future planning application assessment.</p>

Remainder of Caol and Mallaig Ward

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Arisaig		
H1 North Parks	Landowner suggestion for 1 housing plot to north of site as a rounding off of approved development.	AMEND SDA to include suggested plot. This minor extension would round-off approved development.
C Centre Parks	Objection to school as attracting undesirables, incompatible with housing adjacent, higher traffic levels a danger to schoolchildren, better alternatives on road to cemetery, loss of green space that is vital to rural character and attracts tourists, loss of grazing land, not necessary to relocate school because good footpath to it.	ADD developer requirement for “footpath connections to surrounding residential areas”. The site is safeguarded for recreational area and for a primary school in the longer term. The site’s location in the centre of Arisaig caters for sustainable active travel to and from the school. Development of the site would not compromise significant public views. The location of the site also caters for surveillance from adjacent properties thus making it a safer place for a primary school. The land will be retained in agricultural use in the interim.
Erracht General	Objection because incorrect OS base map, historical associations, loss of traditional methods of farm working, adverse impact on tv/film location, geological value, green tourism impact, adverse impact on key public views, ancient monument, Great Glen Way, adverse impact on view from Nevis Range, impact on forest walks, outdoor capital brand, health benefits of accessible greenspace, protected species and habitats impacts, same owner owns more suitable land, ribbon development, landscape impact.	ADD OBJECTIVE “to secure developer funded protected species surveys and any necessary mitigation.” The scale of the SDA, its location and the level of development supported within it, are all unlikely to result in significant adverse impact to the constraints listed. A further protected species survey requirement is appropriate. The Plan allocates for accessible greenspace within Fort William.
Gairloch		
H3 & H4 N & S of Mucomir	Objection because of inadequate sewerage capacity, pollution from private arrangements, need for borehole water supplies, higher street lighting will pollute night sky even if downward emissions	NO COMMENDED CHANGE. There is no specific, confirmed SEPA objection and appropriate private arrangements are feasible. Potential light pollution will be mitigated by an intervening tree

		screen. SEPA does not confirm any flooding issue with H3 and a requirement is specified for H4. The objectives cater for the protection of recognised views whilst there is no indication that fisheries will be affected from any development in Gairloch. The local plan has to provide sufficient land potentially available for development in order to accommodate for the settlement's growth and for choice. The objectives cater for the protection of recognised tourist views.
B West of Caravan Site (Gairloch)	Request for reference to ancient monument	ADD developer requirement to respect scheduled ancient monument and its setting.
Invergarry MU1	SEPA objection to principle of development because no acceptable public / private foul drainage solution.	SEPA's position is unreasonable to embargo any development on a site that is close to the centre of this dispersed village. Changes similar to those proposed for Inverarish and Edinbane would be acceptable to THC but are not offered given the "in principle" objection from SEPA.
B2	Transport Scotland objection to no footpath connection and contrary to national planning guidance.	NO COMMENDED CHANGE. The site represents a brownfield opportunity. The existence of a footpath on the south side of A 87(T) and the business nature of the allocation mean that there are fewer concerns regarding pedestrian safety. The site's distance from the main settlement is a potential advantage for any bad neighbour use.
Kinlocheil (Braeside)	Landowner objection requesting an additional SDA for Braeside because existing housing grouping and would represent rounding-off.	NO COMMENDED CHANGE. The site has no community facilities, falls within the commuter hinterland area and suffers from trunk road proximity, access, woodland and flood risk constraints.
Mallaig		
East Bay	HIE request a specific allocation for marine related business / tourism use enabled by further THC/HIE feasibility work.	NO COMMENDED CHANGE. The Plan objective already addresses this issue.
Suggested New Allocation Croft St Elmo	Request for one infill plot from housing association.	NO COMMENDED CHANGE. The site lies within the SDA and therefore carries a presumption in favour of development unless the site-specifics indicate otherwise.

Morar		
C2 Cemetery	Objection because insufficient community consultation.	NO COMMENDED CHANGE. The allocation of land for the expansion of cemeteries does not merit any more consultation than that for any other allocation. Transport Environment and Communities Service advises that the cemetery in Beoraid will need expansion and the local plan safeguards land for that and any future needs.
Roy Bridge		
Suggested New Allocations Achaderry	Landowner suggestion to amend mixture of sites to provide community land, public open space and 7 house plots.	NO COMMENDED CHANGE. The proposal merits further consideration at Examination but issues still remain in terms of flood risk, protected species impacts, loss of woodland, delivery of useable public open space and the need for developer funded access improvements.
B1 NW of Stronlissit Hotel	Objection because incompatible with housing adjacent, inefficient access, tree retention required, obtrusive main road signage.	NO COMMENDED CHANGE. The site is in a central, sustainable location and has the commercial advantage of trunk road visibility. Business uses do not necessarily contradict community or residential amenity. There is no significant trunk roadside planting which would require tree felling or obtrusive signage.
Spean Bridge		
MU1 Burnbank (South of Primary School)	Objection because detrimental to adjacent tourism business, loss of greenspace, legal control of side road and could block access from this direction.	RETAIN site BUT REDUCE indicative capacity to 8 units. The developer requirements cater for the retention of a green screen to the A 86 and for high quality design but a capacity reduction would make these easier to achieve in planning application layout terms. The trunk road is well aligned in this section and an access from it should prove feasible if the objector is not prepared to negotiate access from the west.
MU2/LT2 Opposite Little Chef	Objections because of lack of detail, lack of market demand given current recession, cost of A82 widening, lack of primary school capacity, no safe route to school from site, need to safeguard roadside	ADD specific developer requirement for a "minimum of 1.5ha for a sports pitch and other public open space". The acceptable/potential uses of mixed use sites are listed in the developer requirements for each site. In

	<p>trees, need for greater greenspace, need for more sheltered housing, excessive scale, tourism impact, better brownfield alternatives that should be developed first. Want guaranteed public toilets and car park.</p>	<p>addition there is a requirement for the protection of trees. The local plan covers a time period longer than the a particular cycle in the housing market. No significant widening of the A82 should be required. Safe pedestrian connection improvements are specified. The affordable housing policy of the plan requires 25% of developments over 4 units to be affordable and THC's policy is for 25% of these units to be suitable for the elderly. Under-grounding or diversion of overhead lines is a cost for the developer but not an insurmountable one for this site. Flood risk is also addressed by a developer requirement. Available brownfield sites are zoned but do not comprise a sufficient land supply on their own.</p>
<p>Suggested New Allocation Ferguson Transport land W of Spean Bridge</p>	<p>Request for extension of SDA to west because this is a natural infill site, its serviceable, will finance relocation of local business, its brownfield , land to the east already benefits from a planning consent.</p>	<p>EXTEND SDA to include suggested land south of the A82. Although the site would complete a series of ribbon development, distant from the village centre, it does represent an infill, brownfield site. The existing settlement objective will be used to secure extension of the existing footpath connection to the village centre.</p>

Remainder of Fort William & Ardnamurchan Ward

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Acharacle		
H2 Ardshealach	Objection because expanded site will have greater impact, loss of wildland, loss of rural character, junction / road improvements will involve blasting and potential damage to adjacent properties, too far from village centre, better central alternatives, increased capacity contrary to settlement pattern, .	NO COMMENDED CHANGE. The site capacity is erroneous and relates to a planning consent capacity that only covers part of the site. The Reporter may wish to consider a higher capacity if the site is confirmed following Examination. THC considers that 25 units would be a more appropriate indicative capacity.
Mingarry SDA	Request SDA amendment to avoid ribbon development. SDA as drawn supports single plot depth ribbon development with several accesses and will lead to coalescence of 2 townships that should be separate.	NO COMMENDED CHANGE. The SDA boundary has been drawn to avoid flood risk areas and to maintain a separation from adjoining development. The existing pattern is of roadside development and shared access arrangements are feasible.
Ardgour/Clovullin/Corran		
H3 Woodend (S)	Objection to deletion / reduction of site from last draft. Wants SDA extended at south end for small scale crofting style development comprising agricultural buildings and self catering holiday letting accommodation. Reasons - will help cross subsidise one of the few actively worked local crofts, loss of small area of croftland not vital as lack of people to work it and this area is poorer part of in-bye, will round off an existing group of development.	ENLARGE SDA at south end to include minor suggested extension. The suggested extension is minor and rounds off an existing housing grouping. The loss of croftland is not significant in relation to the size of the unit which will continue to be worked. Formal consultation with the Crofters Commission at application stage would be appropriate.
H5 North Corran (LS)	Objection to need for flood risk requirement	NO COMMENDED CHANGE. The requirement is specified, in consultation with SEPA, for sites within or adjacent to a 1in 200 year risk area not 1in 40.
MU SW of school (LS)	Objection because of crime, incomers, lack of pavements, traffic safety, insufficient school capacity,	NO COMMENDED CHANGE It is an objective of the Local Plan in Ardgour to secure

	insufficient elderly housing provision. Support for specific health centre proposal because land is serviceable, possible shared car park, need for closer provision than Strontian or Fort William.	developer funded footpath improvements. A new health centre would be an acceptable uses on this site.
Ballachulish South		
MU Former Station Yard	Want access from east through TIC car park - access from west too narrow - want pedestrian access from medical centre preserved. Objection that allocations doesn't reflect retail consent.	ADD developer requirement for "pedestrian connection safeguards and improvement" Access to the retail consent will be from the east. Improvement to the western access is feasible. The Plan wording acknowledges the retail consent.
Duror		
SDA & Suggested New Allocation N of Hotel at S end of village	Landowner suggestion for 4 houses on A828 via SDA extension and LT site north of hotel for housing and tourism. Justifies SDA because single new access, part adopted plan allocation, part consented, close to facilities and could accommodate sites outwith flood plain. Objection to any extension to SDA south of Old Mill cottages because of flood risk, ground conditions, overhead electricity lines, unsafe access off A828.	NO COMMENDED CHANGE. There is no evidence presented of agreement with Transport Scotland or of the results of a flood risk assessment and adequate alternatives have been allocated. If these constraints can be overcome then applications could still be pursued and tested against the Plan's general countryside policies. These issues also apply to the hotel expansion site where the protection of the cycleway and unadopted bridge/road capacity issues also militate against a positive allocation of land.
H2 S of Achindarroch Road	Request for privacy/ daylighting set-back from property at north-east end of site.	ADD developer requirement for "privacy/daylighting set-back from adjacent properties" The shape of the site may cause privacy/daylighting issues and therefore a requirement is appropriate.
MU Adjacent to former hotel	Objection because of lack of jobs, facilities, infrastructure and contrary to settlement pattern.	NO COMMENDED CHANGE. The change to a mixed use allocation allows the prospect of local employment. There are no known infrastructure capacity issues and the site is central to the village.
Glenachulish		
MU1 W of A828, MU2 E of A828, MU3 S of A82	Object to any interdependency requirement between the sites. Request deletion of development embargo wording unless sites presented in joint way. Want higher housing density on MU2 up to 35 from 25.	DELETE paragraphs above and below MU3 allocation table but reject increased density. ADD developer requirements for "adequate trunk road access arrangements" for all sites. The commercial tourism

	Specific Transport Scotland objection to safety of connection between local and trunk road network.	potential of the sites justified their inclusion so continued insistence on mixed use is appropriate. The linking of the 3 sites in terms of masterplanning and servicing is desirable but not an essential pre-requisite. However, individual applications will still be judged in how well they link with and do not prejudice the development of adjacent land.
Inchree		
MU N of River Righ	<p>Not financially feasible, upsetting the social balance of the community, too close to existing houses, lack of market demand, unclear traffic priority, insufficient capacity of facilities & infrastructure, heritage impacts, contrary to settlement pattern, open space too formal, scale, excessive density, increased commuting on not to be improved A82, contrary to other plan policies, negative impact of light industrial units.</p> <p>Request for playing field, hall and changing facilities</p>	<p>ADD developer requirements for “otter and other protected species survey”, “net betterment of surface water drainage” and “upgrade of waste water treatment capacity”.</p> <p>Although the financial cost of a safer junction onto the A82 is not a justification for a larger scale of development within the village, a 16 house development would not lever the finance necessary to construct such a junction and connecting road. In the absence of Scottish Government funding to resolve what is an existing deficiency then the choices are no development or a level of development that finances a solution to the village’s access needs. THC believes that such a significant established village should be allowed to grow in a planned way rather than allow development pressure to be dispersed in an ad-hoc manner to the surrounding countryside. Other concerns are already addressed in the developer requirements or will be at the planning application stage. The mixed use nature of the allocation allows the prospect of local employment and therefore commuting may not necessarily increase. Many housing allocations are made in Fort William. It is most likely that business uses will be tourist related and would require to be compatible with adjacent uses. Infrastructure capacities are adequate or are specified in the developer requirements.</p>

H S of River Righ	Objection to privacy loss and because of flood risk and heritage impact.	ADD developer requirements for “otter and other protected species survey”, “net betterment of surface water drainage” and “upgrade of waste water treatment capacity”. Flood risk is addressed in an existing requirement. The boundary of the site has already been amended to ensure that the impact on the SAC was minimised to an acceptable level through consideration of its impact (Appropriate Assessment).
Kilchoan General	<p>Community Council want extension of SDA at Glebehill because no SSSI impact, central, good road access and dispersed ownership. Also want business allocation opposite church for shop and petrol pumps because its central. Believe SDA should be much more widely drawn to not prejudice any particular proposal.</p> <p>Housing association propose 2 unit development opposite hotel.</p>	<p>NO COMMENDED CHANGE.</p> <p>The suggested changes may have merit but are not specific enough to justify a current change. It is suggested that these small scale proposals are best pursued and tested via the development management process and considered on their merits against the general policies of the plan. A widely drawn SDA would carry too positive a policy presumption that could compromise the established settlement pattern, good croft land, and heritage interests. In the centre of the village the SDA does not join up because of the functional flood plain.</p> <p>NO COMMENDED CHANGE.</p> <p>The site lies within the SDA and therefore carries a presumption in favour of development unless the site-specifics indicate otherwise.</p>
Lochaline		
B2 NE of War memorial	Loss of public open space & woodland, steepness of land makes it undevelopable, loss of public views	ADD developer requirements to “retain footway link to lower road”, “maximise retention of woodland” and “safeguard public views over Sound of Mull”. The footpath has been mostly excluded from the allocation

		so that it is retained. Only part of the site is steeply sloping and it will be for an application to determine exact layout.
North Ballachulish		
SDA	Request for SDA extension to accommodate croft house development because no alternatives on croft within SDA and local family need. Only way to provide affordable plots. HIE request extension to SDA to include industrial area.	NO COMMENDED CHANGE. Although the proposal has merit it would set a precedent that may erode the established settlement pattern and in by land. The HIE proposal, if it relates to the existing industrial estate would be likely to impact upon the scheduled moss area.
H1 Between N Ballachulish and Oldtown	Objection to loss of croft land, density, heritage impacts, and absence of watching archaeological brief requirement.	ADD developer requirement for “protected species survey”. The requirement for a watching brief will be considered at the planning application stage. The density is appropriate to a village location. The Crofters Commission have not maintained their objection to this site.
H2 N of Loch Leven Hotel	Request for better clarification of northern boundary.	NO COMMENDED CHANGE. The boundary accords with the recent planning consent boundary.
B1 Adjoining business park	Objection because of noise, ancient monument impact, property depreciation, inadequate existing access	NO COMMENDED CHANGE. Material planning factors have been addressed in the developer requirements.
H Onich	Objection to lack of clarity in THC’ position. Transport Scotland objection to trunk road junction visibility.	There is no contradiction between the local plan content and the planning consent issued for the site. The vast majority of the site is consented.
Salen General	Objection to inclusion of land west of hall within SDA. Planning permission may lapse and should be a playing field.	NO COMMENDED CHANGE. The site benefits from a recent consent for housing. Its ownership position is unclear. However, the site is central, developable, free from known constraints and should therefore be retained within the SDA with a positive development presumption. The land is not

		currently in active playing field use.
Strontian		
B2 Former hotel	Objection because insufficient consultation, ownership dispute, ground conditions, traffic safety, recent appeal decision, root damage to TPO trees if extended access, business uses not compatible with housing adjacent.	DELETE allocation but leave within SDA. The recent appeal decision removes the last frontage site that could have been commercially attractive to a tourism facility. This and the TPO constraints mean that any future potential will be limited to selective infill. Neighbour notification of this Local Plan was not a requirement however the Council trialled the process for this Plan and is grateful for comment on how it may be improved.
Drimnin General	Request for extension to SDA to include land that is part consented, will have no heritage impact and is serviceable. Request for exclusion of land from SDA west of pier which is prominent from public road and the sea	AMEND SDA as requested. The additional area is relatively unconstrained in a settlement that offers limited development opportunities. The pier land is visible rather than prominent but merits the more cautious policy presumption that the Plan's countryside policies provide.

LOCHALSH

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Achmore General	Objection to all allocations because of loss of good farmland, excessive density, contrary to local community consensus, contrary to adopted local plan, community sites not feasible, oppose any junction improvements because of loss of rural character.	NO COMMENDED CHANGE. THC has a statutory duty to produce a local plan and Achmore is an established settlement with a community facility and a significant grouping of housing and employment buildings. National planning policy supports the principle of directing housing and supporting facilities to such established settlements. The current settlement pattern is clustered and therefore further clustered development would be appropriate.
AH W of former Council housing	Objection that development will increase surface water flooding issue	ADD developer requirement for “net betterment of surface water drainage”
Auchtertyre		
MU2 W & N of primary school	Objection to severance of primary school from play area, loss of greenspace to rear of property, traffic safety issues since less safe route to school for some children and more turning movements within village - suggests no connection to village road network and no closure of existing accesses.	NO COMMENDED CHANGE. The present village accesses present a trunk road safety issue and to not close off the accesses would represent a missed opportunity. Severance, turning and safety issues will need to be resolved within the expanded village by careful layout planning but these routes will be lightly trafficked in comparison and traffic speeds will be low. Preserving greenspace to the rear of particular properties is not a proper planning purpose or consideration.
Camusluinie SDA	Crofter request for extension to north of settlement as developable land.	NO COMMENDED CHANGE. The suggested change would not be in keeping with the existing clustered settlement pattern and may compromise landscape and road capacities. The Plan's countryside policies don't place an embargo on development outwith the SDA.
Glenelg & Glen Bernera		
SDA	Want SDA to exclude area between Glen Bernera and ferry because too much development potential,	NO COMMENDED CHANGE. The extension to the SDA was made at the request of

	<p>ribbon development, loss of semi-natural woodland, steep contours makes much of land undevelopable or excessive cut and fill, bird species impact, loss of seaward views, loss of tourism because of adverse visual impact, loss of croft land and landscape, flood risk, better assessed against housing in the countryside policies or constraint policy, likelihood of poor designs because of past completions, loss of land of recreational value, other better allocated alternative land, coalescence of separate communities, Bernera not a recognisable settlement, impact on listed ferry house, historical significance of drove road, contrary to settlement pattern, contrary to national planning policy, misleading to developers, contrary to other THC policies, will only be developed for second homes.</p> <p>Objection to corner plot near Barracks because of avenue tree loss</p>	<p>the local community council to foster development along the road to the Kylerhea ferry. The SDA encourages economic and tourism development as much as housing proposals and is designed to support tourism developments on the landward side of the ferry road to attract tourists along that route to a ferry service that is very marginal. It is accepted that very few sites are physically capable of development along this route even with cut and fill but this in itself will act as a brake on development and will prevent ribbon development. Glen Bernera itself is a secluded Highland glen with few constraints and well designed, break of slope sited development would not have an undue impact.</p> <p>The settlement's objectives already list the tree lined avenue as a development constraint.</p>
H1/H2/H3 Land N of Cosaig road	Objection to loss of privacy, private and secure parking, construction and busy road access safety issues, limited infrastructure, property depreciation, decline of primary school roll if their family leaves.	<p>NO COMMENDED CHANGE.</p> <p>Personal migration decisions and perceived property depreciation issues are not material planning considerations. The layout could preserve private parking provision and leave a privacy set-back.</p>
MU2 E of health centre	Objection because of remoteness of area, lack of demand, poor ground conditions, excessive density, visual impact, loss of privacy & amenity, loss of tourism, loss of private view, affordable housing should be provided by buying up surplus properties.	<p>NO COMMENDED CHANGE.</p> <p>The site lies close to the centre of the village where relatively higher density development is appropriate. Many existing properties don't meet the space and accessibility standards required for affordable housing. The ground conditions constraint is recognised and is being assessed at present.</p>
Inverinate		
AH Land adjacent to Kintail Parish Church	Objection because better alternatives on crofts, will only go to incomers, no jobs in the area, Ratagan a better option.	<p>NO COMMENDED CHANGE.</p> <p>Not every local person has access to family croftland for their affordable housing needs and not all crofts have sufficient suitable sites in planning terms. With declining</p>

		household sizes the same number of people require more houses. Land is also allocated at Ratagan. The allocation policies of the housing agencies are constrained by legislation but the vast majority of units are let or sold to those with a local connection.
Kyle of Lochalsh		
Commerce Centre	Objects to too wide a boundary, should just be the mixed use core of the village and makes it very difficult to apply the sequential test.	NO COMMENDED CHANGE. A tight boundary would not be appropriate to Kyle of Lochalsh because of its central parking problems, its lack of feasible central development sites and because peripheral sites may be just as accessible for many existing and new residents.
Plockton		
Glebe / Park	Objection to land being within SDA because wall is very difficult to move due to its structure and adjacent tree, incorrect and misleading reference to school use being infrequent (actual use frequent), loss of vital recreational and educational asset for school, offer of continued community use and non-Council maintenance, infrequent community use, saving THC money in providing free and maintained open space, valued open space under the terms of SPP11, presence within SDA inflates value and will attract inappropriate development proposals.	NO COMMENDED CHANGE. The listed constraints are accepted but still do not justify excluding the land from the SDA or safeguarding it as valued public open space. The Plan should not be used to artificially depress land values without reference to the particular development potential merits and demerits of the land concerned.
AH2/C S of Cooper Street	Objection to loss of scarce useable public open space, part in separate ownership so less implementable.	NO COMMENDED CHANGE. The emergence of a new claimed ownership interest further complicates the viable development potential of the site but referral to Examination would allow an impartial hearing of all competing views.
Reraig		
MU E of caravan park	Objection to height of buildings - wants 2 storey maximum	NO COMMENDED CHANGE. 1.5 storey would be typical rural Highland requirement but a prescriptive height would not be appropriate for a site that does not have a particular landscape sensitivity.
Sallachy SDA	Objection to possible adverse impact on settlement	ADD/AMEND objective " to secure a collective, master

	<p>pattern and landscape character</p> <p>Crofting community request for further extension to east because expansion area included at present only benefits one crofter as an apportionment and land is serviceable.</p>	<p>planned, crofting community development of the township expansion area”</p> <p>A further extension may threaten landscape and road capacity. The apportionment area could still be developed on a collective basis and other capacity exists within the SDA.</p>
<p>South Strome General</p>	<p>Objection to name South Strome rather than Stromeferry because the Stromeferry (no ferry) road sign is a tourist attraction.</p>	<p>NO COMMENDED CHANGE.</p> <p>The Plan will not lead to the road sign being changed. The name changed originated from a request by the community who thought a more accurate and up to date name would be more forward thinking.</p>

Eilean a' Cheò (SKYE)

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Achnacloich	Request better reference to SSSI Landowner request for SDA extension to west because it would include existing development, few constraints and serviceable.	AMEND objective "to protect the geological SSSI at the north end of the settlement" The suggested extension would enclose too large an area and would not replicate the existing linear crofting settlement pattern.
Aird Bernisdale	Request for extension to SDA on south west margins because poorer croftland and serviceable.	NO COMMENDED CHANGE. The land is prominent in public views across open water. Suitably sited and designed proposals outwith the SDA may still be acceptable but this landscape sensitivity does not justify a more positive presumption.
Aird of Sleat	Request change in erroneous reference to SSSI.	AMEND objective "to protect the geological SSSI in the south west part of the township"
Armadale (Sleat) Old MU3 Armadale Pier	Objection to deletion of site from last Plan draft because Community Trust support its allocation, brownfield, previous allocation, proposed horticultural use, gateway to Skye and poor appearance at present, landowner has good track record in low impact green tourism, private finance to undertake coastal protection and reclamation works, would also support community uses.	NO COMMENDED CHANGE BUT THC TO BE NEUTRAL AT EXAMINATION The proposal has merit but is very unlikely to be feasible. There are also counter objections that led to the withdrawal of the previous allocation. It should be for the developer to demonstrate to the Reporter and counter objectors that a suitable proposal could be feasible.
Broadford General		
Commerce Centre	Objection to inconsistent references to Broadford as "Area" and "Sub Area Centre" Dispute whether there is any spare retail expenditure given recent consents on Skye and suggests no retail allocations or mixed use in Broadford.	DELETE "Sub" from "Sub Area" in GP17 AMEND allocation "R" to be mixed use with acceptable uses "retail, business, housing, community." It is appropriate to recognise the changes in the retail market and allow more flexibility.
H1Glen Road	Objection because transport assessment flawed, development will lead to increased traffic on Bayview Crescent which will compromise safety, infill plots should be developed first before the rest of H1 is	NO COMMENDED CHANGE. A large part of the site benefits from an extant planning permission. The improvement of Bayview Crescent is largely a separate matter albeit a physical connection

	developed.	exists.
MU4 Cnoc na Cachaille	Request for master planning requirement.	ADD "developer master plan" developer requirement
Camuscross / Duisdalebeg		
SDA	Objection to possible adverse impact on settlement pattern and landscape character.	ADD/AMEND objective " to secure a collective, master planned, crofting community development of the township expansion area"
MU Duisdale	Objection to loss of seaward views, loss of open ground for village games.	REDUCE site BOUNDARY to that in immediate vicinity of hall. Subsequent discussions between the landowner and community interests have revealed that a smaller site would be adequate and feasible.
Drumfearn	Request that inventory woodland is referenced.	ADD objective "to safeguard inventoried woodland"
Dunans	Request better reference to SSSI.	AMEND objective "to protect the geological SSSI by safeguarding the landslip features throughout the settlement and the rock outcrops along the coastline"
Earlish	Incorrect house name added to map base.	DELETE added house name
Earlish East	Incorrect township name - should be Cuil.	AMEND name to "Upper Cuil"
Edinbane H2/H3/LT Coishletter	Reaffirmed objections.	THC's position will need to be updated to reflect its decision on the related planning application which is likely to be made prior to the Examination.
Elgol	Request that SSSI is excluded from the SDA.	AMEND SDA to exclude that part of SAC within current boundary. The change is minor and will ensure greater cross-Plan consistency.
Glengrasco	Objection to possible adverse impact on settlement pattern and landscape character	ADD/AMEND objective " to secure a collective, master planned, crofting community development of the township expansion area"
Glen Hinnisdal	Objection to non-exclusion of upper part of Glen from SDA because THC has recognised in a planning application report the different more dispersed settlement pattern in this part of the Glen, lower Glen has more, adequate capacity and fewer constraints.	NO COMMENDED CHANGE. The SDA encloses more undeveloped land in the lower Glen which recognises this relative potential. Upper Glen constraints are addressed in the Plan objectives.
Harlosh	Objection to southern corner of SDA because of precedent, sufficient other development potential within the SDA, underestimate of environmental	NO COMMENDED CHANGE. This corner plot will not set an inappropriate precedent and will not result in significant adverse environmental

	impact.	impacts.
Kyleakin		
H1Old Kyle Farm Road	Concern that development will increase surface water flooding issue. Landowner request for further extension to west because it represents the only realistic option for family housing and safe trunk road access can be formed.	NO COMMENDED CHANGE. A net betterment requirement for on and off site surface water drainage already exists. The landowner has other options within the allocated site which has already been enlarged. Any further enlargement would create ribbon development and increase proximity issues with the quarry.
H2/AH E of playing field	Concern that access route doesn't pass too close to property "Birches"	NO COMMENDED CHANGE. This decision will depend upon the layout proposed at planning application stage but a prescriptive set-back from a particular property would not be appropriate.
MU Youth Hostel	Reaffirmed objections to loss of long standing commercial use, tourism value, income to bypassed village, destination use, closure of PO/shop, no viable/allocated alternatives, footfall, centrality, other allocated housing alternatives, active community proposal.	THC's position will need to be updated to reflect its decision on the related planning application which is likely to be made prior to the Examination.
Kylerhea	Objection to natural heritage impact of SDA	ADD objectives "to secure a developer funded otter survey where appropriate" and "to avoid significant cut and fill in the visually prominent parts of the settlement" The pending appeal decision was made in October 2008. The Reporter concluded that the central area of the SDA was acceptable for development in terms of settlement pattern and road capacity. Therefore no further change to the boundary is proposed.
Maligar	Request for further extension of SDA to include poorer croftland for development	AMEND SDA as requested. The extension areas are on to land where previous evidence of settlement exists and where few constraints exist.
Portnalong & Fiscavaig	Landowner request for extension to SDA to include surplus fish farming operational land because brownfield.	NO COMMENDED CHANGE. The site is divided by a natural watercourse and has flood risk issues. It may support development but the

		constraints are sufficient to not offer more positive support.
Portree		
Commerce Centres	Objection to 2 commerce centres identified as not having a clear hierarchy and function. Fear large scale retail at Dunvegan Road. Dispute justification for THC's approach.	AMEND Portree Inset Map Dunvegan Road commerce centre boundary to include area consented to Oatridge. The September PED Committee resolved to enclose consented land within the commerce boundary. The changing hierarchy within Portree reflects recent planning application and non call-in decisions.
H1 Achachork	Request for reference to adjacent ancient monument - Dun Gerashader	ADD developer requirement to "respect setting of adjacent ancient monument"
H2 Woodpark	Objection to northern section which is in Co-op ownership. Want site re-allocated for retail or mixed use including retail. Other allocated housing site alternatives.	NO COMMENDED CHANGE. The site is constrained in terms of access and would function best in land use terms if developed in conjunction with adjoining land to the south. Residential development would be most appropriate given the pattern and character of existing uses across the wider site.
MU3 Bayfield	Objection to loss of Green gap site and classic view of Cuillin, retail impact of Tesco on village centre if in Bayfield.	NO COMMENDED CHANGE. The gap site view is already safeguarded in the site's developer requirements. A recent consent, which may be taken up by Tesco, has been granted elsewhere in the village.
Raasay (Inverarish)		
General	SEPA suggest any private foul drainage solution should be compatible with or make a future Scottish Water solution more feasible.	AMEND DEVELOPER REQUIREMENTS for allocations as requested.
Suggested land E of Raasay Hotel and designed landscape NE of School Park	Owner disputes need to fund improvements to road and importance of designed landscape.	NO COMMENDED CHANGE. The road has carriageway width, alignment, visibility and limited number of passing places constraints. Further development will worsen this existing deficiency and should contribute in proportion to that net detriment. The designed landscape boundary reference is factual and is a development factor.
Staffin General	Objection to landscape impact of allocations.	AMEND developer requirements for H1 & AH1 "building form and layout to comprise two 1.5 storey

		semi-detached housing blocks fronting the side road” NO COMMENDED CHANGE FOR H2 & B These allocations are more distant from the tourist route, lower lying, part developed and represent one of the few non in-bye site alternatives.
Suisnish East	Request for reference to iron ore workings ancient monument.	ADD objective "to safeguard and respect setting of ancient monument"
Tarscavaig	Objection to SDA because should follow outer township boundary.	NO COMMENDED CHANGE. The SDA is a boundary to enclose areas where development will be supported subject to the site-specifics of particular applications. It will not therefore always follow crofting township boundaries. The additional areas identified may compromise landscape character.
Torrin	Request that SAC (limestone pavement) be cut out of SDA.	AMEND SDA to exclude that part of SAC within current boundary. The change is minor and will ensure greater cross-Plan consistency.
Uig General & I N of industrial estate	Community council request for better car parking at pier head, better use of CalMac building and better enforcement of Touchwood recycling activities.	NO COMMENDED CHANGE. The matters raised are not relevant objections to the Plan's provisions.

VISIONS, STRATEGIES & GENERAL

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
Renewables General	Objection to support in principle references because these should be caveated by reference to impact on valued landscapes	DELETE all remaining site-specific renewables references - e.g. para. 6.64. ADD factual update of THC's further work on this issue in para. 6.41.
Lochaber Strategy & Vision General	<p>Para 5.17 - request for better reference to setting of Fort, deletion of Castle Tioram restoration reference, correction of Kinloch Castle SAM reference</p> <p>In-migration aim should be realistic and aim at higher income middle aged professionals not the young who will leave for greater diversity of employment and social opportunities. This will be more realistic and will strengthen the skills and tax base of the area but requires attractive living environments with broadband access and accessible greenspace. Attracting this home-working sector will be more successful and reliable than depending upon tourism</p>	<p>AMEND heritage references as requested.</p> <p>There are many attractive Highland areas with suitable broadband access that will help foster the home-working sector. Many very rural phone exchanges have now been ADSL enabled and further advances in technology will increase availability even to the most remote areas. This coupled with THC's permissive housing in the countryside policies allows many suitable locations for potential and existing home-working migrants.</p>
Appendix 1 General	<p>Request for better cross-referencing of updated Scottish Government guidance</p> <p>Objection to omission of national test wording for SSSIs, NNRs and NSAs</p>	<p>ADD better cross referencing to whatever Government guidance is relevant at post -Examination draft issue</p> <p>See Sutherland Local Plan</p>
Appendix 3 General	Request list of where paper copies can be inspected and deletion of "key principles" section as potentially misleading	AMEND as requested. The changes would offer clarification.
Purpose and coverage of heritage designations & issues	Request for balanced references to heritage issues	<p>AMEND as requested in paragraphs 5.1, 5.11, 5.25, 5.27, 6.18, 6.8.8</p> <p>REJECT suggested change to para. 6.16 (access and recreation) the suggested wording is written as a policy and other guidance covers this issue with adequate balance.</p> <p>REJECT suggested change to para 7.51 (core path plans) the suggested wording is written as a policy and</p>

		the HWLDP and other guidance covers this issue with adequate balance.
Treatment of SSSI's and SDAs	Request for consistent referencing of SSSIs where they overlap with SDAs	AMEND as requested. Specific references are detailed in the area sections above.
Treatment of NSA's and SDAs	Request for consistent referencing of NSAs close to and within SDAs	ADD objective to "To protect the integrity of and secure exceptional siting and design within the NSA" to all relevant SDAs
Treatment of crofting expansion areas	Objection to possible adverse impact on settlement pattern and landscape character	ADD/AMEND objective " to secure a collective, master planned, crofting community development of the township expansion area" for all settlements where a large area of common grazings has been enclosed within the SDA
Treatment of Natura sites and SDAs	Request "drainage to land" objective for all SDAs draining to Natura water bodies	ADD suggested objective to all relevant SDAs
Mapping Heritage designations and Hinterland	Request for factual update of new sites and correction to headings	ADD new sites including recent Natura sites and correct AGLV map heading
Employment Land Lochaber General	Objection to lack of specifically allocated employment land in all main settlements but in particular in Fort William. Not content with mixed use allocations because no guarantee of employment land. Point out qualitative deficiencies in all identified business sites. Claim support from Structure Plan and national planning guidance. Also want general support for enhanced marine access, sites for relocated uses, a more explicit A82 lobbying policy. Point out contradiction with Vision which set out need for 700-800 new jobs. Therefore needs a range of employment sites to maximise opportunities for potential users. Produce evidence of past and current demand. Believe this demonstrates unmet demand in terms of land and premises which is in part due to lack of suitable sites. The private sector will not acquire and service sites themselves but they will provide units on serviced sites.	See Fort William MU sites commended changes above. Each major village has land allocated that could accommodate business proposals either via the mixed use allocations or more generally within the SDA. The Plan's Vision supports enhanced recreational sailing facilities and specific allocations are made for this purpose within sites MU2 and MU10. Similarly the expansion options for Fort William provide more than adequate land for relocated facilities. The Scottish Government's decision not to include any significant improvement scheme for the A82 within the STPR makes a lobbying policy less relevant.

Trunk Road Authority Issues	Transport Scotland objection to all allocated sites that take access off the trunk road network or will affect the network. Offer further discussion but maintain global objection unless sites deleted, access arrangements amended to only allow direct access from the local road network, or wording added to makes sites dependent upon Transport Scotland approval of developer funded transport appraisals and a Scottish Government funding commitment to any consequential trunk road network improvements.	NO COMMENDED CHANGE. Transport Scotland's suggested additional developer requirements are so onerous that they would stymie the development potential of most sites. Local road network access is taken wherever possible but many settlements have little option but to take access from the trunk road network. The recent STPR publication clarifies that most routes will not get a Scottish Government funding commitment within the lifetime of the Plan so agreeing to such a dependency in the wording would effectively embargo development on many sites.
Crofting General	Objection to lack of policy to embargo development on locally important croft in bye or arable farmland.	NO COMMENDED CHANGE. The Plan makes several policy references to the importance of croft land quality in planning decision making. It is therefore flagged as an important and material planning consideration. However, an absolute safeguard would not be appropriate or enforceable and would preclude diversification proposals that may sustain existing crofting activities.
Safeguarding of Village Centre Sites for Local Elderly Housing	Objection to lack of land safeguard for extra care sheltered housing for local elderly in every village.	allocations make reference to accommodation suitable for the elderly. An embargo on other forms of housing development would be difficult to enforce without a change in current national legislation / guidance.
Appropriate Assessment General	Request that for sites where particular development proposals could have a significant adverse impact on Natura sites, that such developments be precluded by the terms of the policy.	ADD sentence to developer requirements box "proposals will only be supported if developers can demonstrate no adverse effect on the integrity of the adjoining Natura site" to the allocations at Dunvegan pier (MU3), Kyle Harbour (MU4), Broadford airstrip (MU5) and Kyleakin quarry (I)

GENERAL POLICIES (See Sutherland Local Plan Appendix for Generality of Commended Changes & Summary Responses)

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
GP1 SDAs	Policy should refer to LCAs and “landscape character” should be added within the wording of the policy	ADD suggested policy wording and justification.
GP2 Development Factors and Developer Requirements	Inconsistency between terms “development factors” and SDA “objectives	AMEND to ensure consistency.
GP3 Wider Countryside	Preamble should cross reference LCAs Suggested modifications to better support renewables.	ADD suitable cross reference to LCAs
GP4 Natural Built and Cultural Heritage	Objection to omission of national test wording for SSSIs, NNRs and NSAs Suggested modifications to better support renewables.	See Sutherland Local Plan Report.
GP6 Designing for Sustainability	Suggested modifications to better support renewables. Suggested modifications to better support disabled access.	NO COMMENDED CHANGE. The disabled access policy issue would best be addressed through the forthcoming Highland wide Local Development Plan given its strategic nature. At the local level, the new design and access statements for larger developments will provide the most appropriate vehicle to test and improve the acceptability of proposals
GP7 Waste Water Treatment	SEPA objection unless new wording to support general principle of discharge to land and developer to pay for any private solution to be “Scottish Water-ready”. Want public sewer connection for all sites where feasible to connect.	See site-specific amendments in area sections above.
GP8 Waste Management	See Sutherland Local Plan Report	See Sutherland Local Plan Report
GP9 Flood Risk	SEPA objection unless developer requirement wording amended for various sites. Want pre-confirmation flood risk assessments for Fort William MU10, Roybridge B1, Portree MU3 and Portree MU5.	AMEND developer requirements / site boundaries as follows: ADD “flood risk assessment will be required, built development to avoid flood risk area” for sites adjacent to 1 in 200 year risk area.

	Glencoe H1 & B1 - want clarification that developer requirement relates to road drainage not flood protection.	ADD as above plus “only water-related or harbour uses would be acceptable within flood risk areas” for sites that fall (partly) within the 1 in 200 year risk area. REDUCE site boundaries for non water related use allocations to exclude 1 in 200 year risk area unless flood prevention works are also proposed. AMEND Glencoe sites to clarify developer requirement for “coastal/road protection works” Pre-determination rather than pre-confirmation assessments are sufficient.
GP10 Physical Constraints	Objection to reference to 1km set-back from wind generators because no Government support for this distance being used as a development embargo.	NO COMMENDED CHANGE. The policy lists constraints and asks for appropriate consultation and mitigation. It does not carry an automatic negative policy presumption.
GP15 Developer Contributions	Objection to lack of certainty as to the when, why and how much will be sought. Fear this will discourage investment. Request for specific reference to reduction if abnormal developments costs apply on a certain sites. Theatres Trust want policy to secure developer contributions for leisure uses such as theatres. Objection from renewables company that the policy should clarify that it does relate to nor seeks community benefit.	AMEND policy to allow for reduction if exceptional / abnormal development costs can be demonstrated by open book accounting. An across the board reduction would not be appropriate given that contributions are sought to address deficiencies created or magnified by developments. The detail requested will be provided through THC’s forthcoming Supplementary Guidance on this issue. Theatres are semi-commercial operations that do not justify planning gain contributions particularly because there is no direct connection with the physical environment or the impact of a particular development proposal.
GP17 Commerce Commerce Centres	Objection to lack of detail on function of each scale of centre because potentially misleading. Policy should set out quantitative and qualitative requirements in more detail in accordance with national planning guidance. Only the mixed use core of each centre should be identified. Theatres Trust want policy to safeguard as well as	NO COMMENDED CHANGE. The policy offers adequate policy coverage in this area. National planning policies are being streamlined to be less prescriptive. THC’s policy is in line with this trend. The scale and function of each centre should be commensurate with the population served and the aims of minimising travel but maximising accessibility. In a rural area many settlements (in particular those that

	encourage new leisure uses such as theatres.	originated as dispersed crofting townships) do not have a defined core. A wider presumption in favour of small scale retail, leisure and other commercial uses is therefore appropriate. Theatres and other leisure use sites may be capable of redevelopment or relocation and therefore an absolute safeguard would not be appropriate.
GP18 Design Quality and Place-Making	Request for policy to cover protection and provision of public open space. Reference to Circular 7/2007 that requires notification to Scottish Ministers if proposed loss of public open space safeguarded in a local plan.	NO COMMENDED CHANGE. THC has adequate policy coverage in this area through its supplementary guidance and the safeguarding policies within the Plan. To preclude development proposals that may offer better relocated facilities would not be appropriate. THC's open space notation is aimed at safeguarding cherished public open spaces that should never be built on because of their heritage, amenity and recreational value.
Other missing/suggested new GPs	Request for general policy to safeguard all sports pitches from development. Request for policy to secure developer contributions towards new sports pitch provision. Request for better biodiversity policy coverage.	NO COMMENDED CHANGE. See GP18 answer above. The Highland wide Local Development Plan and future supplementary guidance will address the issue of contributions and biodiversity in greater detail but the Fort William developer contributions table does make specific reference to sports pitch requirements.
Watercourses	SEPA want general developer requirement for retention and integration of watercourses as natural features within listed development sites	ADD developer requirement for "retention and enhancement of natural watercourses" for listed sites

ENVIRONMENTAL REPORT (ER) - STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

New Issues / Existing Issues Attracting New Grounds of Objection	Summary of New Grounds of Objection	Commended Changes & Summary Response
General	Request for factual updates, better baseline data e.g. no. of SAMs, need to match scoring matrices to changed general policies, all matrix mitigation should be followed through into the allocation developer requirements, want more on cumulative and residual effects, need for stronger policy on habitats and species, better and fuller cross-referencing of other relevant policies and documents.	ADD developer requirements where inconsistent approach between sites to same mitigation need. The scoring matrix will be updated to reflect the Examination outcome on the general policies. Cumulative and residual effects have been mentioned but a more detailed analysis is outwith the scope of current resources. Further policy coverage on species and habitats will be provided through the Highland wide Local Development Plan. Further cross referencing is not appropriate to a streamlined plan format.