

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

Reference Number:	<b>HWLDP-MIR-78</b>
Organisation/Individual:	RSPB Scotland (Stuart Benn)

**Action:**

Immediate Response Required	<input type="checkbox"/>
Meeting required with Respondent	<input type="checkbox"/>
Issue for Area Local Development Plan	<input type="checkbox"/>
Further Information Required	<input type="checkbox"/>
Other (Please Specify)	<input type="checkbox"/>

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

**Issues Raised in Response:**

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

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

**Key:**

<b>Background</b>	<b>Spatial Strategy</b>	<b>Policy Options</b>	<b>Consultation</b>
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**Notes:**

<p>Comments that the vision on page 4 underplays the importance of safeguarding the environment General comments on Inverness expansion, A96 corridor development, Renewables and Flooding</p>
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Action Sheet Completed by:	GW
Date:	8/12/09



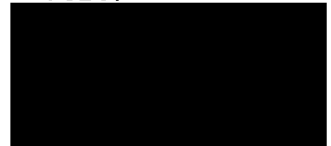
for birds  
for people  
for ever

Director  
Planning and Development Service  
Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

H.C. PLANNING AND DEVELOPMENT SERVICE		
02 NOV 2009		
PASS TO	INITIALS	DATE
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FILE REF:		

RSPB Scotland

North Regional Office  
Etive House  
Beechwood Park  
Inverness  
IV2 3BW



29 October 2009

Dear Sir

**Highland wide Local Development Plan – Main Issues Report**

RSPB Scotland welcomes the production of this report and knows how important it will be in shaping the nature of Highland and how it functions over the coming years. The RSPB is the charity that takes action for wild birds and the environment. As the largest wildlife conservation organisation in Europe, we have over one million members of whom over 82000 live in Scotland. Within the Highland Council area, we own or manage 40000 hectares of land for nature conservation on 20 reserves including the two largest in the UK at Forsinard and Abernethy.

We believe that sustainability should be at the heart of decision-making. The RSPB’s policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues, the RSPB’s professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including regional planning, development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year relating to its own reserves and estate.

We found the Report’s layout useful whereby an explanation of the issues is followed by a series of questions. Not all the questions were relevant to our organisation so we have only answered those that coincided with our areas of interest.

**Vision – Safeguarding our Environment**

We were disappointed with the aspiration - ‘To make sure the quality of the natural, built and cultural heritage in Highland is protected and where possible enhanced’ – which, in our view, seriously underplays the importance of this issue. This lack of vision and ambition is carried through to the Safeguarding our Environment section which is extremely short in relation to the majority of the other areas covered and whose



language compares unfavourably when measured against, for example, the opening sentence pertaining to Crofting and Agriculture (p64).

It appears that 'the environment' is considered to consist solely of discrete protected areas. In reality, the widest definition is pertinent and a healthy functioning natural environment is essential to people's wellbeing, helps to drive the economy and provides valuable support through ecosystem services - this should certainly be given wider recognition. Some of the Highland's natural environment is indeed outstanding but much is also degraded and in poor condition and there is huge potential to restore both habitats and species at a landscape scale with consequently huge benefits. So, whilst there is certainly a need to protect habitat fragments and their potential connections from competing development priorities, there also needs to be a shift in thinking to enable restoration both for its own sake and to enable habitats and species to shift their distribution in response to climate change.

#### **Inverness Expansion, A96 Corridor Development, etc.**

We accept the rationale for these developments and will comment in more detail once specific proposals come forward. However, we consider that this Development Plan should encourage developers to incorporate existing or new biodiversity assets within their design proposals. Features such as bird nest boxes (including for swifts) and bat boxes are easy to accommodate in new building construction and can bring huge wildlife benefits. As well as benefiting a wide range of wildlife, green roofs have a wide range of other benefits including reducing heating and cooling bills and slowing storm water runoff. Finally, planting schemes utilizing native species and wetland features bring major additional benefits.

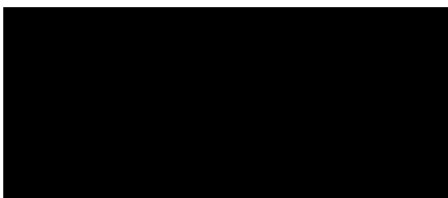
#### **Renewables**

RSPB Scotland believes that climate change is the single biggest threat to people, wildlife and the environment and is therefore a key topic that needs to be addressed as part of the Local Development Plan and in the more detailed documents to follow. RSPB Scotland supports the Scottish Government's ambitious target to reduce greenhouse gas emissions by 80% by 2050 and believes that the LDP should look at how it can contribute to this target. The LDP should look at options that balance the requirements of housing and economic growth with a reduction in carbon emissions through, for example, the promotion of zero-carbon developments.

#### **Flooding**

The new Flood Risk Management (Scotland) Bill introduces a framework for the sustainable management of flood risk, by which a range of options, including natural flood management, must be considered with the aim of finding the most sustainable options. Whilst the Bill has not yet been enacted, and it may take time to come fully into force, we believe that in the spirit of the new legislation, the LDP should look towards more sustainable options for the management of flood risk.

Yours sincerely



Stuart Benn  
Conservation Officer, South Highland