

Appendix 1 – Responses to Comments on the Environmental Report (April 2012) and, Environmental Report Addendum (May 2013) and Revised Environmental Report

This appendix sets out how comments on the Environmental Report have helped to shape the Finalised Environmental Report.

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Comments on the Environmental Report (April 2012)

Historic Scotland

Comment	Response
<p>I have reviewed the Environmental Report on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. It therefore focuses on the environmental assessment, rather than the contents of the guidance. Our comments on the Main Issues Report itself will form part of the Scottish Government's response to the Council. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the MIR.</p> <p>I welcome that the comments we provided on the Scoping Report on 7 March 2011 have been taken into account during the preparation of the Environmental Report. I also welcome the continuing engagement throughout the development of the Main Issues Report (MIR) and its assessment.</p> <p>The Environmental Report represents a detailed assessment focused mainly on the site appraisal of the spatial strategy. I am content to agree with the findings of the majority of these assessments but note that a number of small number of the site assessments have not identified potential effects on the historic environment. Given the important role played by the assessment in identifying and suggesting mitigation for potential effects it is key that this information is accurate in order for the assessment to influence the final decision making regarding the spatial strategy and its method of</p>	<p><i>Comments are noted and through the preparation of the Revised Environmental Report will be addressed.</i></p> <p><i>With regard to the suggested monitoring indicators, it is considered that these would fit with the approach to monitoring which we are seeking to bring forward and as such we will bring these forward in the Monitoring Section of the Revised Environmental Report.</i></p>

<p>delivery. I have therefore included details on these omissions in an annex to this response.</p> <p>As noted above, our response to the MIR through the Scottish Government focuses on the spatial strategy and I would refer you to those comments with regard to the mitigation of effects. For the most part these comments are in line with the findings of the assessment. However, it is important that the site assessment influences not only site selection but site delivery. In this regard the mitigation suggested by the assessment should be brought forward into the Proposed Plan through developer requirements for the delivery of each site. To this end I would suggest that the link between the assessment and the spatial strategy is clearer within the delivery advice accompanying the spatial strategy at the next stage.</p> <p>I note that the monitoring indicator for the cultural heritage relates to reducing the number of buildings at risk. While this is to be welcomed you may wish to consider additional monitoring indicators that report on both those effects on the historic environment predicted in the assessment as well as the overall effects of the plan on this resource. In this regard I welcome the conjoined approach with the Highland Wide LDP but would suggest that effects on the historic environment through the implementation of the Inner Moray Firth spatial strategy are monitored through the inclusion of a monitoring indicator such as “the number and outcome of planning applications where scheduled monuments are significantly affected”.</p>	
<p>Inverness C2 Reference should be made to the need to consider the setting of the adjacent scheduled Caledonian Canal.</p> <p>Inverness H49 (Misprinted as H48 within Appendix 5) While noting the proximity of Leys Castle and its designed landscape the assessment omits the adjacent scheduled monument Druid Temple Farm,</p>	<p><i>All of the issues raised will be addressed in the Revised Environmental Report.</i></p>

<p>chambered cairn and stone circle 230m WSW of (Index no. 2417) in close proximity to northern boundary of allocation.</p> <p>Inverness H55 The assessment should have considered the impact on the scheduled monument Ashton Farm Cottages, ring ditch 415m SW and pit circles 460m WSW of (Index no. 11535).</p> <p>Castle Stuart MU1 The assessment has not identified or considered that the western section of this allocation contains the scheduled monument Newton of Petty, settlement 350m WNW of (Index no.11835).</p> <p>Cromarty H1, C5 These site are wholly within the Cromarty House Inventory Designed Landscape</p>	
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Scottish Environment Protection Agency

Comment	Response
<p>We have used our scoping consultation response to consider the adequacy of the ER. We agree with the findings of SEA and welcome the clear way in which the SEA recommendations for further mitigation have been set out. In our response to the Inner Moray Firth Local Development Plan Main Issue Response we have enclosed a spreadsheet. Within this spreadsheet there is a column which highlighted where mitigation identified in the SEA has not been brought forward into the Main Issues Report. Much of this mitigation would be required to remove our objections relating to flood risk. This highlights the</p>	<p><i>Noted. These comments will be addressed through the preparation of the Proposed Local Development Plan</i></p>

<p>importance of the SEA and the role it has in informing your choices regarding allocations.</p>	
<p>As the Inner Moray Firth Local Development Plan is finalised, Highland Council as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.</p>	<p><i>Noted.</i></p>
<p>We note that in the table in Appendix 2, under Water/Water Quality in Protected Areas there is a link to SEPA's 2006 water quality classification, and one to general classification page. These are pre-Water Framework Directive and both links are now redundant. The link to the most up to date classification is www.sepa.org.uk/water/river_basin_planning/classification_results_2010.aspx. In addition our River Basin Management Plan interactive map: http://gis.sepa.org.uk/rbmp/ shows the 2008 classifications along with details of the pressures/measures for each waterbody.</p>	<p><i>This will be revised and brought forward in an updated Appendix 2 to the Revised Environmental Report with the information informing any revised assessments as part of this document.</i></p>

Scottish Natural Heritage

Response	Comment
<p>This is a very comprehensive and thorough piece of work, and we would commend you for how environmental information collected at the Call for Sites stage has been able to inform the SEA.</p> <p>We have provided detailed comments in the Annex to this letter. Some of the key themes coming out of these comments are as follows –</p>	<p><i>Noted.</i></p>
<p>– In most cases the possible presence of protected species has not been specifically addressed, but instead reference is made to the need for a protected species survey at the application stage. Rather than assessing this as a ‘neutral’ effect on the environment, more realistically we believe the effect is ‘unknown’. The importance of a satisfactory mitigation or protection plan where protected species are present should be added, to avoid the plan having negative environmental effects</p>	<p><i>Noted. This will be addressed in the Revised Environmental Report</i></p>
<p>– We advise that in the case of badgers, cumulative assessment should be given further consideration. The cumulative assessment part of this SEA could we suggest be strengthened by focussing on a few key issues arising from the site-by site assessments, especially badgers and ancient/long established/semi-natural woodland</p>	<p><i>Noted. It is considered that the cumulative assessment looking at the overall cumulative impact of a range of development scenarios on the SEA Objectives is considered appropriate due to the scale of the plan. We will consider this revised approach for any future SEA.</i></p>
<p>– The threshold between a ‘minimal’ and a ‘significant’ negative effect could be reviewed, especially in terms of woodland. The scale of impact on inventoried woodland did not appear to make a difference to ‘minimal’ scores. Also some negative impacts on woodland and green networks appeared to be offset in the assessment by suggested mitigation (e.g. open space provision or woodland management plans), whereas the Council’s methodology is stated as</p>	<p><i>Noted. Due to the stage of the plan and the SEA, at this stage we feel it would be difficult to review the scoring system and the scoring thresholds but we will consider making the distinction clearer for future SEA work.</i></p> <p><i>The use of mitigation to offset impacts of sites prior to the assessment of</i></p>

<p>assuming no mitigation</p>	<p><i>the site was an error and these will be revisited.</i></p>
<p>- Linking SEA at this stage with Habitats Regulations Appraisal (HRA) is very important, so we would wish to see likely significant effects on European sites in terms of the Habitats Regulations mirrored in the SEA. This would be useful as a part of the early work on the HRA. In addition potential cumulative effects on European sites can be flagged up early within the cumulative assessment part of this SEA. Some examples of these are noted in the annex.</p>	<p><i>Noted. We consider this approach to be best practice and one which we will take forward in future SEA work. While this is the case the HRA has been twin tracked (as far as practicably possible) with the SEA to aid integration.</i></p>
<p>– Perhaps for the Revised Environmental Report, in the main part of the text, consideration could be given to a short piece of text for each of the site allocations in the Proposed Plan explaining if the SEA identified any significant negative environmental effects, and if so, what mitigation is included in the plan to reduce or offset this.</p>	<p><i>Noted. A section will be included in the RER on the significant negative environmental effects and how they are mitigated through the plan.</i></p>
<p>Relationship with other PPS and environmental protection objectives (pp17-61) Table 2 – Scotland Planning Documents – Please add reference to “Green Infrastructure: Design and Placemaking” document – http://www.scotland.gov.uk/Publications/2011/11/04140525/0</p> <p>Also add Policy on Control of Woodland Removal and associated guidance – http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Infrastructure/Energy-Consents/Guidance/Woodland-removal</p> <p>http://www.forestry.gov.uk/pdf/WRpolicyguidance17March2010.pdf/\$FILE/WRpolicyguidance17March2010.pdf</p> <p>Regional Planning Documents – Add Moray Firth Natural Heritage Futures Series (2002 and 2009 update) – http://www.snh.gov.uk/about-snh/what-we-do/nhf/nhf-byla/document/?category_code=NHF&topic_id=1429</p>	<p><i>Noted. These will be included and given due consideration in the Revised Environmental Report.</i></p>

<p>Add reference to the Council’s Badger Protection Guidance Notes (PGN) - http://www.highland.gov.uk/yourenvironment/planning/developmentplans/developmentplanpolicyguidance/Otherplanningguidance.htm</p>	
<p>Current State of the Environment (pp62-69)</p> <p>Biodiversity, flora and fauna –</p> <ul style="list-style-type: none"> ☐☐Badgers should be discussed – see Council’s own Badger PGN ☐☐Wild deer should be mentioned ☐☐pp 62-65: this is a list of the UKBAP priority habitats and species – however, can it be made more specific to the plan in question? For example could some discussion focus on any habitats and species of particular note in the plan area (e.g. badger, great crested newt)? ☐☐Green networks should be discussed here <p>Soil –</p> <p>Some further information on the location of carbon rich soils can be found on our website – http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soilsrocks-and-minerals/soils-and-development/</p> <p>However there is no discussion here at present about soils in terms of land capability for agriculture (e.g. ‘prime’ land) and this would appear to need to be covered here in the context of this plan area.</p> <p>Water –</p> <p>The designation of the Moray Firth as a Special Area of Conservation (SAC) would merit mention here.</p> <p>Climate Change –</p> <p>Some greater discussion on sea level rising would seem necessary here, given</p>	<p><i>Noted. The suggested modifications will be made to the Revised Environmental Report for completeness.</i></p>

<p>the geography of this plan area.</p> <p>Landscape – The National Scenic Areas wholly or partly in the plan area (e.g. Glen Affric NSA) should be mentioned here.</p> <p>Environmental Problems (pp70-72)</p> <p>Biodiversity, flora, fauna – Suggest also discuss - <ul style="list-style-type: none"> ☐☐ Cumulative impact on badger and wild deer ☐☐ Loss of woodland (ancient/long established/semi-natural) ☐☐ Impact on green networks ☐☐ Indirect effects on designated sites </p> <p>Human health – Suggest also discuss - <ul style="list-style-type: none"> ☐☐ Active travel opportunities </p> <p>Soil –</p> <p>Suggest also discuss - <ul style="list-style-type: none"> ☐☐☐ Carbon rich soils ☐☐ Good quality land (NB: mitigation column refers to waste rather than soils)</p>	
<p>Likely significant effects (pp74-93) Please see detailed comments below under Appendix 5. We agree that assessment should be carried out assuming no mitigation. So on occasions we have queried where a ‘neutral’ score has been assigned on the assumption of mitigation, suggesting instead the likely significant effect should be identified, followed by mitigation.</p>	<p><i>See above comments in response to the issues raised.</i></p>

<p>We wonder if the threshold between a ‘-’ (minimal) and ‘- -’ (significant) effect is clear enough. In particular sites that would involve the loss of woodland on the ancient woodland inventory (of whatever scale of magnitude) may be assigned only a ‘-’ score and so are not considered further than the site specific level. This is despite the protection afforded to such woodland by the Control of Woodland Removal Policy and the Council’s own policy. We suggest consideration is given to a threshold between minimal and significant effect based on whether it is of national or local/regional importance and the size of woodland affected (plus see comment below re cumulative effect).</p> <p>In order that the SEA can provide an initial consideration for the Habitats Regulations Appraisal, we recommend that sites likely to be screened in as having a likely significant effect on European sites are scored here as ‘-’ or ‘- -’.</p>	
<p>Cumulative assessment (pp94-96) It is unclear how cumulative effects can be mitigated on a ‘site by site [basis]’ (pp94-96) – does it not require consideration beyond the individual level? Key cumulative impacts in terms of the natural heritage of this plan are we suggest likely to be on badger and wild deer habitat, loss of ancient/long established/semi-natural woodland, the international designations of the Inner Moray Firth, and on landscape setting around Inverness. See also comments below under Appendix 6.</p>	<p><i>The meaning of the site by site mitigation will be clarified in the Revised Environmental Report. Essentially it is suggesting that the site by site mitigation will also cumulatively have an effect.</i></p> <p><i>See comment above regarding consideration of further issues in terms of the cumulative assessment.</i></p>
<p>Compatibility with other PPS (pp97-98) It is unclear why this section is here – we suggest this is better located when all other PPS are being considered (Table 2).</p>	<p><i>Noted. This section will be moved.</i></p>
<p>Mitigation measures (p99) These should be set out in developer requirements in the Proposed Plan. For sites requiring assessment through the Habitats Regulations Appraisal, further mitigation is likely to be identified through this process.</p>	<p><i>Noted.</i></p> <p><i>Where mitigation is suggested in the SEA it will be carried forward to the</i></p>

<p>Where mitigation for biodiversity is stated as a protected species survey, this should be followed by a mitigation/protection plan if protected species are present. This should potentially consider cumulative impact for badgers in the Inverness area.</p> <p>Mitigation for loss of woodland is variously stated as for example ‘minimise loss of trees’, ‘woodland management plan’, or ‘compensatory planting’. We would welcome greater clarity for this, given that woodland in question includes that in the ancient woodland inventory, which has policy protection elsewhere. For example, in some cases it would seem possible to amend the allocation boundary to exclude the woodland area. Elsewhere where compensatory planting will be required, some parameters for this could be set out, e.g. it should significantly enhance the green network.</p>	<p><i>plan and similar wording to that suggested will be included.</i></p> <p><i>With regard to woodland mitigation. The Plan must be read alongside and considered against all relevant legislation, policy and guidance and any application will be judged against this. While this is the case these will be considered individually to further consider mitigation in the plan process.</i></p>
<p>Monitoring (pp100-103) References to HwLDP should be amended to refer instead to IMFLDP. Biodiversity – – Suggest amend monitoring to applications affecting designated areas rather than within them – Protected species monitoring could also include applications granted that require a licence – Planning permissions requiring compensatory tree planting can be added – Applications with green network components secured through masterplan, detailed design layout, developer agreement etc Landscape – – Quality of design statements; implementation of design plans; landscaping schemes undertaken</p>	<p><i>The suggested wording is welcomed and will be incorporated into the monitoring section of the Revised Environmental Report.</i></p>
<p>Appendix 1 – Response to scoping comments No comments (thank you for giving careful consideration and attention to our comments at the scoping stage)</p>	<p><i>Noted.</i></p>

Appendix 2 – Baseline Information Data and maps

These are at the pan-Highland level rather than the plan level, so it is important that the most relevant for the Inner Moray Firth area are as comprehensive as possible.

Climatic factors – the coherence of the green network could be included here

Soils – we suggest reference is added to carbon rich soils – has the Council access to soil data from the James Hutton Institute? Some Scotland-level spatial data is available in SNH Information Note on carbon rich soils – see - <http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soilsrocks-and-minerals/soils-and-development/>

Landscape – the Special Qualities Reports for National Scenic Areas should be referred to as important baseline data for the safeguarding of these areas – <http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/nationaldesignations/nsa/special-qualities/>

The extent of Highland’s Special Landscape Areas should be added here, along with links to their citations.

For wild land, reference can be made both to SNH’s Search Areas for Wild Land, and to the more recent map of the presence of qualities of wildness – <http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policyand-guidance/wild-land/mapping/>

Coast – can reference be made here to the coastal classification in the Council’s Coastal Development Strategy (i.e. percentage of developed, undeveloped and isolated coast)?

Impact of windfarms – SNH’s visual indicator of built development and land use change is not just in respect of windfarms, but built development (e.g. includes overhead power lines). If you are able to run similar data yourselves, you may be able to calculate percentage visibility for more accurate baseline and monitoring purposes.

Noted. Where The Council can access the information the Environmental Baseline will be updated and considered in the preparation of the Revised Environmental Report.

<p>Biodiversity – the number and extent of designated sites could be stated for the IMF LDP area rather than for the Highland area as a whole Data source for wider biodiversity is the NBN Gateway - http://data.nbn.org.uk/</p> <p>Green network – reference should be made to spatial data in the Council’s Supplementary Guidance</p> <p>Maps – We recommend further maps can be included for –</p> <ul style="list-style-type: none"> – Local Nature Reserves (listed in contents page but not included) – Special Landscape Areas – Qualities of Wildness (see recent data provided by SNH) – GCR Sites 	
<p>Appendix 3 – Alternatives to which SEA was applied No comments (factual – taken from the Main Issues Report)</p>	<p><i>Noted</i></p>
<p>Appendix 4 – Vision, Spatial Strategy and Policy Assessments Other Settlements The preferred approach sets out a number of criteria for the consideration of development proposals in the smaller settlements of the plan area. However it is unclear how this also allows for consideration of issues dealt with by policies in the Highland wide LDP. For example there is reference in this preferred approach to possible adverse impact on locally important heritage features, but what about nationally and internationally important heritage features too? Development at Invermoriston for example could affect the River Moriston SAC.</p> <p>It is unclear why the mitigation section of this assessment considers this is a matter for the review of the HwLDP in 2015. Given this is an additional proposed policy in the IMFLDP, any mitigation should be possible in terms of amendments to this emerging policy, e.g. additional criteria to include, or</p>	<p><i>Noted. With regard to the application of the policy and how it will work, please see the “Summary of comments and recommended responses” on our website.</i></p> <p><i>The mitigation wording will be revised for accuracy and clarity The revision of the HwDLP is also relevant to this policy due to the overlap of consideration of some of the criteria being covered by policies of the HwLDP as well as the Other Settlements Policy.</i></p>

<p>removal of specific settlements from here and inclusion of them instead as more detailed settlements in the plan.</p>	
<p>Housing in the Countryside With regard to the ‘contraction’ option, the area identified for possible contraction (south of Dores to Farr) includes both international (Special Protection Area – Loch Ruthven and Loch Ashie SPAs) and local (Special Landscape Area – Loch Ness and Duntelchaig SLA) designations. These are not mentioned in the assessment (objectives 1 and 16/17) With regard to the ‘individual hinterland’ options, we wonder whether the ‘neutral’ scoring for all but landscape adequately reflects the possible effects of the greater pressure for dispersed development that this option would open up – for example in relation to habitats and species.</p>	<p><i>Noted. This will be revisited for the Revised Environmental Report. It should however be noted that Housing in the Countryside Policy is primarily concerned with protection of the local landscape character and issues with regard to impact on the wider environment (including designated sites) is covered by other policies of the HwLDP.</i></p> <p><i>Consideration has been given to the effect of a greater dispersal of development if the individual hinterlands approach was taken forward. However due to the partner policy of the Housing in the Countryside policy (Wider Countryside) still requiring a sequential approach to be followed then it is not considered that it would be either positive or negative in that respect. This will be clarified in the SEA Assessment.</i></p>
<p>Special Landscape Area With regard to the ‘contraction’ option for the Drynachan, Lochindorb and Dava Moors SLA, the Carn nan Tri-tighhearnan area has wildness qualities, and so there may be a negative effect on SEA Objective 18. Also although not landscape-related the area is also designated SSSI and SAC.</p>	<p><i>Noted. This will be revised for the Revised Environmental Report.</i></p>
<p>Appendix 5 - General comments – 1. We feel the ‘=’ (neutral) scoring for protected species (Q2) is questionable given the SEA is simply saying that protected species may be present on the sites and that a survey will be required. So given it is unknown at this time, we suggest a ‘?’ (unknown) scoring for Q2 would be more appropriate. But where badger habitats would be affected, or other examples of more likely presence of a protected species (e.g. great crested newt) these could be scored as ‘-’ at least and referred to as such.</p>	<p><i>Noted. These comments will be addressed where they have been identified through the further detailed comments on Appendix 5.</i></p>

2. Scoring regarding green networks (Q3) has sometimes countered a loss re habitat with a potential gain re recreation, so leading to an overall '=' score. This juxtaposes two different functions of the green network, and it is not we suggest appropriate mitigation for important loss of habitat that a path is provided. Also sometimes a '+' (minor positive) score is given to an area presently contributing to the green network because it is anticipated that any development will incorporate GN features and to that extent no mitigation has been deemed necessary (e.g. MU16 Culduthel-Slackbuie, R11 Milton of Leys). This contradicts the opening note that the assessment assumes no mitigation and risks necessary mitigation not being explicitly included in the plan. However on the other hand sometimes such a situation results in a '-' score, which seems correct (e.g. MU28 Stratton) (although mitigation should be added), so there is some inconsistency. Also sometimes for Q3 a '=' score is assigned because existing woodland that would be lost would be replaced in some measure by open space within housing development. However this needs to be considered against the nature of the species currently relying on the woodland for movement as part of the green network.

3. The scoring for Q1 re biodiversity sometimes is neutral ('=') when woodland in the ancient woodland inventory would be affected. It would seem more appropriate for such environmental effects to result in a '-' score under biodiversity, or even '- -' if a certain scale or nature of such woodland would be affected.

4. Sometimes the proposed mitigation for negative effects is very general (e.g. "minimise loss"; "necessary mitigation"; "survey work") and it is unclear how this will influence the extent and nature of any allocation based on this (e.g. Inverness I2 Harbour Extension).

5. Sometimes the scoring where there would be a loss of woodland is '=' on the basis of compensatory planting as mitigation. Given the introductory notes to Appendix 5 state that site assessments are carried out assuming no mitigation, then it would be assumed in those cases that there would be a '-' score,

<p>followed by mitigation.</p>	
<p>Inverness Preferred/Non-Preferred Sites Croy – MU1 and H3 - re Q1 we advise this should refer to possible connectivity re water quality with Loch Flemington SPA</p> <p>Dores – H1 – re Q1 it is unclear how this is scored ‘=’ when it affects an area of woodland in the Ancient Woodland Inventory. Given the status of ancient woodland in the SPP (para 146) and the Control of Woodland Removal Policy, it would seem more appropriate to score this as ‘--’ based on area affected (6 ha); re Q3, again it is unclear how this is scored as ‘=’ in terms of the green network. Suggested mitigation of open space when this is presently ancient woodland (and hence functions as woodland in the green network) does not seem appropriate.</p> <p>Dores – C1 – re Q12 this site lies within a GCR Site – this has not been picked up here and implies a ‘-’ score at least.</p> <p>Drumnadrochit – H1 and H3 – re Q1 the connectivity with the Urquhart Bay Wood SAC via the River Enrick should be noted and considered as part of the HRA of the plan (potential hydrological impacts on the qualifying features) although not likely to be significant</p> <p>Drumnadrochit – H4 (also H6, although this is a non-preferred site) – re Q1 and Q3 this does not note that these areas are indicated as involving the loss of semi-natural woodland. This should affect the current ‘=’ scores for Q1 and Q3.</p> <p>Fort Augustus – re Q1 and Q3, MU2 and B1 are indicated as including semi-natural woodland</p> <p>Kiltarlity – H3 and B1 – re Q1, this notes the presence on the site of semi-natural woodland and scores ‘-’, but the proposed mitigation is then stated as minimising the loss of long-established woodland. It is unclear how this will be</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

achieved. Re Q3 (green network), as with other questions this is scored '=' even though woodland would be affected, so this is unclear – as is the proposed mitigation of creating open space in substitution for woodland.

Kirkhill – H5 - re Q1 and Q3 – this area is included within the Ancient Woodland Inventory (category 2b – LEPO) - so implies a '-' rather than a '=' scoring (re Q3).

Tomatin – H2 and H3 – re Q1 and Q3, these areas are within the Ancient Woodland Inventory (category 2b – LEPO) – see comments above re scoring and mitigation H6, H7 and MU3 (or MU4: map and text differ) – re Q1 and Q3 – as before see earlier comments for a site which is contained presently within the Ancient Woodland Inventory (category 2b – LEPO) – it is very unclear why a '=' score is given when the proposed mitigation is compensatory planting. The introductory notes say that all site assessments have been carried out assuming no mitigation. Mitigation for any negative effect on the green network partly depends on the location of any compensatory planting.

Inverness Airport Business Park – B1 – Q1 and Q3 acknowledges presence on site of woodland in the Ancient Woodland Inventory (category 2b – LEPO) and the need for appropriate mitigation; Q2 – badger habitat, so '-' scoring more appropriate

Tornagrain – MU1 – Q1 and Q3 – re woodland in Ancient Woodland Inventory on site (category 2b – LEPO), this would suggest a '-' rather than a '=' scoring; Proximity to Loch Flemington SPA and Kildrummie Kames SSSI should be recognised under Q1. Q2 – badger habitat, therefore a '-' scoring is we suggest more appropriate

Travellers Sites T1 and T2 at Dalcross – re Q1 it is unclear how no impact on the nearby Inner Moray Firth SPA is concluded, given the possible nature of use of the site. A '-' scoring would seem more appropriate. However for the part of the T2 site at Seafeld of Culloden the proximity to the Inner Moray Firth SPA

(adjacent at this stage) and the nature of possible usage would indicate a '- -' scoring.

Castle Stuart – MU1 - re Q1 it is unclear how no negative impact on the nearby SPA is concluded given the possible increase in recreational activity near the shore in combination with the proposed Coastal Trail – a '- -' score would seem more appropriate at this stage. Re Q32 it is unclear how it has been concluded that there would be no impact on landscape character given the present openness of the site and location between the road/railway and the Moray Firth

Whiteness – MU1 – re Q1 it is noted that this is in close proximity to SPA, SSSI and SAC to the north, and woodland on/to the south of the site, so it is unclear why this is given a '=' scoring rather than a '- -' scoring, given that the assessment assumes no mitigation.

I1 – re Q1 the site is partly within the SPA, SSSI, GCR site and SAC. It is therefore very unclear why this has been assigned a '=' score. Also the justification states that it is assumed that a business (renewables related) activity here would have no negative effect on the European designations, but the reasoning behind this is unclear. Re Q9 (open space) this is scored '++' on the basis that additional open space may be provided by this development, but given its proposed industrial zoning for heavy renewables-related work, this seems very unlikely – similarly for Q32 re landscape where a '+' score is given because “the uses proposed for the site are likely to increase enjoyment of the surrounding landscape by creating opportunities for recreational use”. This is unclear – how will an N-RIP site create opportunities for recreation? And how is this relevant to landscape character?

Inverness –

H2 Craig Phadrig – re Q1 this area is indicated as within the Ancient Woodland Inventory (category 2b – LEPO), so '=' score is unclear.

H20 South Kessock – re Q1 it would appear as though the site is within the Merkinch LNR boundary, so the ‘=’ scoring here is unclear.

H47 Milton of Leys – this appears to be a duplicate of H45-46 Balvonie of Inshes in the appendix;

H49 (Welltown of Easter Leys) (p557) – again this appears to be headed incorrectly (H48 Milton of Leys Neighbourhood Centre) – however re Q1 from a desk analysis the southern part of the area of scrub/woodland is mixed woodland, so the ‘=’ score here may need adjusting.

H71 (S of B9006 at Woodside of Culloden) – re Q1 from a desk analysis this area of scrub/woodland is semi-natural woodland, so the ‘=’ score here may need adjusting

H74c (Nairnside) – re Q1 from a desk analysis semi-natural woodland should be considered

MU16 Culduthel/Slackbuie – re Q32 this says ‘May have significant impact upon local landscape’ and yet is scored ‘=’; from the text it would be assumed this would have a ‘-’ score.

MU20 and MU21 Longman landfill area – re Q1 as well as proximity to SAC note also presence of semi-natural woodland on some of the site, accentuating the ‘-’ scores for these two sites on biodiversity grounds.

MU30 Milton of Culloden and MU31 Balloch – re Q32 (landscape) it is noted here that “Site may have a significant impact on landscape, highly visible from A96(T)” or “Site may have a significant impact on landscape and result in coalescence of separate communities” but they are scored ‘=’. A ‘-’ score for both these sites seems to be implied from the text.

B6 Milton of Leys – re Q1 from a desk analysis western-most part includes an

area of seminatural scrub/woodland

B8 University Campus – re Q1 the proximity to the Inner Moray Firth SPA should be referred to here as well as the Moray Firth SAC

B9 Retail and Business Park – re Q1 please note shoreline is SPA as well as SSSI, so potential HRA issue, although business rather than housing use is relevant.

I1 Carse – this appears to have been omitted from the tables - re Q1 the Merkinch LNR lies adjacent to the site and it is in proximity to the Moray Firth SAC

I4 Longman Landfill – re Q1 the presence of semi-natural woodland on this site as well as the close proximity to international designations should be noted here; re Q32 it is unclear how a '=' score has been assigned here and a conclusion re unlikely adverse impact on local landscape given proposed use, especially given possible "taller structures" noted in the text, in the light of the Inverness District LCA ('sense of openness and exposure') and the Inner Moray Firth LCA ('natural coastline and landscape between industrial areas [helps] to act as visual and physical buffer areas'). A '-' score would seem more appropriate

T2 Old A96 – re Q1 the adjacency to the SPA/SSSI combined with the possible use would point to a '- -' rather than a '-' score; re Q32 there may be a negative impact on key views from the railway line across the Moray Firth

R6 Inverness East – re Q3 on green networks, this has been narrowly assessed against the greenspace audit rather than more widely assessed against green networks as per the supplementary guidance.

C13 Ashton Farm and C14 North of Culloden Academy – re Q1 the proximity to the Inner Moray Firth SPA/Ramsar site should be considered here, especially if these possible recreational areas have links to the proposed Coastal Trail

<p>Nairn Preferred/Non-Preferred Sites -</p> <p>MU1 Delnies – re Q1 reference should be added to the proximity to the Inner Moray Firth SPA. Recommend scoring is ‘-’ so that mitigation of Recreational Access Management Plan follows on from this. Re Q32 (landscape), given it is noted in the text that there would be a material change in landscape character, it is unclear why this has been assigned an ‘=’ score. A ‘-’ score would seem more appropriate, with mitigation then set out as per for example the Inner Moray Firth and Moray & Nairn LCAs.</p> <p>MU2 Sandown – as above re Q1 and Q32</p> <p>MU4 Nairn South – as above re Q32 (within the Coastal Farmlands LCA per the Moray & Nairn LCA – see under ‘Urban Expansion’ on p71)</p> <p>MU5 Nairn South (later phase) and MU6 (Househill) – re Q32 these are answered differently to</p> <p>MU4 which seems inconsistent – it is recommended that the approach for MU4 is also used for MU5 and MU6</p> <p>H1 Fort Reay – re Q1 this should also refer to the Inner Moray Firth SPA/Ramsar. Also reference should be made here to site including semi-natural woodland. This we suggest points to ‘-’ rather than ‘=’ score. We recommend mitigation should be added re the woodland. Re Q9 this refers to this being a mixed use development whereas it is a housing development. However it is hoped that the Council’s Open Space in New Residential Areas Policy applies to both Housing and Mixed Use Allocations. Re Q32 see above under MU1</p> <p>H2 Achareidh – re Q1 this should also refer to the Inner Moray Firth SPA/Ramsar. Also reference should be made here to parts of the site being mixed woodland. This we suggest points to ‘-’ rather than ‘=’ score. We recommend mitigation should be added re the woodland. Re Q2 a protected</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>
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<p>species survey may also be needed for bats and red squirrels. Re Q9 see comments under H1.</p> <p>H4 West of Firthside – re Q1 the Tree Preservation Order noted in the MIR is not discussed here. Re Q32 we suggest there is a need to consider any views over the site from the road and from the popular path on either side</p> <p>H6 Lochloy – re Q1 the proximity to the Moray and Nairn Coast SPA should be referred to here.</p> <p>H7 Kingsteps – this has been omitted – under Q1 needs consideration of proximity to Moray and Nairn Coast SPA</p> <p>Cawdor – MU1 – re Q1 the proximity to Cawdor Wood SAC has not been picked up here, nor the requirement as set out in HwLDP for a Recreational Management Plan – this should be reflected here</p> <p>B1 – re Q1 this should reflect the area of woodland in the SE part of the site which is seminatural woodland</p>	
<p>Ross and Cromarty East Preferred/Non-Preferred Sites - Alness – H10 Coulhill – re Q1 it is stated that this is cleared woodland, but in other questions (Q4, Q24, Q32) it is stated that this is within woodland. So it is unclear whether woodland would be affected by any development here. This is an area included in the Ancient Woodland Inventory (category 2b – long established of plantation origin)</p> <p>Avoch – Site B2 (harbour) does not appear to have been assessed. Re Q1 this is likely to need consideration with regard to proximity to the Moray Firth SAC, subject to anticipated activity</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

I1 - re Q1 this is scored '±' in terms of no anticipated effect on the nearby Moray Firth SAC, but this should also be included in the HRA.

Barbaraville –

H1 – re Q1 this is scored '±' in terms of no anticipated effect on the nearby Cromarty Firth SPA, but this should also be considered as part of the HRA. In particular given Q4 has been answered '+' (enjoyment related to the natural heritage) this is rather contradictory to Q1 because it implies possible increased recreational activity close to the SPA

Maryburgh –

MU3 – re Q1 this should note and assess the proximity to the Conon Islands SAC/Lower River Conon SSSI

Conon Bridge –

MU2 – re Q1 this notes the proximity to the Conon Islands SAC/Lower River Conon SSSI and scores it '±' in view of mitigation; given introductory note to Appendix 5 we suggest the preferred procedure would be to score it '-' and then apply mitigation as a result of an identified likely significant effect

Contin –

H5 – re Q1 as well as proximity to the SAC/SSSI from a desk analysis this site may also contain a small area of semi-natural woodland

Cromarty –

H5 and H6 and C8 – re Q1 the proximity to the Rosemarkie to Shandwick Coast SSSI should also be noted

H7 – this appears to be missing

Culbokie –

H6 – re Q1 given this is in Culbokie Wood (part of Ancient Woodland Inventory

– category 2b - LEPO) it is unclear why this has been assigned a '=' rather than a '-' score

Dingwall –

MU3 – re Q1 it is unclear what 'woodland management plan' means in the context of mitigation for the woodland on this site.

Evanton –

H8/I6 Newton Road – re Q1 from a desk analysis this should consider the semi-natural woodland presently on the site, which may lead to a '-' score

I1 Industrial Estate – re Q2 this is scored '=' but given it is stated in the text that protected species are known to occur on this site, it would seem to be more appropriate to assign this a '-' score (as for I4)

Fortrose/Rosemarkie –

H4, H5, MU2 and MU3 – re Q32/33 it is suggested that as well as impact on SLA the '-' score should note the location of these sites in open land between Fortrose and Rosemarkie (see 'Significant Cons' text in MIR itself)

C1 does not appear to have been assessed

Invergordon –

I5 North of Service Base and I6 Service Base – re Q1 given locations partly within the Cromarty Firth SPA/Ramsar/SSSI a '--' rather than '-' score would seem to be justified (given that the '-' score is used elsewhere when sites are close to a designated area – e.g. I7 Delnies). Depending on the nature of the possible development here, it is unclear what 'management plan' means in terms of mitigation for all of I5, I6 and I7

Kildary –

B4 – re Q1, if a tourism/leisure use is proposed, possible indirect effect on Morangie Forest SPA should also be noted here (as well as Pitmaduthy Moss

SAC)

Muir of Ord –

H6 Ardnagrask – re Q1 this identifies this area is mixed woodland but assigns it ‘=’ rather than ‘-’. Furthermore no mitigation is included.

H9 Chapeltown West – re Q32 it is unclear why this is ‘=’ rather than ‘-’ given from a desk analysis semi-natural woodland is present on site.

MU3 Tore Road North – re Q1 this should also consider the presence of semi-natural woodland on the site. Re Q2 (species) we recommend this should be scored ‘-’ (great crested newt) rather than ‘=’ in this case

I1 – re Q1 the expansion area to the east includes some plantation/mixed woodland, which should be noted here

North Kessock –

B1, H1, H2, H3 – re Q32 (landscape) this is assessed simply in terms of landscape designations rather than also wider landscape character and visual impact issues, which we suggest are likely to be relevant for this settlement opposite Inverness and overlooking the Beaully Firth

Munlochy –

H6 – re Q1 the proximity to the Inner Moray Firth SPA and Munlochy Bay SSSI should be noted and considered here. Re Q12 (geodiversity) the site is partly within the Munlochy Valley GCR Site and so we recommend should accordingly be scored at least ‘-’, given possible housing use

MU1 - re Q1 the proximity to the Inner Moray Firth SPA and Munlochy Bay SSSI should be noted and considered here.

Seaboard –

H8 – re Q1 given the slight overlap with the Rosemarkie to Shandwick Coast SSSI it is suggested this should be scored ‘-’ rather than ‘=’

Strathpeffer –

H2 – re Q2 (species) given proximity to Loch Kinellan this should be scored ‘- -’ with suitable mitigation then considered H3 does not appear to have been assessed

Tain –

B1 and I1 – re Q1 and proximity to SAC/SPA/Ramsar/SSSI, the mitigation is likely to relate more to pollution and noise than to recreation, given potential use of site for business/industry rather than residential

Tore –

I1 – re Q1 this assessment has not considered the presence over the southern (E-W) part of the site of woodland in the Ancient Woodland Inventory (category 2b – LEPO); and in terms of Q3 (green networks) the mitigation (open space provision) seems unrealistic given that this is zoned for industrial rather than residential use

Nigg –

I1 – re Q1 a small part of the site at the SE corner lies within the Rosemarkie to Shandwick Coast SSSI

Fearn Aerodrome –

MU1 and B1 – re Q1 this has not taken account of the connectivity with Loch Eye SPA, which requires consideration as part of the HRA of the plan. Re Q2 this notes the possible presence of protected species but offers no mitigation (e.g. protected species surveys and mitigation plans)

Fendom –

MU1 and I1 – re Q1 as well as being in close proximity to the Dornoch Firth and Morrich More SAC and Dornoch Firth and Loch Fleet SPA, it is also close to the Loch Eye SPA – all this needs to be assessed as part of the HRA of the plan. Re Q2 this notes the possible presence of protected species but offers no mitigation (e.g. protected species surveys and mitigation plans)

<p>Appendix 6: Cumulative Assessment</p> <p>This is a very generic assessment, taking a broad overview of overall development scenarios across the plan area of 100%, 60% or 30% of site take-up. Perhaps instead for your consideration a table could be prepared by SEA Objective of all sites with '-', '--', '+' and '++' scores, to see whether these would have a synergistic impact either because the SEA resource is limited in extent or in distribution. The concentration for example of significant negative impacts on protected species (specifically badgers) around Inverness would indicate a synergistic impact which requires a strategic rather than a case-by-case mitigation response. (Having said that, Policy 58 of HwLDP regarding Protected Species does refer to both individual and cumulative impacts). Also perhaps the potential loss of ancient, long established and semi-natural woodland across the plan area can be calculated as a percentage of the whole resource to consider its cumulative significance. For landscape, perhaps the cumulative assessment could be on the basis of Landscape Character Types, and whether a level of development in an area would affect their distinctive and recognisable pattern. As the tables state, for development affecting European sites, cumulative (in-combination) effects must be considered as part of the Habitats Regulations Appraisal.</p>	<p><i>See comment above on this issue.</i></p>
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Comments on the Environmental Report Addendum (May 2013)

Historic Scotland

Comment	Response
<p>I have reviewed the addendum on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. My focus in reviewing the addendum is on the potential for significant environmental impacts on the historic environment that may arise from these additional sites.</p> <p>I welcome the detailed assessment that has been carried out on the additional sites and alternatives that have been identified following your consultation on the Main Issues Report. I am content to agree with the findings of the assessment and welcome the identification of mitigation to be brought forward through developer requirements for each individual site. Of the assessments of the sites I would wish to offer the following comment.</p>	<p><i>Noted.</i></p>
<p>Tain NS28 We would suggest that any housing development in this area should consider the setting of the scheduled monument (and Category B listed building) St Duthus Chapel and request that the developer requirements attached to the site note that consideration needs to be given to the setting of this site.</p>	<p>Noted. This will be revised in the Revised Environmental Report.</p>

Scottish Environment Protection Agency

Comment	Response
<p>We generally agree with the findings of SEA and welcome the clear way in which the SEA recommendations for further mitigation have been set out. In our response to the Inner Moray Firth Local Development Plan Main Issue Response (MIR) we have enclosed a spreadsheet. Within this spreadsheet there is a column which highlighted where mitigation is identified in the SEA. As the sites were not part of the MIR is not clear whether mitigation identified in the SEA will be brought forward into the Proposed Plan. Much of this mitigation would be required to ensure we did not object to the Proposed Plan. This again highlights the importance of the SEA and the role it has in informing your choices regarding allocations.</p>	<p><i>Noted. The SEA site assessments included in this addendum will form part of the Revised Environmental Report and will influence the content of the Proposed Plan</i></p>
<p>As the Inner Moray Firth Local Development Plan is finalised, Highland Council as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.</p>	<p><i>Noted</i></p>

Scottish Natural Heritage

Comment	Response
<p>Once again we would commend you for the thoroughness of the site assessments, which involve 36 questions relating to the SEA</p>	<p><i>Noted.</i></p>

<p>Objectives. We trust this will prove useful to you in identifying the development factors and developer requirements that should be included for preferred allocations in the Proposed Plan. Our detailed comments are provided in the Annex to this letter. On a more general level, some of the points still seem to apply now on which we commented at the time of the Environmental Report for the MIR –</p>	
<p>1. Where a site would affect woodland that is ancient, semi-natural or long established which is included in the Ancient Woodland Inventory, we consider this should be assessed as a significant negative effect (-) rather than a minimal negative effect (-), given the strong protection afforded to such woodland by Scottish Planning Policy and the Control of Woodland Removal Policy.</p>	<p>Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.</p>
<p>2. No cumulative assessment has been carried out in this Addendum, but it is stated that an updated cumulative assessment will be carried out when the Revised Environmental Report is prepared to accompany the Proposed Plan. We recommend that this updated cumulative assessment should consider certain targeted cumulative effects, such as impact on badgers around Inverness (noting that a further site south of Inverness is now proposed for inclusion in the Proposed Plan).</p>	<p>Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.</p>
<p>3. Likely effects on protected species are assessed as neutral (=) in all cases because a protected species survey and protection plan if required will be requested as relevant. At this stage it would be more accurate to assess the effect on protected species of allocating sites as 'Unknown' (?) rather than Neutral, bearing in mind that this SEA assumes no mitigation. It will be important that protected species surveys and protection plans are required whenever there is a likelihood of protected species being affected, in order to avoid eventual possible adverse effects.</p>	<p>Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.</p>

<p>4. Where a site is Preferred despite there being significant negative effects, it would be very helpful if a short 'Commentary' paragraph was included after the matrix, to explain the selection. Also in such cases it is important that the mitigation to be included in the Proposed Plan is fully set out. One example from these additional sites is Strathpeffer NS2 – Kinellan Mid.</p>	<p>Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.</p>
<p>8.8.3 – 2nd bullet point - it is noted that suggested changes of use from say industrial to residential have not been subject to SEA. However depending on location this may have a significant environmental effect if a Natura site sensitive to recreational disturbance is close by, e.g. a Special Protection Area.</p>	<p>Noted. While this was not the case through the alternative sites consultation it has been carried out for the Revised Environmental Report.</p>
<p>8.8.3 – 3rd bullet point - here it says that suggested expansions to Hinterland and SLA boundaries have been subject to SEA, but not possible contractions. However section 10 of this ER Addendum does include assessment of contractions as well as expansions. This latter approach seems better, since both expansion and contraction of designated/policy areas could have significant environmental effects.</p>	<p>Noted. This was a typographical error.</p>
<p>8.9.1 – we would suggest the following sites (preferred or non-preferred) would also have significantly negative environmental effects in terms of SEA Objective 1 (biodiversity) because of apparent impact on Inventoried Ancient Woodland – – Drumnadrochit NS14 – Blairbeg – Invergordon NS18 – House of Rosskeen</p>	<p>Noted. This will be revisited in the Revised Environmental Report.</p>
<p>It would be useful if an extra column was added to note the mitigation that will be included in the LDP for those sites listed which are preferred (e.g. Strathpeffer NS2).</p>	<p>The mitigation section will contain all mitigation which may be used in the Proposed Plan. However, where the mitigation is covered by general policies of the IMF LDP or the HwLDP then these may not be included. It is not considered proportionate to have a further column detailing which mitigation will be included in the plan.</p>

<p>There appear to be a couple of typing errors –</p> <ul style="list-style-type: none"> – Conon Bridge NS56 – relevant SEA Objective is 25 (active travel), not 14 (peatland) – Alness NS132 – relevant SEA Objective is 21 (flooding), not 12 (geodiversity) 	<p>Noted. These will be revised.</p>
<p>8.10.1 – here it is noted that an updated cumulative assessment will be carried out at the Revised Environmental Report stage accompanying the Proposed Plan. We recommend this should consider certain targeted cumulative effects. For example there are further sites around Inverness within these Alternative Sites which affect badger habitat, so have potential effects both individually and in combination.</p>	<p>Noted. Please see our response to this issue as raised in the SNH response to the Environmental Report.</p>
<p>Beaully NS133 – House of Beaully – for protected species a 'Neutral' (=) score has been given, although a protected species survey and possible mitigation plan is noted. As we commented for the previous ER, we suggest an 'Uncertain' (?) score would be more appropriate in such cases, given that this SEA assumes no mitigation. (NB: This comment applies to all other sites, but not repeated there)</p> <p>Beaully NS25 – Wellhouse – for Q12, this site is adjacent to the Barnyards GCR Site</p> <p>Drumnadrochit NS14 – Blairbeg – given that some of the woodland here appears to be within the Ancient Woodland Inventory (Type 2b – long established, of plantation origin), a '- -' score (significant negative) would seem to be more appropriate.</p> <p>Inverness NS19 – Drumossie Hotel – re Q2 a badger survey in particular should be noted (We assume this assessment also covers site NS19B)</p> <p>Inverness NS37 – Simpsons Garden Centre - re Q2 a badger survey in particular should be noted; re Q4 a negative effect has been noted</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

re the green network but mitigation has been filled in as 'N/A' – some mitigation measure would be helpful here (e.g. retention of hedge/tree line alongside the A9); re Q11 the site is greenfield but has been scored as '=' rather than '-'

Inverness NS41 – Birchwood, Inshes – re Q1 this has not picked up on the semi-natural woodland covering this area, so a '-' score would seem more appropriate; re Q3 given that the commentary says development of this site would significantly affect the green network, a '- -' score would seem more appropriate here (in addition the suggested mitigation of open spaces does not seem comparable to the existing belt of mature woodland); re Q11 the site is greenfield but has been scored as '=' rather than '-'; re Qs 32 and 33 these have been scored as negative because of the removal of large areas of woodland, but no mitigation is offered (although is this because this is a non-preferred site?)

Cawdor NS1 – re Q1 the site appears to include woodland, so it is unclear why the score is '=' rather than '-'; re Q2 if the site contains woodland a protected species survey and mitigation plan if necessary should be required; re Q3 given that there will be some impact on the green network, a '-' score would seem more appropriate than an '=' (neutral) score; re Q11 given that this site is part brownfield and part greenfield a '+/-' score would seem more appropriate

Nairn NS4 – Househill – re Q1 the '=' score seems to overlook (a) the presence of woodland across some of the site, and (b) the connectivity with nearby SPAs at the coast re recreational activity – a '-' score would therefore seem more appropriate; re Q2 the existence of seminatural woodland points to a protected species survey and mitigation plan as necessary being required; re Q3 given that a likely effect on the green network because of impact on woodland is noted, a '-' score would appear more appropriate (especially as the SEA scoring assumes no mitigation – retention of trees to provide links throughout the site to link the river corridor to woodland to the east

should be considered for mitigation); re Q11 given much of the site is greenfield a '+/-' score would seem more appropriate

Alness NS107 – Dalmore Distillery – re Q11 since the site is both brownfield and greenfield a '+/-' score would appear more appropriate; although the proposed use of the site is Industrial, some of the questions are answered as if the intended use was Residential

Alness NS108 – Teaninich Distillery - re Q11 since the site is both brownfield and greenfield a '+/-' score would appear more appropriate

Alness NS131 – Averon Way - re Q11 since the site is both brownfield and greenfield a '+/-' score would appear more appropriate

Alness NS132 – Alness Point Business Park - re Q11 since the site is both brownfield and greenfield a '+/-' score would appear more appropriate

Conon Bridge NS11 – N of Windsor Place – re Q1 nearby designated sites are Conon Islands SAC, Lower River Conon SSSI and Cromarty Firth SPA/Ramsar; re Q11 given the site is greenfield a '-' score would be anticipated

Conon Bridge NS56 – Droughy Duck lands – re Q1 Conon Islands is an SAC rather than an SPA; re Q2 if there may be protected species on the site, a protected species survey and mitigation plan if necessary should be required

Conon Bridge NS12 – B9163/A835 Junction - re Q11 given the site is greenfield a '-' score would be anticipated

Contin NS111 – adjacent to 'Torridon' – re Q1 this notes the presence of woodland on the Ancient Woodland Inventory (Type 2a – ancient, of semi-natural origin) on the site and therefore scores it '-' (significant negative). We agree with this, although we query the suggested

mitigation of compensatory planting, given the strong protection for ancient seminatural woodland in SPP and CoWRP; re Q3 it is noted that there would be a likely effect on the green network given the presence of woodland here, and so a '-' rather than a '=' score would be anticipated (we would also query the provision of open space as mitigation for an effect on a green network that comprises woodland); re Q11 given the site is greenfield a '-' score would be anticipated; re Q32 given it is noted that development here would result in the removal of valued landscape features a '-' or even a '- -' score would be anticipated

Cromarty NS58 – South of Manse (1) – re Q1 the semi-natural woodland adjacent to the site could be considered (e.g. mitigation in terms of buffer distance); re Q11 given the site is greenfield a '-' score would be anticipated; re Q32 general sensitive landscape impact on the edge of the settlement could be considered (e.g. mitigation in terms of landscape planting)

Cromarty NS59 – South of Manse (2) – re Q3 given this notes some impact on the existing green network (albeit with a requirement for open space) a '=' rather than a '+' score would be anticipated; re Q11 given the site is greenfield a '-' score would be anticipated; re Q13 (soils) this is scored differently to the above site which is the adjacent field, so perhaps a need to check this (it is noted as prime land under 'Cons'); re Q32 it is not clear if the general sensitive landscape impact on the edge of the settlement has been considered

Dingwall NS15 – S of Craig Road – re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Cromarty Firth SPA/Ramsar site; re Q11 given the site is greenfield a '-' score would be anticipated

Dingwall NS20 – East of Eastend Wood - re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Cromarty Firth SPA/Ramsar site; re Q11

given the site is greenfield a '- ' score would be anticipated; re Q13 given that it is noted that a large part of the site is prime land a '- ' rather than '= ' score would be anticipated

Evanton NS113 – NE of Drummond Farm – re Q1 connectivity to the Cromarty Firth SPA/Ramsar/SSSI via a minor road for potential recreational access could be noted (and would require screening re Habitats Regulations Appraisal if a preferred site); re Q11 given the site is greenfield a '- ' score would be anticipated

Fortrose NS47 – W of Caravan Park - re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Moray Firth SAC; re Q3 given a negative effect has been identified for the green network, some mitigation would be anticipated (retention of open corridors within the site?); re Q11 given the site is greenfield a '- ' score would be anticipated

Fortrose NS129 – Ness Gap – re Q1 this site appears to be zoned for retail, and so this will have a bearing re the HRA of this site for relative proximity to the Moray Firth SAC; re Q3 given a negative effect has been identified for the green network, some mitigation would be anticipated (retention of open corridors within the site?); re Q11 given the site is greenfield a '- ' score would be anticipated

Invergordon NS18 – House of Rosskeen – re Q1, given that a large part of the site is indicated as included in the Ancient Woodland Inventory (Type 1b – long established of plantation origin) we suggest a '- - ' score would be more appropriate; re Q11 given the site is largely greenfield we suggest a '+/- ' score would be more appropriate

Muir of Ord NS22 – Ardnagrask – re Q11 given the site is greenfield a '- ' score would be anticipated

Muir of Ord NS46 – Tomich House – re Q1 this has not picked up on the semi-natural woodland that is present across part of the site; re

Q11 given the site is greenfield a '-' score would be anticipated

Muir of Ord NS130 – Glen Ord Distillery – no further comments (welcome reference re Q2 to possible presence of great-crested newts and bats)

Munlochy NS121 – Land E of B1 – re Q1 the site is in relative proximity to Munlochy Bay SSSI and Inner Moray Firth SPA/Ramsar and connectivity is possible via drainage (bearing in mind proposed Business use) – this should be noted here and would require screening re Habitats Regulations Appraisal if a preferred site; re Q11 given the site is greenfield a '-' score would be anticipated; re Q32 this notes a significant landscape impact as it is a very prominent site outside the settlement, so it is unclear why this is scored '=' rather than '-' or even '- -'

North Kessock NS122 – Bellfield – re Q11 given the site is part greenfield and part developed we suggest a '+/-' score would be more appropriate

Seaboard NS91 – Cadboll Farm - re Q11 given the site is greenfield a '-' score would be anticipated

Strathpeffer NS16 – N of former railway station - re Q11 given the site is greenfield a '-' score would be anticipated

Strathpeffer NS2 – Kinellan Mid – re Q2 we would advise this is strengthened to require a protected species survey and mitigation plan, particularly with regard to Slavonian grebe and Great crested newt; re Q11 given the site is greenfield a '-' score would be anticipated

Tain NS23 – Glenmorangie Distillery – re Q1 and proximity to Dornoch Firth and Loch Fleet SPA and Dornoch Firth and Morrich More SAC, given the allocation would be Business/Industrial (expansion of the

distillery), a recreational access management plan would not be relevant – instead the Habitats Regulations Appraisal should consider any likely effect re any pollution or water run-off; re Q11 given the undeveloped part of the site is greenfield a ‘-’ score would be anticipated; re Q13 given that it is noted that the undeveloped part of the site is prime land, a ‘-’ score would be anticipated; re Q32 we agree the ‘-’ score because of the open aspect of the area, its adjacency to the A9 and Far North Railway Line and being next to the Dornoch Firth NSA. We agree that landscape and visual mitigation will be important, and with regard to the NSA reference should be made to its special qualities (e.g. “the tranquillity of an undeveloped coastline”)

Tain NS28 – Kirksheaf - re Q11 given the site is greenfield a ‘-’ score would be anticipated Tain NS71 – S (actually W) of A9 – re Q1 the relative proximity to Morangie Forest SPA (capercaillie being the qualifying feature) should also be noted here, with connectivity for recreation appearing to be possible via a track to the south; re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q13 given the site is noted here as prime land a ‘-’ score would be anticipated

Tore NS127 – Ryefield - re Q11 given the site is greenfield a ‘-’ score would be anticipated

Tore NS128 – Grain Mill extension - re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q32 given this notes the visual prominence of the site and its sensitivity by the A9, a ‘-’ score would be anticipated (although it is noted that mitigation has nevertheless been set out in the form of a landscaping and tree planting plan) Expansion of SLAs – re Q18 (wildness) this could be assessed in comparison to the recent map of Core Areas of Wild Land, or the broader map of relative wildness Contraction of SLAs – re Qs 16 and 17 (landscape), although these have been assessed as negative, in this case the areas suggested for removal from the SLA are within the Cairngorms National Park, and so will still receive recognition for their

<p>landscape quality through National Park polices. Therefore we suggest these can also be scored '=' (neutral effect)</p> <p>Expansion of Hinterland – re para 10.10.2 we assume there is a typographical error, since Qs 16 and 17 (landscape) are scored '+' for this option, but this commentary paragraph refers to a slight negative effect</p>	
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Other Comments Received

Comment	Response
<p>As the agent for Mr McBean the landowner of site NS 58, we attach comments on inconsistencies between the SEA's which have been prepared for Mr McBeans (a preferred site NS58), and an adjacent site NS59 (non preferred) site.</p>	<p><i>Noted. These will be addressed in the Revised Environmental Report</i></p>
<p>9.8.1 SITE ASSESSMENT DRUMNADRICHIT NS14 BLAIRBEG The following responses are offered to the comments in the assessment document. 1 – 3. Some loss will occur but the No. of Plots has been reduced. Plot 1 has the fewest trees. Medium value trees (4 in all) are located on the boundary edges of Plots 1 and 3. Apart from 2 medium/low value trees on the roadside boundary of Plot3 all the rest are low value or recommended for removal. Refer to Tree Survey. 5 See 7.10.1 for comments on roads. 9 Little used by public owing to existing old walls impeding access. Most activity is on the north and west side of the wood. There is one informal route crossing SW corner of Plot 3. See 10 below and last year's submission. 10 Little used informal route can easily be moved 3-4 meters and a proper</p>	<p><i>Noted. Much of the issues raised here would be mitigation of any negative affects of the proposed allocation.</i></p>

safe gap in the boundary wall rather than the existing access created by the simple expedient of knocking the top of the wall down. 32 Majority of wood will be retained and kept as such with, hopefully, management and regeneration if all or most comes to pass. The area of potential low density private development is on the far, south, side of the village away from it. The visual aspect from the village will not be altered. The landscape will remain the same. The above relates to para 7.10.1. Drumnadrochit NS14 Blairbeg

Comments on Revised Environmental Report

Historic Scotland

Comment	Planning Authority Response
<p>Spatial Strategy</p> <p>I welcome the approach taken to the assessment of the spatial strategy and can confirm that I am content to agree with the majority of the findings as they relate to the historic environment. However, I would like to offer the following comments and note one omission within the assessment.</p>	<p>Noted</p>
<p>Castle Stuart CS1 The assessment table indicates that no scheduled monuments will be affected by the proposal. However, the scheduled monument Newton of Petty, settlement 350m WNW of (Index no. 11835) lies within the allocation. It is noted that the Proposed Plan itself recognises this within the developer requirements for the site. However, the assessment should note the potential significant effect of the allocation on this monument.</p>	<p>Agreed – the site assessment has been updated to reflect this in the finalised environmental report; we do not believe this will result in a material change to the assessment within the environment report.</p>
<p>Site containing scheduled monuments</p> <p>While noting that adverse impacts have been identified for the historic environment in relation to most of the development allocations containing scheduled monuments I would argue that such impacts should be considered significantly adverse (--) until successfully mitigated. In particular I would have expected significant adverse effects to be noted for</p>	<p>Agreed - the site assessments have been updated to reflect this in the finalised environmental report; we do not believe this will result in a material change to the assessment within the environment report.</p>

<p>the following sites:</p> <p>Castle Stuart CS1 (as noted above)</p> <p>Inverness IN82</p> <p>Inverness IN84</p> <p>Muir of Ord MO5</p>	
<p>Monitoring</p> <p>With the above in mind it is disappointing to note that there is no immediate plan to monitor the effects of the plan in relation to these sites. Given the relatively small amount of sites in question I would advise that this is reconsidered and an appropriate way is found of testing the effectiveness of the mitigation in protecting these sites as development progresses.</p>	<p>Noted. A monitoring proposal will be brought forward to deal with this issue through the post adoption statement.</p>

SEPA

Comment	Planning Authority Response
<p>We are generally satisfied with the revisions to ER however we do not fully concur with the summary of sites which you consider may have a significant effect. As highlighted in our response to the Proposed Local Development Plan, we consider that the following sites are likely to be at significant flood risk and it is uncertain whether the principle of development can be established in accordance with Scottish Planning Policy. We therefore consider these to have a significant negative effect.</p> <ul style="list-style-type: none"> a) IN9 (land to South and East of Inverness Harbour Marina) b) DW7 (Dingwall River site North) c) DW8 (Dingwall Riverside South) d) IG12 (Delny) e) AR5 (South of Cromal Terrace) f) DR4 (Land west of Post Office) <p>DW7 and DW8 are within the table but the remainder of sites have not been picked up in the assessment.</p>	<p>It is agreed that the sites listed have a potentially significant negative effect as they likely to be at significant risk of flooding.</p> <p>The sites listed have been reviewed and where appropriate the relevant site assessments and summary tables have been amended to identify a significant risk of flooding. All these sites were recommended to be retained in the plan in the Examination Report despite flooding concerns from SEPA. IN9 however was reduced in size due to potential adverse environmental risks and impacts.</p>
<p>We note that you consider AL14 and DW1 to have a significant negative effect in terms of flood risk. It would be useful to ascertain why the Council concludes this as it may be you have additional flood risk information which would be useful to us.</p>	<p>AL14 and DW1 were considered to have a significant negative effect in terms of flood risk because large of parts of the site were shown to be at risk of flooding on the SEPA Flood Map rather than any additional flood risk information.</p>
<p>As the Development Plan is finalised, The Highland Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this</p>	<p>In preparing the finalised Environmental Report account has been taken of the views expressed upon it during consultation period of the Revised Environmental Report. Changes have been made to it where</p>

consultation period.	appropriate to reflect comments received.
<p>As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government Guidance available at: www.scotland.gov.uk/Publications/2013/08/3355. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.</p>	<p>This will be prepared as soon as reasonably practical after adoption of the plan.</p>

SNH

Comment	Planning Authority Response
<p>Our detailed comments are set out in the Annex to this letter. Please also refer as relevant to our previous letter at the Main Issues Report stage. As a general comment this is a very thorough assessment of the sites, policies and strategies of this LDP.</p>	<p>Noted</p>
<p>Four points for consideration here and in future LDP SEAs are as follows –</p> <p>1. The site assessments across a range of 36 questions have usefully identified much mitigation for negative effects. Not all of this mitigation has been translated across into development requirements in the plan. Therefore we would hope that this Revised ER would continue to be referred to as a ‘living document’ when site proposals are being taken forward, including the preparation of development briefs/masterplans.</p>	<p>It is accepted that not all of the mitigation specified in the site assessments has been translated across into development requirements in the plan. This is often because the plan is intended to be a concise document that only specifies key requirements that are essential for the development of the site to progress. The finalised ER will continue to be referred to as a ‘living document’ and will be referred to when site proposals are being taken forward, including the preparation of development briefs/masterplans. Greater care will also be taken when preparing future LDPs to ensure that all essential mitigation contained within site assessments reflected as requirements for individual allocations.</p>
<p>2. SEA Question 1 re biodiversity, flora and fauna has a very useful linkage with the Habitats Regulations Appraisal (HRA) of the plan in terms of identifying sites with likely significant effects on European sites. We recommend that the SEA and HRA should correlate in terms of identifying when sites are likely to affect a European site. We suggest a likely significant effect should be assessed as significantly negative (so identifying that it should be screened in alone for the purposes of HRA) and a minor (but not significant) effect should be assessed as negative (so identifying that it should be considered as part of the in-combination</p>	<p>As the original ER was prepared prior to the HRA there are some inconsistencies between the scoring in the site assessment matrices and sites that were screened in either alone or in-combination in the HRA. However for future local development plans, including the Caithness and Sutherland Local Development Plan there has been greater correlation between the SEA and the HRA to ensure any sites that may require Appropriate Assessment are flagged up at an early stage of the SEA process.</p>

<p>assessment of the HRA). The Scottish Government has just issued an Advice Sheet on SEA and HRA – see – http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Policy/themes/enviro-assessment/a-a/HRAAdvicesheets</p>	
<p>3. Where an allocation will result in the loss of inventoried ancient woodland, we consider it should be assessed as a significant negative effect, given the strong policy protection afforded to such woodland by the Scottish Government Control of Woodland Removal Policy and by Scottish Planning Policy. Suitably robust mitigation should be included in cases where exceptionally the strong presumption against woodland removal will be outweighed by the plan.</p>	<p>Agreed this will be also be enacted during the preparation of future LDPs.</p>
<p>4. The cumulative assessment is a generic assessment of the plan based on a high, medium or low level of development. We would be more comfortable if the identified negative/significant negative effects were considered cumulatively in order to assess whether additional ‘strategic’ mitigation was required for cumulative impact. In this case, this could be done in particular for the Growth Areas of Inverness-Nairn and Easter Ross. However it is useful to see here how the positive effects of the general policies in HwLDP and Supplementary Guidance are anticipated to counteract any negative effects of the level of development proposed in IMFLDP.</p>	<p>Noted this type of cumulative assessment will be undertaken for future LDPs.</p>
<p><u>Non Technical Summary</u></p>	
<p>Page 5 – Biodiversity, flora and fauna – the text here refers to habitats in Highland but presumably the following table of designations is limited to the</p>	<p>Noted, the table should indeed refer to the Inner Moray Firth area</p>

Inner Moray Firth area.	rather than Highland. This has been corrected in the finalised ER.
Ramsar sites in the table should be lower case	Agreed, this has been corrected in the finalised ER.
Perhaps the percentage of the plan area covered by designated nature conservation sites could be included	It is not felt there would be sufficient value in adding the percentage of the plan area covered by designated nature conservation sites at this stage. This figure is however included in ERs for the Council emerging Caithness and Sutherland LDP.
It would be worth mentioning the adjacency of the plan area to the Moray Firth SAC	Agreed this reference has been added to the finalised ER.
Reference could be added to the extensive semi-natural areas in the south and west of the plan area (Monadhliath, Glen Affric, Glen Strathfarrar, Strathconon)	Agreed this reference has been added to the finalised ER.
Page 5 – Soil – mention should also be made of the extent of prime quality agricultural land in the plan area. Development in the Inner Moray Firth area has a specific potential to affect the prime land resource of Highland. (This is however covered in the main part of the RER)	Agreed this reference has been added to the finalised ER.
Page 7 – Landscape – we suggest the text is amended to “A number of Landscape Character Assessments cover the plan area and describe the variety of landscape character types across the area”.	Agreed the finalised ER has been amended to reflect this suggestion.
This section should also mention the National Scenic Areas that are wholly or partly within the plan area.	Agreed – reference to National Scenic Areas wholly or partly within the plan area has been added to the finalised ER.
Also there should be mention of the Core/Search Areas of Wild Land, particularly in the south and west of the plan area.	Agreed – references to wild land areas have been added to the finalised ER.
Page 9/10 – table of significant effects of allocations – the NTS does not include the SEA Questions, and so this table cannot be understood by	Agreed – topics relating to questions have now been added to the

reading the NTS alone. We suggest the SEA Questions should be listed before this table.	table.
<u>Relationship with other PPS and environmental protection objectives</u>	
Page 18 – re the Convention on Biological Diversity (1992) this needs to be updated now to refer to the UN Convention on Biological Diversity (2010) and the Aichi Targets (2010)	Noted – the finalised environmental report has been updated to reflect this.
Page 27 – re Scottish Biodiversity Strategy this needs to be updated to refer also to the 2020 Challenge for Scotland’s Biodiversity (2013) which is a supplement to the 2004 Strategy - http://www.scotland.gov.uk/Resource/0042/00425276.pdf	Noted – the finalised environmental report has been updated to reflect this.
Page 25-40 – Scotland National – the following appear to be missing: <ul style="list-style-type: none"> • Wildlife and Natural Environment (Scotland) Act 2011 (e.g. with regard to INNS and reporting on Biodiversity Duty) • Scottish Soil Framework 2009 (this appears instead under Scottish National Planning Policy Tier on p52) 	Noted - the finalised environmental report has been updated to reflect this.
<u>Relevant aspects of current state of environment</u>	
Page 63 – Biodiversity, flora and fauna – please see comments above under NTS	Noted - this is a minor wording error and will be corrected in the finalised environmental report.

Page 67 – Landscape – please see comment above under NTS re suggested text change for Landscape Character Assessments	Agreed – the finalised ER has been updated to reflect this.
Wild areas – re the mapping of these areas, proposed Core Areas of Wild Land are now available. Mapped Search Areas for Wild Land are also available.	Noted – reference to the latest wild land position has been added to the finalised ER.
National Scenic Areas – mention can be made of the Special Qualities Report for each NSA	Agreed – reference is now made to lists of landscape qualities that make NSAs special including a link to the SNH website.
Reference can also be made to the coastal classification in the Highland Coastal Development Strategy	Agreed – mention has been made of this in the finalised environmental report
<u>Environmental problems</u>	
Page 69 – Biodiversity, flora and fauna – the problem of invasive non-native species (INNS) can be added here	Agree – this has been added to the finalised environmental report
<u>Cumulative Assessment</u>	
Pages 89-92 - please see our previous comments made at the MIR stage where relevant. We would be more comfortable if the identified negative/significant negative effects were considered cumulatively in order to assess whether additional 'strategic' mitigation was required for cumulative impact. This could be done in particular for the Growth Areas of Inverness-Nairn and Easter Ross. However it is useful to see how the positive effects of the general policies in HwLDP and Supplementary Guidance are anticipated to counteract any negative effects of the level of development proposed in IMFLDP.	Noted this type of cumulative assessment will be undertaken for future LDPs.

It is unclear why SEA Objective 5 (retention and improvement of open space) is assessed as negative for the high and medium levels of development. Are policies in IMFLDP, HwLDP and Supplementary Guidance not as protective for open space as for other environmental factors?	Noted, this will be considered further in preparation of future LDPs.
<u>Measures for prevention, reduction and offsetting of significant negative effects</u>	
Page 93 – reference is made here to a table setting out residual environmental problems and mitigating measures, but no table appears here.	Noted – this was a typing error and references to this table have now been removed.
<u>Monitoring</u>	
Page 96 – the number of planning applications affecting inventoried woodland could be monitored (as well as where compensatory tree planting is required)	Agreed – this monitoring indicator has been added to the table.
<u>Next steps</u>	
Page 99 – this table needs updating, e.g. Stage 3 states that publication of the Proposed Plan and Revised Environmental Report is Autumn 2012	Noted – this table has been updated to reflect actual and anticipated timescales
<u>Appendix 1 – Responses to Comments on Environmental Report and Addendum</u>	
Thank you for considering our previous comments in such detail	Noted

Appendix 2 – Baseline Information Data and Maps

<ul style="list-style-type: none"> • Special Qualities of NSAs – the full web link to these reports is - http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/nationaldesignations/nsa/special-qualities/ • Designated Area Information – this is available via SiteLink/SNHi, including site condition information – http://www.snh.gov.uk/publications-data-and-research/snhiinformation-service/sitelink/ • Protected Species – baseline information is available on the NBN Gateway - https://data.nbn.org.uk/ • Wild Land – maps of proposed Core Areas of Wild Land, together with existing Search Areas for Wild Land, can be found on our website - http://www.snh.gov.uk/protectingscotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wildland/mapping/ 	<p>Noted - data sources have been updated to reflect this in the finalised environmental report.</p>
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Appendix 3a – Preferred policy approaches

<p>General comment – we note that it is assumed that proposals must meet the relevant policies in the Highland wide LDP as well as conforming with the vision, strategy and policies of this plan. Scoring is therefore to be understood on this basis.</p>	<p>Noted.</p>
<p>Policy 2 – Delivering Development – more positive scoring for this policy would be achieved if it referred to developer requirements as well as infrastructure, services and facilities</p>	<p>Noted, this will be taken into account in the preparation of future local development plans.</p>

Appendix 3b – Alternative policy approaches

Hinterland Boundary – Alternative 2 – Expansion – the commentary text requires amending as this refers to a smaller rather than larger area

Noted – this is a minor wording error that has been corrected in the finalised environmental report

Appendix 4a – Site Assessments – Preferred

Please see our previous comments made at the MIR stage where relevant

This assessment has usefully identified much mitigation, not all of which is translated across into development requirements in the plan. So we would hope that the SEA would continue to be referred to when site proposals are being taken forward, in order to take forward the whole suite of mitigation measures identified through the SEA (e.g. NA3 Achareidh and NA6 Delnies re protected species, CS1 Castle Stuart re satisfactory siting and design in this open site; protected species surveys generally; safeguarding of core path at IN58).

Noted – the SEA will continue to be referred to when site proposals are being taken forward.

Question 1 has a very useful linkage with the Habitats Regulations Appraisal in terms of identifying sites with likely significant effects on European sites. You may wish to check the SEA so that it correlates in this regard to the HRA. For example the sites at Ardersier are not picked up under Q1 with regard to connectivity with the Inner Moray Firth SPA/Ramsar. And TN5 Knockbreck Road, Tain does not mention Dornoch Firth and Loch Fleet SPA/Ramsar. Also IN24 Torvean/Ness-side does not mention connectivity with River Moriston SAC; IN76 Stratton Lodge should

Noted – the finalised Environmental Report correlates with the HRA in these respects.

<p>make reference to Inner Moray Firth SPA/Ramsar.</p>	
<p>Where an allocation will result in the loss of ancient woodland, we consider it should be assessed as a significant negative effect (- -), given the strong policy protection afforded to such woodland by the Control of Woodland Removal Policy and by Scottish Planning Policy. This applies here to –</p> <ul style="list-style-type: none"> • Dores DO1 • Tomatin TM4 • Tomatin TM5 • Tore TR4 	<p>Agreed – site assessments have been updated to reflect this in the finalised environmental report.</p>
<p>Culbokie – the assessment of CU7 appears erroneous in that it is stated that this site is within Culbokie Woods. Perhaps this has erroneously been brought forward from Site H6 in the MIR, which is now non-preferred.</p>	<p>Noted – this has been corrected in the finalised environmental report.</p>
<p>Inverness IN8 – the significant negative assessment for Q8 (contamination) has not been translated into mitigation in the plan (although it may be generally picked up anyway by a policy in HwLDP)</p>	<p>Noted – it is considered that this would be addressed by compliance with HwLDP Policies</p>
<p>Inverness IN9 - the summary table in the main part of the Environmental Report lists this site as significantly negative for Q9 (open space). However the - - score is for Q21 instead (flood risk)</p>	<p>Noted – this has been corrected in the finalised environmental report.</p>

Inverness IN12/IN13 – the summary table in the main part of the Environmental Report lists a significant negative effect re Q8 (contamination) for IN12 (Harbour Road) whereas this should be for IN13 (former Longman Landfill)	Noted – this has been corrected in the finalised environmental report.
Inverness IN29 (Dunain Woodland) – this is assessed as negative for Q1-3 (including a significant negative effect re Q1 in terms of inventoried woodland). However the allocation is for safeguarding as community woodland, and so it would not be anticipated that such negative effects would arise.	Noted – this has been corrected in the finalised environmental report. However we do not believe this will result in any material changes to the assessments within the environment report.
Inverness IN50 – the significant negative assessment for Q32 (landscape character) has not been translated into mitigation in the plan (although it may be generally picked up anyway by a policy in HwLDP)	Noted – it is considered that this would be addressed by compliance with HwLDP Policies
Inverness IN82 – this is out of sequence, being between IN48 and IN49	Noted – this has been corrected in the finalised environmental report.
Maryburgh – these sites are indicated as MU rather than MB; also MU4 should be amended to MB3	Noted – this has been corrected in the finalised environmental report.
Munlochy – re Q12 site ML3 is not within the Geological Conservation Review (GCR) Site	Noted – this has been corrected in the finalised environmental report.
Munlochy – the summary table in the main part of the Environmental Report lists site ML4 as significantly positive for Q4 (enjoyment of nature). However the ++ score is for Q25 instead (active travel)	Noted – this has been corrected in the finalised environmental report.

<p>Tomatin – re Q1 the scoring for sites TM1 and TM2 appear to be the wrong way around – it is TM2 rather than TM1 that appears to be located within an area of inventoried woodland (Type 2b – long established of plantation origin). However from a desk appraisal the site appears to have been clear-felled.</p>	<p>Noted – this has been corrected in the finalised environmental report.</p>
<p>Tore – the reference numbers for TR2, TR3 and TR4 appear not to match up to the Proposed LDP sites (TR2 in the ER appears to be TR3 in the PP; TR3 in the ER appears to be TR4 in the PP; and TR4 in the ER appears to be TR2 in the PP)</p>	<p>Noted – this has been corrected in the finalised environmental report.</p>
<p>Nigg – Q1 – Moray Firth SAC should also be considered here</p>	<p>Noted – this has been considered in the finalised environmental report.</p>
<p>Castle Stuart – Q1 – this should refer to Inner Moray Firth SPA/Ramsar</p>	<p>Noted – this is referred to in the finalised environmental report.</p>
<p>This appendix is summarised in tables in the main section of the Environmental Report (pages 9 and 87-88) where significant positive and negative environmental effects are listed. However the following appear to have been omitted from these tables -</p>	<p>Noted – this has been corrected in the finalised environmental report.</p>

Settlement	Site Reference	SEA Question	Significantly Positive Effect	Significantly Negative Effect
Alness	AL1	7		X
Alness	AL5	25	X	
Alness	AL12	35	X	
Alness	AL13	21		X
Avoch	AV2	25	X	
Avoch	AV3	25	X	
Conon Bridge	CB5	25	X	
Inverness	IN6	25	X	
Inverness	IN23	25	X	
Nairn	NA1	25	X	
Tore	TR1-3	25	X	

Appendix 4b – Site Assessments – Non Preferred

Please see our previous comments at the MIR stage where relevant

Noted – this has been considered for the finalised environmental report. However we do not believe this will result in any material

	changes to the assessments within the environment report.
Ardersier H1, H2, H4 – re Q1 this should consider potential connectivity with Inner Moray Firth SPA/Ramsar	Noted, this has been corrected in the finalised environmental report.
Beaully C1 Barnyards – re Q12 part of this site is within a GCR Site, so should be assessed as negative or significant negative	Noted – this has been corrected in the finalised environmental report.
Culbokie H6 – this appears to be missing (re Q1 – Type 2b Ancient Woodland)	Noted – this assessment has been reinserted to the finalised environmental report.
Dores C1(b) - re Q12 the whole of this site is within a GCR Site, so should be assessed as negative or significant negative	Noted – this has been corrected in the finalised environmental report.
Invergordon H4 and C2 – re Q1 these sites are in close proximity to Cromarty Firth SPA/Ramsar	Noted – this has been corrected in the finalised environmental report.
Inverness H55, H56, H57 – re Q1 consideration should be given to proximity to Inner Moray Firth SPA/Ramsar	Noted – this has been corrected in the finalised environmental report.
Inverness H49 and H68-85 – these appear to be missing	Noted – these assessments have been reinserted to the finalised environmental report.
Kirkhill – this includes sites for Tomatin (H3, H4, H8) – re Tomatin H3, it should be noted that this is located within Inventoried Woodland (Type 2b – Long Established)	Noted – this was an error, the assessments have been placed in correct order in the finalised environmental report and Tomatin H3 corrected.
Strathpeffer H6 – re Q2 this should be more specific as regards proximity to Loch Kinellan (Slavonian Grebe) and Great Crested Newt habitat – however this site is now part of the larger site SP1 included in the Proposed Plan, and so assessed already in Appendix 4a	Noted – this has been corrected in the finalised environmental report.

Tain MU2 – re Q1 mention should be made of Dornoch Firth and Loch Fleet SPA/Ramsar	Noted – this will be updated in the finalised environmental report.
Fendom I1 – under Q1 reference should be made to Loch Eye SPA/Ramsar, Dornoch Firth and Loch Fleet SPA/Ramsar and Dornoch Firth and Morrich More SAC	Noted – this will be considered in the finalised environmental report. However we do not believe this will result in any material changes to the assessments within the environment report.
<u>Appendix 5 – Cumulative Assessment</u>	
Please see our previous comments made at the MIR stage where relevant. We would be more comfortable if the identified negative/significant negative effects were considered cumulatively in order to assess whether additional ‘strategic’ mitigation was required for cumulative impact. This could be done in particular for the Growth Areas of Inverness-Nairn and Easter Ross. However it is useful to see how the positive effects of the general policies in HwLDP and Supplementary Guidance are anticipated to counteract any negative effects of the level of development proposed in IMFLDP.	Noted – this approach will be taken for future local development plans.
It is unclear why SEA Objective 5 (retention and improvement of open space) is assessed as negative for the 100% and 60% level of development options. Are policies in IMFLDP, HwLDP and Supplementary Guidance not as protective for open space as for other environmental factors?	This depends on the interpretation of the policy.