Onshore Wind Energy: Supplementary Guidance

Strategic Environmental Assessment

Finalised Environmental Report

September 2016

The Highland Council
Comhairle na Gàidhealtachd

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Non-technical summary

Purpose and objectives of the Environmental Report

This is the finalised Environmental Report for the On-shore Wind Energy: Supplementary Guidance and is not intended to compare and contrast the environmental impact of different types of renewable energy or consider the environmental impacts of other regional, national or international energy policy.

Please note that the finalised Environmental Report retains references to the draft version of the Supplementary Guidance, because the assessment in the revised Environmental Report related particularly to that. The report records the early and effective strategic assessment (and consideration) of environmental effects as part of an iterative process informing decision-making on the contents of the guidance.

The Strategic Environmental Assessment has been subject to consultation at a number of stages and the Post-Adoption Statement will set out how and when The Highland Council took on board these comments. However, the section of this finalised Environmental Report setting out 'SEA activities to date', together with Appendices 1 and 4, contain much of this information.

If you have any questions please do not hesitate to contact the Development Plans Team using the details below.

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Purpose and objectives of the On-shore Wind Energy: Supplementary Guidance

The Highland-wide Local Development Plan (HwLDP) sets the strategic planning policy context for renewable energy developments. The On-shore Wind Energy: Supplementary Guidance fills in the detail to ensure that the policy is well understood and is consistently applied across Highland.

The On-shore Wind Energy: Supplementary Guidance will replace certain elements of the Highland Renewable Energy Strategy (HRES) that relate to on-shore wind energy. [NB. The Council has decided that, in association with finalising the SG, HRES will no longer be used as a matter of course as a material planning consideration for onshore wind energy proposals.]

It has a relationship with a number of other plans but those which are most relevant include:

- The Highland-wide Local Development Plan;
- Highland Single Outcome Agreement 3; and
- The Highland Renewable Energy Strategy.

State of the environment summary

The tables below show a summary of statistics relating to each of the key SEA topics:

Biodiversity, flora, fauna

Highland contains some of Scotland's most important natural environments which are protected under international and national designations: SSSI (348), SAC (89), SPA (44), NNR (18), MPA (8), Ramsar (11). The Plan area also contains 5,037 ancient and semi-natural woodland sites and 128 Tree Preservation Orders.

Climatic factors

In Highland one of the main contributors to climate change is transportation due to the emissions of carbon dioxide. The Draft SG will aim to ensure that developments promote sustainable environments that are more carbon clever and contribute to meeting the Scottish Government targets for renewable energy sources (40% by 2020

Population and Human health

Population of Highland in 2011 was 232,100 with a population density of 8.7 people per sq km which is substantially below the Scottish Average of 67.4. Highland has experienced steady growth over the last 30 years with an 11.1% increase in population since 2001. Population projections also present challenges with Highland's demographic indicating that there will be a significant increase in people aged between 65 to 75+.

Material assets

For the purposes of the Environmental Report, waste, access and transport will be considered to be material assets. There is a requirement for additional waste facilities across the Plan area and access and transport improvements remain challenging due to the expansive scale of the network totalling a combined distance of over 13,500km.

Soil and Peat

Peat is very common across Highland and is important for carbon storage properties as well as supporting distinctive wildlife. Two of the Scotland's three UNESCO European Geoparks also lie within the Plan area. There are also 77 other geological SSSIs and 403 un-notified Geological Conservation Review sites (GCRs). In terms of land capability for agriculture, prime agricultural land represents just 1% of the Plan area, all located within the Inner Moray Firth area. Most soils are at the lower end of the land capability range.

Cultural heritage

Highland is rich in historic and cultural assets with 2,867 Listed Buildings, 1,201 Scheduled Monuments, 46 Gardens and Designed Landscapes, 29 Conservation Areas, 8 Historic Battlefields and an extensive range of Historic Environment Record sites across the Highland area.

Water

The quality of the freshwater environment in Highland is recognised internationally for its importance as a spawning ground for wild salmon and use by the whisky industry. The many lochs and rivers that characterise the area are important for local economies and provide the scenic backdrop that encourages so many tourists to the area.

Landscape

Scotland has a wide diversity of landscapes that have different capacities to accommodate development without significantly changing their character. Some of Scotland's finest landscapes can be found within Highland. It contains over a quarter of Scotland's National Scenic Areas and almost 40% of Scotland's Wild Land Areas. In addition the Council has designated 27 Special Landscape Areas of local/regional importance. Over a third of Highland's coastline is also regarded as unspoilt coast. National Planning Framework 3 has identified the A82 and the A9 as

	far north as Inverness as Scenic Corridors. The Cairngorms National Park lies outside, but immediately adjacent, the area to be covered by the Supplementary Guidance.

Air
Overall air quality in Scotland is generally good, however, further improvements are needed to reduce the adverse effects caused by air pollution in some urban and rural areas. Highland's first Air Quality Management Area has been identified in Inverness city centre and the emerging Air Quality Management Plan will detail further assessment and steps towards improved air quality.

Expected Environmental Implications without the On-shore Wind Energy Supplementary Guidance

Without the guidance, the approach taken would be to rely on the policy in the Highland-wide Local Development Plan and the Highland Renewable Energy Strategy (HRES). HRES is now significantly out of date and conflicts with national planning policy with regard to on-shore wind energy developments. While the Highland-wide Local Development Plan contains a number of general policies in relation to the strategic protection and safeguarding of the environment, the supplementary guidance is key to ensuring that the policy approach is consistently interpreted and applied across Highland.

Assessment approach and key findings

SEA objectives relating to the key topics were identified and are shown below:

SEA Topic	SEA Objectives
Biodiversity, Flora and Fauna	To conserve and where possible enhance biodiversity and accord to the protection of valued nature conservation habitats and species
Population and Human Health	To improve the living environment for all communities and promote improved health of the human population
Soil	Safeguard the soil quality, geodiversity and improve contaminated land
Water	Manage and reduce flood risk and protect the water environment
Climatic Factors	Reduce greenhouse gases and contribute to the adaptation of the area to climate change
Material Assets	Manage, maintain and promote sustainable use of material assets
Historic Environment and Cultural Heritage	Protect and where appropriate enhance the historic environment
Landscape	Protect and enhance the character, diversity and unique qualities of the landscape

The guidance has been broken down into sections and the following sections of the Draft SG and their reasonable alternatives have been assessed against these objectives using an assessment matrix:

- Key Development Plan Considerations

- Highland Stategic Capacity
- Advice for Small-scale Developments
- Further Technical Information

[NB. The structure of the finalised SG document differs in some respects.]

The results of this are summarised in the Environmental Report and can be found in full in Appendix 3. The guidance has also been assessed as a whole to look at the effects the guidance will have when it is applied as a whole rather than each part individually this is called the cumulative assessment. This is summarised in the Environmental Report but can be found in full in Appendix 3.

Baseline information on each of the SEA topics, shown in Appendix 2, has helped to inform the preparation of the Supplementary Guidance and the assessment process.

As part of the assessment of environmental impacts we also identified relevant mitigation measures. Our approach to mitigation is based on the hierarchy of avoid, reduce, remedy and compensate. Where appropriate we also look to enhance environmental features.

Monitoring the effectiveness of the Plan

A framework for monitoring the environmental outcomes of the Plan is set out in the Monitoring section of this report. To ensure that it is effective the framework is based on the main SEA topics and sets out the objectives sought, the monitoring indicators to be considered within the trial exercise outlined, the responsible organisation, timescales and potential remedial action required.

Introduction

Purpose of this Environmental Report and key facts

As part of the preparation of On-Shore Wind Energy: Supplementary Guidance, the Highland Council is carrying out a Strategic Environmental Assessment (SEA). SEA is a systematic method for considering the likely environmental effects of certain PPS.

SEA aims to:

- integrate environmental factors into PPS preparation and decision-making;
- improve PPS and enhance environmental protection;
- increase public participation in decision making; and
- facilitate openness and transparency of decision-making.

SEA is required by the Environmental Assessment (Scotland) Act 2005. The key SEA stages are:

Screening	Determining whether the PPS is likely to have significant environmental effects and whether an SEA is required.	
Scoping	Deciding on the scope and level of detail of the Environmental Report, and the consultation period for the report – this is done in consultation with Scottish Natural Heritage, The Scottish Ministers (Historic Environment Scotland, formerly Historic Scotland) and the Scottish Environment Protection Agency.	
Environmental Report	Publishing an Environmental Report on the PPS and its environmental effects, and consulting on that report.	
Adoption	Providing information on: the adopted PPS; how consultation comments have been taken into account; and methods for monitoring the significant environmental effects of the implementation of the PPS.	**We are currently at this stage**
Monitoring	Monitoring significant environmental effects in such a manner so as to also enable the Responsible Authority to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action.	

The purpose of this Environmental Report is to:

- provide information on the On-shore Wind Energy: Supplementary Guidance
- identify, describe and evaluate the likely significant effects of the On-shore Wind Energy: Supplementary Guidance and its reasonable alternatives;
- provide an early and effective opportunity for the Consultation Authorities and the public to offer views on any aspect of (the earlier versions of) this Environmental Report.

Please note that the finalised Environmental Report retains references to the draft version of the Supplementary Guidance, because the assessment in the revised Environmental Report related particularly to that. The report records the early and effective strategic assessment (and consideration) of environmental effects as part of an iterative process informing decision-making on the contents of the guidance.

Key facts about the On-shore Wind Energy: Supplementary Guidance

Name of Responsible Authority
The Highland Council (THC)

Title of Plan, Programme or Strategy
On-shore Wind Energy: Supplementary Guidance

Subject (e.g. transport)
On-shore Wind Energy

Purpose and or objectives of the PPS
The purpose of the guidance is to provide a spatial framework and guidance for assessing applications for On-shore wind energy developments as a supplement in particular to Policy 67 – Renewable Energy of the Highland-wide Local Development Plan (HwLDP).

What prompted the On-shore Wind Energy: Supplementary Guidance (e.g. legislative, regulatory or administrative provision)

Scottish Planning Policy 2014 (SPP) states that "planning authorities should set out…a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms…", and that "development plans should also set out criteria that will be considered in deciding all applications for wind farms of different scales".

The Highland Council set out to respond to the increasing need and development of renewable energy by setting out a vision in the Highland Renewable Energy Strategy (May, 2006). With the modernisation of the Scottish planning system, national and Highland policy evolved, and the onshore wind energy industry in the region grew. Therefore the Council developed guidance dealing specifically with onshore wind energy. The Onshore Wind Energy Interim Supplementary Guidance was approved as a material consideration in March 2012, supplementing the HwLDP and superseding certain parts of the Highland Renewable Energy Strategy. This Guidance ensured regulatory compliance with the then current National Planning Framework 2 (NPF) and Scottish Planning Policy (SPP). Since that Interim SG was prepared, a new NPF and SPP have been published (June, 2014), the onshore wind energy industry in the region has grown, and the need to provide up to date, relevant and specific guidance has become increasingly important. Therefore the new Draft SG is being prepared to ensure Highland Council policy is compliant with NPF3 and SPP 2014, deals with the contemporary issues and challenges of the industry (including potential impacts, as well as supporting the industry during a time of shifting economic support mechanisms), and provides a clear vision and strategy for the development of onshore wind energy in Highland to continue to make a growing contribution to achievement of national targets for renewable energy generation.

Period covered by PPS
2015 onwards – note that the Draft Supplementary Guidance is a material consideration in decision-making but it will only be part of the Development Plan once the finalised version has been statutorily adopted, which at the earliest will be Summer 2016.

Frequency of updates
The Supplementary Guidance will be updated as required and at least every 5 years inline with the Highland-wide Local Development Plan.

Area covered by PPS
The guidance will be applicable to all planning applications, and applications under Section 36 of the Electricity Act 1989 for on-shore wind energy developments in the Highland Council's development planning area (the area covered by the Highland-wide Local Development Plan).


Area covered by HwLDP
Cairngorms National Park will produce a seperate LDP

SEA activities to date

The table below summarises the SEA activities to date in relation to the Onshore Wind Energy: Supplementary Guidance, together with some key stages in evolution of the SG.

SEA Action/Activity	When carried out	Evolution Stages of SG
		Draft Onshore Wind Energy SG consulted on April to June 2011.
Screening to determine whether the PPS is likely to have significant environmental effects	**N/A – The PPS falls under the scope of Section 5(3) of the Act and requires an SEA under the Environmental Assessment (Scotland) Act 2005. No Screening was undertaken and it moved straight to scoping**	
Scoping the consultation periods and the level of detail to be included in the Environmental Report	**A Scoping Report was submitted in July 2011**	
		Interim Onshore Wind Energy SG (March 2012), informed by ongoing SEA.
Outline and objectives of the PPS	**An Environmental Report was published and consulted on with the Consultation Authorities and the public from 23 August to 4 October 2012.**	Draft Small Scale Wind Turbine Proposals SG consulted on from 23 August to 4 October 2012, informed by ongoing SEA.
Relationship with other PPS and environmental objectives	**See above.**	
Environmental baseline established	**See above.**	
Environmental problems identified	**See above.**	
Assessment of future of area without the PPS	**See above.**	
Alternatives considered	**See above.**	
Environmental assessment methods established	**See above.**	
Selection of PPS alternatives to be included in the environmental assessment	**See above.**	
Identification of environmental problems that may persist after implementation and measures envisaged to prevent, reduce and offset any significant adverse effects	**See above.**	
Monitoring methods proposed	**See above.**	
Consultation timescales	**See above.**	

• Timescale for Consultation Authorities • Timescale for public consultation		
Notification/publicity action	**See above.**	
		Interim Small Scale Wind Turbine Proposals SG (November 2012), informed by ongoing SEA.
		Pre-Consultation on wind energy issues “Planning for Onshore Wind Energy” (carried out alongside the Caithness and Sutherland Local Development Plan Main Issues Report consultation, November 2014 to February 2015).
		Spatial Planning for Onshore Wind Energy in Highland – Consultation Paper, informed by ongoing SEA including comments on Environmental Report, consulted on 16 March to 22 May 2015.
Preparation of Revised Environmental Report, including consideration of comments received on earlier Environmental Report.		
	Revised Environmental Report published and consulted on with the Consultation Authorities and the public from 25 September 2015 to the extended deadline of 29 January 2016.	**Draft SG (covering both larger and smaller wind energy developments), informed by SEA, published for consultation from 25 September 2015 to the extended deadline of 29 January 2016.**
Preparation of Finalised Environmental Report (for publication alongside SG intended for adoption), including consideration of comments received on earlier Revised Environmental Report.	**February 2016 to September 2016.**	
		Finalised Supplementary Guidance prepared February 2016 to September 2016, including consideration of comments received on Draft SG and implications of SEA and HRA – approved for submission to adoption process.

Drafting of SEA Post-Adoption Statement.	**September 2016.**	

The Supplementary Guidance

Outline and objectives of the On-Shore Wind Energy: Supplementary Guidance

The Supplementary Guidance forms part of the Highland wide Local Development Plan (HwLDP), supplementing key principles that are set out in policy.

Consultation Authorities will be aware that a draft Onshore Wind Energy SG was published for consultation from April to June 2011 and a draft Small Scale Wind Turbine Proposals SG was published for consultation from 23 August to 4 October 2012. Furthermore, Pre-Consultation was subsequently undertaken on wind energy issues "Planning for Onshore Wind Energy" (carried out alongside the Caithness and Sutherland Local Development Plan Main Issues Report consultation, November 2014 to February 2015), followed by "Spatial Planning for Onshore Wind Energy in Highland – Consultation Paper" consulted on 16 March to 22 May 2015.

The evolution of the SG has not been straightforward. It has been influenced significantly by changes in national policy and advice that have occurred on more than one occasion during preparation of the SG, requiring changes to be made to the SG itself. Furthermore, there have been a number of national mapping exercises being advanced concurrently, which will be important to the consideration of environmental effects, and we have sought to input to those exercises and to take them into account. Additionally, substantial efforts have been made by the Council working with SNH, other stakeholders and consultants, to address landscape and visual issues including cumulative effects and, most recently, to begin identifying strategic capacity for windfarms and areas of greatest potential for wind energy development.

The following provides a brief chronology:

- Highland Renewable Energy Strategy (2006).
- MacRoberts LLP and Enviros Consulting Ltd (now SKM Enviros) were appointed by the Scottish Government to provide support and advice to planning authorities on the preparation of their supplementary planning guidance (SPG) for wind farms during the period between March 2008 and March 2009. The Council participated in discussions with the consultants, other authorities and relevant key agencies as part of that. The exercise particularly focussed on the development of Spatial Frameworks for windfarms over 20MW.
- Macaulay Land Use Research Institute "Assessment of Landscape Sensitivity to Wind Turbine Development in Highland – Summary Report" (September 2010), undertaken for the Council, the Cairngorms National Park Authority and Scottish Natural Heritage.
- The development of Draft SG was also informed by further work that the Council undertook, in consultation with SNH, focussing initially on the Monadhliath area and Caithness area as pilots, making use of the Macaulay Report along with additional materials from the Macaulay study. The results of that exercise were provided in Appendix 1 of the Council's Draft SG.
- Draft Supplementary Guidance – Onshore Wind Energy (consultation April to June 2011). The spatial framework in the Draft SG was prepared following the methodology set out in Scottish Government's SPP6 and in PAN45 Annex 2.
- "Background Paper to the Highland Council's Draft Onshore Wind Energy Supplementary Guidance, April 2011".
- SEA Scoping (July 2011).

- Summer 2011 to Winter 2011/12 – ongoing meetings with SNH and CNPA.

- Interim Supplementary Guidance – Onshore Wind Energy (March 2012). The spatial framework in the Interim SG was prepared following the revised methodology in Scottish Government's Specific Advice Sheet "Process for preparing spatial frameworks for wind farms" (February 2011).

- Draft Supplementary Guidance – Small Scale Wind Turbine Proposals (consultation 23 August 2012 to 4 October 2012).

- Summer/Autumn 2012 - further discussions on landscape and visual issues with SNH.

- SEA Environmental Report (consultation 23 August 2012 to 4 October 2012).

- Interim Supplementary Guidance – Small Scale Wind Turbine Proposals (November 2012).

- NPF3 and SPP. Finalised June 2014. "Onshore Wind – some questions answered" (December 2014). (NB. NPF3 and SPP were subject of SEA.)

- Wild Land Areas (finalised June 2014; descriptions and guidance on assessing proposals is awaited).

- LUC "Cumulative Landscape and Visual Assessment of Wind Energy in Caithness" (July 2014). LUC's Draft Ardross area work.

- Pre-Consultation on wind energy issues "Planning for Onshore Wind Energy" (carried out alongside the Caithness and Sutherland Local Development Plan Main Issues Report consultation, November 2014 to February 2015).

- Carbon Rich Soils, Deep Peat and Priority Peatland Habitat (consultation January – March 2015).

- Spatial Planning for Onshore Wind Energy in Highland – Consultation Paper (consultation from 16 March to 22 May 2015). The spatial framework in the Consultation Paper was prepared following the revised methodology in Scottish Government's SPP (2014).

- SNH advice "Spatial Planning for Onshore Wind Turbines – natural heritage considerations" was finalised in June 2015.

- Ongoing strategic capacity work, starting with Loch Ness study area.

- SEA Revised Environmental Report prepared, including consideration of comments received on earlier Environmental Report, and consulted on (consultation 25 September 2015 to extended deadline of 29 January 2016).

- Draft Supplementary Guidance (2015) prepared, including consideration of comments on Consultation Paper (2015), covering both larger and smaller wind energy developments, and consulted on (consultation 25 September 2015 to extended deadline of 29 January 2016, alongside consultation on the Highland-wide Local Development Plan Main Issues Report).

The purpose of the guidance is to guide development of on-shore wind energy development to the right locations based upon a spatial framework in order to comply with Scottish Planning Policy.

In carrying out SEA of the On-shore Wind Energy: Supplementary Guidance and acknowledging the previous consultation on the guidance, changes to national policy and ongoing national and local workstreams dealing with environmental issues for planning (see list above), the Council decided that the Supplementary Guidance required revision. The Council considered that the revised Supplementary Guidance should be informed not only by the national policy and national and local workstreams but also by a revision to the earlier Environmental Report.

Subsequent to that, there have been the following milestones (some iterative processes being undertaken in parallel with each other):

- Carbon Rich Soils, Deep Peat and Priority Peatland Habitat (mapping finalised June 2016).

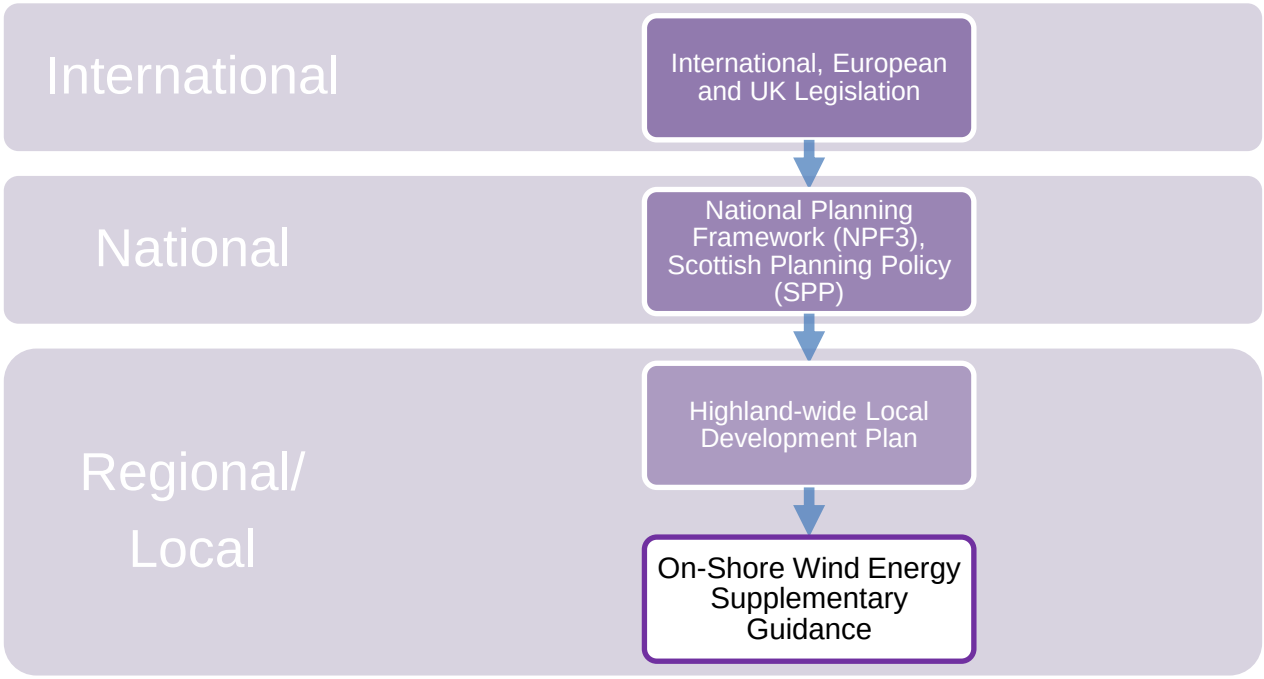
- Habitats Regulations Appraisal (HRA) undertaken in respect of the SG, HRA Record prepared and signed off by SNH.

- SEA Finalised Environmental Report prepared, including consideration of comments on Revised Environmental Report, and SEA Post-Adoption Statement drafted.

- Finalised Supplementary Guidance prepared, including consideration of comments received on Draft SG and implications of SEA and HRA – approved for submission to adoption process.

Relationship with other PPS and environmental protection objectives

Schedule 3 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report includes an outline of the PPS relationships with other relevant PPS, and how environmental protection objectives have been taken into account in the PPS preparation. This section covers these issues and describes the policy context within which the PPS operates, and the constraints and targets that this context imposes on the PPS.



The key **environmental objectives** to be considered in the assessment and preparation of the On-shore Wind Energy: Supplementary Guidance, as identified in Appendix 3, includes:

- **Biodiversity, flora and fauna**: Highland Council has a duty to further the conservation of biodiversity under the Nature Conservation (Scotland) Act 2004
- **Population and human health:** The Environmental Protection Act (1990) sets out the powers and duties that Highland Council has to address statutory nuisance, this includes noise. Planning Advice Note 65: Planning and Noise also sets out how Local Authorities should apply their Planning powers to manage impacts of noise. Shadow Flicker is also an issue to be addressed, through technical guidance set out in the Draft SG. Public access has multiple benefits for the population, including benefits to health and economic activity. It is a topic that could also fit with material assets. The Land Reform (Scotland) Act 2003 places a statutory duty with Local Authorities to uphold access rights. Whilst wind energy developments may have adverse effects on access, they also have potential to improve or increase access to otherwise inaccessible places.
- **Climatic factors**: The Climate Change (Scotland) Act 2009 sets out a framework for the reduction of greenhouse gas emissions and a transition to a low carbon economy. The Act introduces a new duty to all public sector bodies to exercise their functions in a way that is best calculated to contribute towards GHG targets of 80% reduction by 2050 with an interim target of 42% by 2020.
- **Material assets:** The Land Reform (Scotland) Act 2003 places a statutory duty with Local Authorities to uphold access rights. The Scottish Forestry Strategy (2006) sets out targets to increase woodland cover in Scotland to 25% of the total land area. A National Peatland Plan is currently being prepared by SNH.

- **Water**: The Flood Risk Management (Scotland) Act provides a statutory framework for delivering a sustainable and risk-based approach to managing flooding. Highland Council has a responsibility under the Act to exercise its functions with a view to managing and reducing flood risk and promotion of sustainable flood risk management.
- **Soil:** Protecting and supporting the enhancement of carbon rich soils and good agricultural land such together with respecting designations such as North West Highland European Geopark.
- **Cultural heritage**: National and regional policy sets out the principles which must be followed in order to care for, protect and enhance our historic environment.
- **Landscape**: The landscape is a defining feature of the area and the Council has a duty to have regard to the desirability of conserving the natural heritage of Scotland under the Countryside (Scotland) Act 1967.

The relevant PPS and associated environmental objectives to be considered in the Environmental Report are shown below. PPS above the national level have typically not been outlined in detail primarily because the environmental protection framework provided by European legislation has been integrated into national and regional plans, policies and guidance.

There is a wide range of guidance available from DECC, SNH and SEPA. We have not attempted to list all of these but the key documents are signposted in the Draft Supplementary Guidance with full references provided in an appendix.

Legislation, Plans, Programmes or Strategies	Summary of relevant Environmental Objectives to be reflected in the Onshore Wind Energy SG
Biodiversity, Flora and Fauna	
Ramsar Convention (Convention on Wetlands of International Importance especially as Waterfowl Habitat) ⇓ EU Birds Directive & EU Habitats Directive ⇓ Habitat Regulations	The Habitats Regulations transpose the provisions of the EU Habitats and Birds Directives into Scottish Law and require that Local Development Plans are subject to HRA of their implications for Natura sites. Habitats Regulations also requires protection for European protected species.
Wildlife and Countryside Act 1981 (as amended) Nature Conservation (Scotland) Act 2004 Wildlife and Natural Environment (Scotland) Act 2011 Protection of Badgers Act 1992	To further conservation of biodiversity consistent with the proper exercise of its functions and protect and enhance precious natural features and wildlife. To prevent the release and spread of non-native animal and plant species into areas where they can cause damage to native species and habitats and to economic interests.
Convention on Biological Diversity ⇓ UK Biodiversity Action Plan/ Scottish Biodiversity Strategy (Scotland's Biodiversity – It's In Your Hands) ⇓ Highland Biodiversity Action Plan (2010-13)	Conserve species and habitats that are considered vulnerable or threatened on a local, regional or national basis, and in turn contribute to the conservation of our global biodiversity; promote awareness of local natural resources; promote community engagement in, and ownership of, the practical conservation of natural resources; and promote the sustainable and wise use of resources.

Scottish Forestry Strategy (2006) ⬇ Control of Woodland Removal Policy ⬇ Highland Forest and Woodland Strategy	Environmental objectives include reducing the impact of climate change; making access to and enjoyment of woodlands easier for all to improve health; protect the environmental quality of our natural resources; and help to maintain, restore and enhance Scotland's biodiversity.
Population & Human Health	
Land Reform (Scotland) Act 2003 ⬇ Highland Council Core Paths Plan (2011)	Establishes the statutory rights of access to land and inland water for outdoor recreation. Prepared under the Act, the Core Paths Plan provides a system of path in Highland which, as a whole, gives the public reasonable access throughout the plan area.
Soil	
Scottish Soil Framework (2009) ⬇ Scotland's National Peat Plan (2014) ⬇ North West Highland Geopark and Lochaber Geopark ⬇ Other Geological SSSIs	To promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland, achieved through targeted activities including reducing soil erosion; greenhouse gas emissions from soil; and contamination. Manage, protect and restore peatlands to maintain their natural functions, biodiversity and benefits. North West Highlands Geopark and Lochaber Geopark are internationally important environments requiring appropriate recognition alongside other geological SSSIs within Highland.
Water	
EU Water Framework Directive ⬇ Water Environment and Water Services (Scotland) Act 2003 (WEWS) Act ⬇ Scotland River Basin Management Plan (2009)	To prevent deterioration in the status of the water environment, including rivers, lochs, estuaries, coastal waters and groundwaters and protect, enhance and restore all surface water bodies to 'good' status.
EU Floods Directive ⬇ Flood Risk Management (Scotland) Act 2009	To reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity through improved assessment and the sustainable and coordinated management of flood risk. The Act imposes a new duty on local authorities to exercise their flood risk related functions with a view to reducing overall flood risk and establishes the requirement to prepare plans to manage flood

	risk which will provide a framework for coordinating actions across catchments to deal with all forms of flooding and its impacts.
Climatic Factors	
Climate Change (Scotland) Act 2009  Land Use Strategy : Getting the best from our land  Adapting to the Impacts of Climate Change in Highland (2012)	The Act introduces a new duty on the Council (and all public bodies) to exercise their functions in a way that is best calculated to contribute towards the greenhouse gas reduction targets of reducing emissions by at least 80 per cent by 2050. A national land-use strategy has been prepared under the Act. This identifies key principles for the sustainable use of land, including: encouraging land uses which deliver multiple benefits; land highly suitable for primary uses should be recognised in decision-making; and examining options for restoring derelict or vacant land should be a priority. The Council's own strategy sets out how it will mitigate against the causes of climate change and adapt to the likely impacts.
Material Assets	
Highland Council Local Transport Strategy Highland Council Core Paths Plan (2011) Active Travel Masterplans and Long Distance Routes (Including the National Cycle Network)	The Local Transport Strategy guides investment and decisions on transportation infrastructure and aims to promote more sustainable and active travel. The Core Paths Plan, Active Travel Masterplans and Long Distance Routes provide a network of paths in Highland which collectively provide communities and tourists with attractive, diverse and sustainable access connections throughout the plan area.
Historic Environment and Cultural Heritage	
Scottish Historic Environment Policy (SHEP)	The three key outcomes presented in the Policy are that the historic environment is cared for, protected and enhanced for the benefit of our own and future generations; greater economic benefits from the historic environment; and that the people of Scotland and visitors to our country value, understand and enjoy the historic environment.
Our Place in Time - The Historic Environment Strategy for Scotland	Sets out the 10 year vision for Scotland's historic environment and how its cultural, social, environmental and economic value contributes to the nation and its people.
Landscape	
Countryside (Scotland) Act 1967 European Landscape Convention 2004	To promote the protection, management and planning of all landscapes, including natural, managed, urban and peri-urban areas, and special, everyday and also degraded landscape.

Scotland's Scenic Heritage (1978) Special Qualities Reports for National Scenic Areas (2010) Emerging National Scenic Area Management Strategies Assessment of Highland Special Landscape Areas (2011) Highland Coastal Strategy	
Wildness in Scotland's Countryside Policy Statement 02/03  Wildness Qualities Mapping Wild Land Areas (2014)	To protect the elemental qualities of some of Scotland's most remote mountain and coastal areas which many people derive psychological and spiritual benefits.
Other Relevant PPS	
National Planning Framework 3 (2014)	The National Planning Framework 3 aims to guide Scotland's development to 2030 and sets out strategic development priorities to support the Government's goal of sustainable economic growth. The Framework will play a key role in co-ordinating policies with a spatial dimension and will help move Scotland towards a low carbon economy.
Scottish Planning Policy (SPP) (including Circulars and PANs)	SPP sets out the Scottish Government's planning policy on nationally important land-use planning matters. This places planning within the wider context of the Scottish Government's overarching aim to increase sustainable economic growth.
Single Outcome Agreement 3 (SOA3)	Single Outcome Agreement 3 delivers a partnership approach to tackling issues which affect Highland.
Highland-wide Local Development Plan (HwLDP)  Supplementary Guidance	To continue to provide a strong platform for economic growth, together with adequate levels of housing and community facilities while also protecting and conserving the built and natural environment.
Programme for the Highland Council 2015 – 2017: Highland First	The Council sets out what it wishes to achieve and outlines its political commitments and priorities under three main themes: Community Led Highland; Well-Served Highland; A Fairer Highland. This will be complemented by area-specific actions (e.g. for Inverness City) and the programme will run along with the commitments set out in the previous programme "Working together for the Highlands". Protecting and enhancing the environment, a more efficient transportation network and improving sustainability are important considerations.

By carrying out this analysis it has facilitated the development of Supplementary Guidance which gives due consideration of the necessary plans, policies and strategies which may affect and those which may be affected by the On-Shore Wind Energy: Supplementary Guidance.

Relevant aspects of the current state of the environment

Schedule 3 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report includes a description of "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme", and "the environmental characteristics of areas likely to be significantly affected". A core purpose of the SEA process is identifying the current baseline environmental conditions together with fully understanding the issues, problems and trends of relevance to the PPS. Appendix 2 identifies the relevant datasets used to form the baseline for this assessment.

The purpose of this section is to provide enough environmental baseline data to:

- support the identification of environmental problems;
- support the process of assessing the environmental effects; and
- provide a baseline against which future monitoring data can be compared.

This section of the Environmental Report is split by SEA Topic as defined by the Environmental Assessment (Scotland) Act 2005. Tables and maps showing baseline data can be found in Appendix 2.

General

The Highland Council covers an area of 24,493 sq kms (above the high water mark) of which, 945 sq kms (3.9%) is open water.

Biodiversity, Flora and Fauna

Natural heritage designations cover a range of habitats in Highland. The table[1] below provides a breakdown of the designations which lie within and/or intersect with the Highland area:

Designation	Number of Sites	Area Covered (Ha)
Ramsar Sites	11	152,300
Special Area of Conservation (SAC)	89	552,954
Special Protection Area (SPA)	44	384,000
Sites of Special Scientific Interest (SSSI)	348	514,370
National Nature Reserve	18	50,800
Local Nature Conservation Sites	1	17
Scottish Wildlife Trust Sites	1	2,990
Ancient Semi-Natural	5,037	56,300

1 *Note: This information is Highland-wide and many designations may overlap. Figures quoted for SAC's and SSSIs include sites which intersect the Highland-wide boundary, however, these may extend into neighbouring planning authority areas and therefore the areas quoted extend beyond Highland. The nature conservation marine protected areas intersect Highland's coastline and cover a much wider area, much of which is outwith our terrestrial and marine planning jurisdiction.*

Woodland		
Native Woodland and Nearly Native Woodland	22,782	103,608
Plantations on Ancient Woodland Sites	1,596	14,944
Tree Preservation Orders	128	575
Nature Conservation Marine Protected Areas	8	1,266,075
Seal Haul-out Areas	35	22,182

Highland supports 15 of the 65 (c.25%) priority habitats of conservation importance in Scotland with over half of their Scottish distribution area in Highland. Highland also supports 864 of 1149 (75%) of the priority species of conservation importance in the UK.

Highland's marine and coastal environment forms a rich, biodiverse boundary with our terrestrial planning considerations. The Council shall therefore ensure that the designated sites and protected species within these environments are appropriately safeguarded to protect our rich natural heritage, in line with our requirement to ensure integrated marine and land planning.

The following habitats occur in Highland and are priority habitats in the UK Biodiversity Action Plan:

- Ancient and/or species rich hedgerows
- Blanket bog
- Blue mussel beds
- Calaminarian grasslands
- Carbonate mounds
- Cereal field margins
- Coastal and floodplain grazing marsh
- Coastal saltmarsh
- Coastal sand dunes
- Coastal vegetated shingle
- Deep sea sponge communities
- Estuarine rocky habitats
- Eutrophic standing waters
- Fens
- File shell beds
- Fragile sponge & anthozoan communities of subtidal rocky habitats
- Inland rock outcrops and scree habitats
- Intertidal boulder communities
- Limestone pavements
- Lowland calcareous grassland
- Lowland dry acid grassland
- Lowland heathland
- Lowland meadows
- Lowland wood pasture and parkland
- Machair
- Maerl beds
- Martime cliffs and slopes
- Mestotrophic lakes
- Mountain heaths and willow scrub
- Mud habitats in deep water
- Mudflats
- Native pinewood
- Oligotrophic and dystrophic lochs
- Open mosaic habitats on previously developed land (brownfield sites)
- Ponds
- Purple moor grass and rush pasture
- Reedbeds
- Rivers
- Saline lagoons
- Seagrass beds
- Seamount communities
- Sheltered muddy gravels
- Tidal rapids
- Traditional orchards
- Upland calcareous grassland
- Upland flushes, fens and swamps
- Upland hay meadows
- Upland heathland
- Upland mixed ashwoods
- Upland oakwood
- Wet woodland

The protected species known to be found in Highland are listed in Appendix 2 of the Statutorily Protected Species Supplementary Guidance. Many sections of the coastline are important for breeding seabirds.

Wild Deer are an important element of Scotland's biodiversity and ecology, an economic asset and valued as an iconic species. They are present across large parts of Highland.

Population and Human Health
The population of Highland in 2011 was 232,100 with a population density of 8.7 people per sq km which is substantially lower than the Scottish average of 67.4. Highland has witnessed steady growth over the last 30 years, with an 11.1% increase in population since 2001. The area presents a rather skewed population demographic, with the loss of younger people as they move away for higher and further education, combined with a population older than the Scottish average.

Soil
Given the scale of Highland and the diversity of its landscape and uses there are a wide range of soil types. Most Highland soils are very shallow, often due to shallow parent minerals. In some areas of Highland, soil erosion is a significant issue. Peat is very common throughout Highland and Caithness and Sutherland contains one of the largest and most intact areas of blanket bog in the world, supporting a distinctive wildlife community. Peat is important in terms of its carbon storage properties and the habitats (many of which are water dependent) which it provides. The removal and disturbance of peat can mean the stored carbon is released and may contribute to climate change. Two of the Scotland's three UNESCO European Geoparks also lie within the Plan area. These are the Lochaber Geopark and the North West Highlands Geopark. There are also 77 other geological SSSIs and 403 un-notified Geological Conservation Review sites (GCRs).

In terms of land capability for agriculture, prime agricultural land within Highland is restricted to just 26,414Ha (1% of Highland) all within the Inner Moray Firth area. Much land is at the lower end of the land capability range, mostly ranging between Class 6 and 7. Within these areas severe climates contribute to inhibiting agricultural capability, meaning potential land uses are generally limited to improved grass land and rough grazing, although with mechanical intervention it can be possible to allow seeding, rotovation or ploughing.

Water
The quality of the freshwater environment in Highland is recognised internationally for its importance as a spawning ground for wild salmon and use by the whisky industry. The many lochs and rivers that characterise the area are important for local economies and provide the scenic backdrop that encourages so many tourists to the area. The increased population within the Inner Moray Firth area and redevelopment of ports and harbours to support the on and offshore renewables industry, as well as additional hydro schemes are placing additional pressure on the water environment. The River Basin Management Plan (RBMP) Area Management Plans provide valuable baseline information on the quality of water in Highland.

Climate Change
In Highland one of the main contributors to climate change is transportation due to the emissions of carbon dioxide. High levels of CO2 and other "greenhouse gases" in the atmosphere are thought to accelerate the Earth's climate change. Climate change is predicted to have a variety of environmental consequences including increased frequency and severity of storm events, as well as rises in sea level, which may have an affect on the coastal communities throughout the plan area. Changes in rainfall patterns could lead to increased erosion and pollution associated with surface run-off.

Material Assets
There are several potential conflicts between onshore wind energy and material assets that the Draft SG, needs to balance. The Scottish Forestry Strategy (2006) sets out targets to increase woodland cover in Scotland to 25% of the total land area, in many areas of Highland this places

wind energy in competition with woodland. The carbon storage potential in Highland (both in the existing woodland and reserves of peat) are key carbon sinks that have to be carefully managed in relation to wind energy development. A National Peatland Plan is currently being prepared by SNH. Public access has multiple benefits for the population, including benefits to health and economic activity. It is a topic that could also fit with material assets. Whilst wind energy developments may have adverse effects on access, they also have potential to improve or increase access to otherwise inaccessible places.

In terms of access to the outdoors the Council's Local Transport Strategy 2010/11 – 2013/14 provides the key information on this valuable material asset including the level of access infrastructure as set out in the table below:

Access Resource	Distance (km)	%
Rights of Way	3,362	11.6
Promoted	3,959	13.6
Other Paths	8,331	28.7
Roads	13,401	46.1
Total	29,053	100

Cultural Heritage

The built heritage is made up of a number of components including archaeological sites, submerged landscapes, listed buildings, historic gardens and designed landscapes and conservation areas. The Council will seek to preserve and promote its built heritage as a valuable tourist, recreational and educational resource wherever possible. A break down of cultural and built heritage features in Highland are shown in the table below:

Designation	Number of Sites	Area covered (Hectares)
Schedule Monuments	1,201	1,101
Listed Buildings	A – 175 B – 1,121 C – 1,121	N/A
Gardens & Designed Landscapes	46	5,670
Conservation Areas	29	791
Inventory of Historic Battlefields	8	3,600
Historic Environment Record Sites (excluding find sites)	44,309	20,050

Landscape

Scotland has a rich diversity of landscapes. These landscapes have different capacities to accommodate development without significantly changing their character. Some of Scotland's finest landscapes can be found within Highland; It contains over a quarter of Scotland's National Scenic Areas and almost 40% of Scotland's Wild Land Areas. The West Highlands and Islands is dominated by rugged mountains, remote glens and long steep straths bordered by a coastline of sea lochs. The Inner Moray Firth area is home to a number of mountains and narrow firths, creating a sense of security for the more populated areas of Highland. The east coast contains several sandy beaches and broad flat coastal edges with prime agricultural farmland. The northern Caithness and Sutherland areas of the Plan contain an expansive coastline with dramatic cliffs, beaches and sea lochs. The topography throughout the north is highly important to the area, with a

strong sense of space and openness creating the "big sky country". In particular the flat landscape in Caithness is susceptible to large scale developments being highly visible.

The landscape qualities of Highland are a unique resource for both residents and visitors. Any development therefore has the potential to significantly affect these landscapes which presents a challenge in the need to achieve the right balance between development interests and maintaining the viability of remote settlements by safeguarding the areas associations as a natural and untouched resource. In considering this landscape capacity balance, due regard also requires to be taken of the 25 Wild Land Areas contained within Highland as well as the numerous other landscape designations set out in the table below:

Designation	Number of Sites	Area covered (Hectares)	Proportion of Highland area
Special Landscape Area	27	510,510	20.8%
National Scenic Area	15	492,850	20.1%
Wild Land Area	25	1,001,426	40.9%
Unspoilt Coast (based on 'Isolated Coast' defined within the Highland Coastal Strategy)	209	940 kms	34% of Highland's coastline
Inter-Relationship Between Topics - Remaining Area of Highland not covered by landscape designations	N/A	1,281,600	52%

In addition to the above it is noted that National Planning Framework 3 identifies the A82 and A9 trunk roads north as far as Inverness as Scenic Corridors.[NB. Whilst the Draft SG included reference to these, following comment from Scottish Government that NPF3 Scenic Routes are not specifically a constraint to windfarm development that reference is excluded from the finalised SG.] Also it is noted that the Cairngorms National Park lies outside, but immediately adjacent, the area to be covered by the Supplementary Guidance.

Gaps/Unreliability of Baseline Data

Much data and information was available through the Consultation Authorities, the Scottish Government and there was a wealth of information on offer to the Highland Council to inform the baseline data for this Environmental Report. However, there are a number of factors which can limit the validity of this data:

- Some parts of Highland have been studied more widely than others. Therefore, the quality and accuracy of information for some areas will be greater than for others;
- The data relevant to this Report is held in different forms. If information is held in databases and Geographic Information Systems it can be more easily queried than information which is only in the printed form in reports, books or even on websites.

Environmental problems

Schedule 3 paragraph 4 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report includes a description of existing environmental problems, in particular those relating to any areas of particular environmental importance. The purpose of this section is to explain how existing environmental problems will affect or be affected by the On-shore Wind

Energy: Supplementary Guidance and whether the supplementary guidance is likely to aggravate, reduce or otherwise affect existing environmental problems.

The key facts and the baseline information collated for this Environmental Report has helped us to identify some environmental problems which are applicable to Highland. Environmental problems that affect the area are identified in the table below. Some of the negative trends highlighted in this table are likely to continue if the Supplementary Guidance is not brought forward. The environmental problems have been identified using the baseline data and information provided in Appendix 2.

Environmental Problems Relevant to On-shore Wind Energy: Supplementary Guidance

SEA Issue	Potential Environmental Impact resulting from On-shore Wind Energy: Supplementary Guidance	Implications for On-shore Wind Energy: Supplementary Guidance
Biodiversity, flora, fauna	Dependant on proposals for wind energy coming forward, less stress on biodiversity and loss of habitat resulting from on-shore wind energy development as they will be steered away from areas where there would be significant constraints. Renewable energy development can reduce green house gases and in turn vulnerability of rare and endangered flora and fauna to changes in climate should be reduced in the longer term. Impact on birds through potential disturbance to breeding or roosting/feeding areas and potential collision risk.	The guidance needs to ensure that it aims for protection and enhancement of Biodiversity, Flora and Fauna. Sites of specific importance should be included in the mapping exercise of the spatial framework. It is likely that there will be a significant impact on this SEA issue.
Population and human health	Population potentially given greater opportunity to access the outdoors through improved access (or at least safeguarding existing access) which may be brought forward through on-shore wind energy development guidance.	On-shore wind farm development can provide opportunities to come into contact with the natural environment through better recreational access. It is likely that in time there will be a significant impact on this SEA issue.
	Potential for additional noise, shadow flicker and other risks associated with on-shore wind farm developments.	The guidance will seek to ensure that amenity impact of wind farms is taken into consideration during the consideration of planning application for on-shore wind energy developments.
Soil	Any on-shore wind energy development will have some impact on soil and geology however this is likely to vary across areas where more significant features are present (i.e. peat).	The guidance will seek to guide developments away from areas where there are valuable features which are likely to be significantly negatively impacted by on-shore wind energy development.
Water	Development of on-shore wind energy is likely to have some impact on water. The guidance has a role to play in promoting early consideration of the issue.	The guidance will highlight the need to protect and where possible enhance the water environment where ever possible.

Climatic factors	On-shore wind energy development can significantly contribute to the targets for proportion of energy demand to be met from renewable sources.	The guidance will provide a framework for the development of on-shore wind energy in Highland, guided by principles in Scottish Planning Policy helping identify capacity for more wind farms.
Material assets	Development may have an effect (both positive and negative depending on the location/scale of development) on material assets including access to the outdoors, transport and forestry.	The guidance will aim to guide development to areas where there will be limited negative impact and attempt to deliver positive impact on material assets.
Cultural heritage	Reduced risk of impact on the setting for cultural heritage features.	The spatial framework should generally steer development from areas which may have an adverse effect on cultural heritage features.
Landscape	Avoid the degradation of local and regional landscape character which may occur through the development of on-shore wind energy developments and maintain local distinctiveness. This may include impacts on wildland, areas with limited landscape capacity, designated landscape areas, settlements and the cumulative impact on these issues.	The guidance should be used as a positive tool to steer on-shore wind energy developments to areas where they will not have a significant adverse impact on the local and regional landscape character and local distinctiveness.

Potential Environmental Implications without On-shore Wind Energy: Supplementary Guidance

The Supplementary Guidance will set out how the Highland Council will manage proposals for onshore wind energy developments. It will form part of the Highland Wide Local Development Plan (HwLDP), supplementing key principles that are set out in policy. It provides a fuller interpretation of HwLDP policies as they relate to onshore wind energy development. Without the Supplementary Guidance, onshore wind energy developments would be assessed against HwLDP policies with no extra interpretation. As a result, it would be less clear for applicants about what is expected from them and development may have detrimental and unsustainable impacts on the environment and will not help to address existing environmental problems.

Assessment Approach and Methodology

Assessment of Environmental Effects

Assessment methodology

The baseline environmental information from the previous section is applied to consider whether the Onshore Wind Energy: Supplementary Guidance and its alternatives are likely to have significant environmental effects (positive and negative). To ensure the strategic environmental assessment of the on-shore wind energy supplementary guidance is practical and proportionate a scoping exercise was carried out to determine which parts of the guidance should be subject to SEA individually. However since then SPP has set out a new spatial framework which must be followed so the Onshore Wind Energy: Supplementary Guidance has been revised to reflect this. The supplementary guidance is broken down into sections. The table below sets out the sections of the Draft SG and whether they will be subject to SEA assessment [NB. The structure of the finalised SG document differs in some respects.]:

Scoping sections of the guidance for SEA

Section of Guidance	Will it be subject to SEA?	Justification
Introduction	N	This section is for background information only and in itself will have no effect on the environment.
Key Development Plan Considerations	Y	This section sets out how important features and assets, safeguarded through HwLDP are expected to be safeguarded in relation to wind energy developments
Highland Strategic Capacity	Y	This section sets out the approach that will be taken to study areas rather than the outputs of any analysis of study areas.
Advice for Small-scale Developments	Y	This section sets out additional detail to support smaller-scale proposals
Further Technical Information	Y	This section deals with landscape and visual impacts.
Loch Ness Landscape Sensitivity	N	The methodology followed which is set out within the section “Highland Strategic Capacity”, together with the criteria set out in the section “Further Technical Information”, will both be subject to SEA. On that basis therefore, the area-specific landscape sensitivity assessment will not be subject to SEA.

The Spatial Framework appeared in the Consultation Paper (2015) and comments received were taken into account in preparing the version appended to the Draft SG (2015). At the time of consultation on the Draft SG (which ran alongside consultation on the Main Issues Report for the review of the Highland-wide Local Development Plan) the Council was minded to include the spatial framework in HwLDP2 policy. Whilst that remains our longer term intention, the spatial framework has been included in the finalised SG for adoption as part of the Development Plan now. SPP, which was subject of SEA, sets out the methodology for preparation of the spatial framework. SPP is prescriptive on this matter: the Council must follow it and has no scope to add to it or make other

amendments. Therefore though the spatial framework is mapped by the Council it is determined by SPP. In view of these circumstances, the Council's spatial framework for Highland has not been subject to SEA, although it may be noted that written guidance on particular features included within it – covered under other sections of the SG – has been subject of SEA.

The sections for which it has been decided SEA is required have been assessed for their potential environmental effects against each of the SEA Objectives. Where there is a reasonable alternative for a section, it has also been assessed. The expected timescale and duration of any impact has been considered, including whether the impact would be over the short (0 to 5 years), medium (5 to 10 years) or long term (10+ years).

The assessment matrix used has changed from the one used in the last Environmental Report. We are taking a pragmatic approach and using the assessment matrix that has been used in more recent SEA work for assessing policies. This assessment matrix has been amended and adapted after discussions with the Consultation Authorities, during the preparation of the SEA of several recent Local Development Plans. The assessment matrix is used to assess the preferred options and alternatives for the various sections of the guidance and the overall cumulative assessment of the guidance.
The results of the detailed assessment of the sections of the guidance are set out below and the completed assessment matrices included at Appendix 3. The finalised assessment scoring has been carried out assuming that mitigation is already incorporated into the guidance. It should also be noted that all elements of the guidance will be taken into consideration when the guidance is being cumulatively assessed as a whole.

SEA Objectives
A number of objectives were identified at scoping stage. However three years has passed since the last Environmental Report was prepared for this Supplementary Guidance and during this time we have worked with the Consultation Authorities to refine the list of SEA Objectives to be used for Local Development Plans and Supplementary Guidance. Rather than using the older version of SEA Objectives used in the previous Environmental Report, we have decided to use the more up to date version.

Air has been scoped out as it is not considered that there will be significant impact on this SEA topic through this guidance. While on-shore wind energy development utilises the air it is not likely that it will have a detrimental effect on air quality, given the policy approach as set out in the Highland-wide Local Development Plan.

SEA Topic	SEA Objectives
Biodiversity, Flora and Fauna	To conserve and where possible enhance biodiversity and accord to the protection of valued nature conservation habitats and species
Population and Human Health	To improve the living environment for all communities and promote improved health of the human population
Soil	Safeguard the soil quality, geodiversity and improve contaminated land
Water	Manage and reduce flood risk and protect the water environment
Climatic Factors	Reduce greenhouse gases and contribute to the adaptation of the area to climate change
Material Assets	Manage, maintain and promote sustainable use of material assets

Cultural Heritage	Protect and enhance, where appropriate, the area's rich historic environment
Landscape	Protect and enhance the character, diversity and unique qualities of the landscape

Summary of Assessments of the sections of the Onshore Wind Energy Supplementary Guidance

The approaches and alternatives contained within the On-shore Wind Energy Supplementary Guidance have been assessed using the framework and methodology described earlier in this Environmental Report. A summary of the assessment findings are shown below, the full findings are shown in Appendix 3.

Key development plan considerations

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	+	+	**+**
2	+	+	**+**
3	+/-	+/-	**+/-**
4	+	+	**+**
5	+	+	**+**
6	+	+	**+**
7	+	+	**+**
8	**+**	**+**	**+**

Commentary: The key development plan considerations section provides a fuller interpretation of how important features and assets safeguarded through policies in HwLDP are expected to be safeguarded in relation to wind energy development. Whilst it is anticipated that this section will have a number of positive effects there may still be localised detrimental impacts of individual proposals, but it ensures that important features and assets are considered at planning application stage, with the extra detail provided in this section and not just relying on HwLDP policies. [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]

Highland Strategic Capacity

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	=	=	=
2	=	+	**+**
3	=	=	**=**
4	=	=	**=**
5	=	=	**=**
6	=	=	**=**
7	=	=	**=**
8	**=**	**+**	**+**

Commentary: The assessment is based on the approach that will be taken to study areas rather than the outputs of any analysis of study areas. It is anticipated that there could be positive effects on SEA Objectives 2 (human health) and 8 (landscape) in the medium and longer term once work is carried out on study areas.

Advice for Small-Scale Developments

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	=	=	**=**
2	+	+	**+**
3	=	=	**=**
4	=	=	**=**
5	+	+	**+**
6	=	=	**=**
7	=	=	**=**
8	**=**	**=**	**=**

Commentary: The Advice for Small Scale Developments section provides further advice for small scale development. It is anticipated that it will have a mostly neutral effect on the SEA Objectives but that there would be positive effects on SEA Objectives 2 (human health) and 5 (climate change).

Further Technical Information

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	=	=	=
2	=	=	=
3	=	=	=
4	=	=	=
5	=	=	=
6	=	=	=
7	=	=	=
8	=	=	=

Commentary: The majority of the further technical information section contains advice on planning process and information requirements to accompany planning applications. This material has not been included in the assessment. Only the text on Community Renewable Energy Developments is subject of this assessment. It is anticipated that there could be positive effects on SEA Objectives 2 (human health) and 5 (climate change).

Summary of Assessments of the Reasonable Alternatives to the sections of the Onshore Wind Energy Supplementary Guidance

Alternative Approach to Key Development plan considerations

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	+/-	+/-	+/-
2	+/-	+/-	+/-
3	-	-	-
4	+	+	+
5	+	+	+
6	=	=	=
7	+	+	+
8	+	+	+

Commentary: Some SEA objectives are not met in this section. Moreover, due to the age of the interim SG, a lot of the content is not up to date, not compliant with national policy, and does not take account of the ever-changing development pattern in Highland. Therefore the Draft SG addresses these issues, and provides more relevant and effective guidance.

Alternative Approach to Highland Strategic Capacity

No reasonable alternative is identified. This section of the Draft Supplementary Guidance is new and it is considered that there is no reasonable alternative approach.

Alternative Approach to Advice for Small-Scale Developments

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	=	=	**=**
2	=	=	**=**
3	=	=	**=**
4	=	=	**=**
5	-	-	**-**
6	=	=	**=**
7	=	=	**=**
8	**=**	**=**	**=**

Commentary: The alternative approach to Advice for Small Scale Developments, which is not have any additional guidance for small scale developments, would have a mostly neutral impact on the SEA Objectives however it is anticipated that there could be a negative impact on SEA Objective 5 (climate change).

Alternative Approach to Further Technical Information

It is considered that there is no reasonable alternative approach.

Assessment of cumulative and synergistic effects

In this section the Council have sought to assess the cumulative effect of the guidance as a whole. To do this we have used the SEA objectives (and their key considerations) to look at the effect the guidance will have as a whole. This is summarised below and full detail is provided in Appendix 3. The alternative cumulative assessment is to continue to rely on the March 2012 Interim Supplementary Guidance.

Cumulative Assessment

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	+	+	**+**
2	+	+	**+**
3	+/-	+/-	**+/-**
4	+	+	**+**
5	+	+	**+**
6	+	+	**+**
7	+	+	**+**
8	**+**	**+**	**+**

Commentary: It is anticipated that on a cumulative basis, the draft Supplementary Guidance as a whole, would have a positive environmental effect on all of the SEA Objectives apart from Objective 3 (soil). [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]

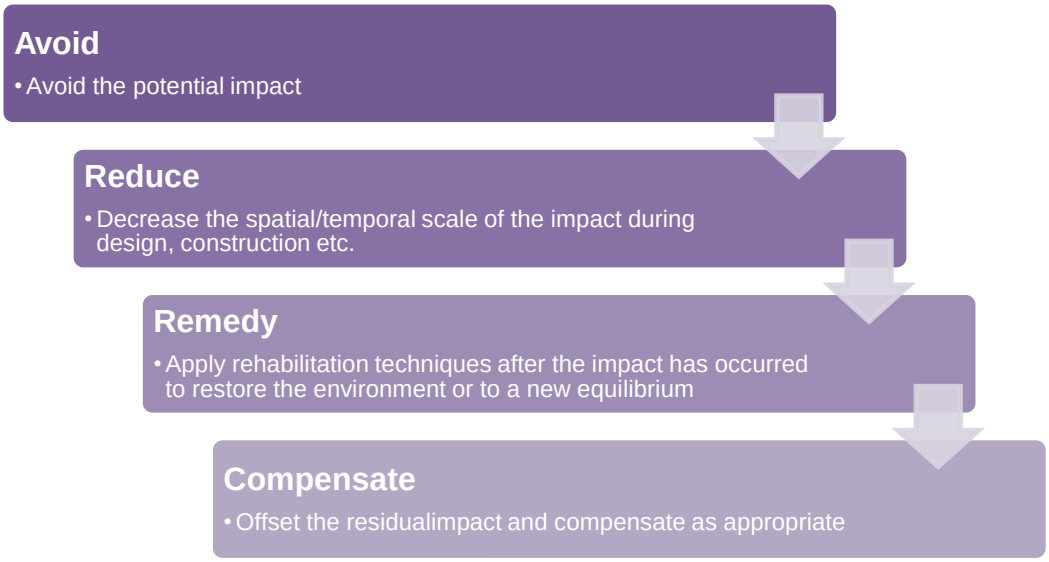
Cumulative Assessment: Alternative

SEA Objective	Timescale		
	Short Term	Medium Term	Long Term
1	+	-	**-**
2	+	+	**+**
3	+	+	**+**
4	=	=	**=**
5	+	+	**+**
6	+/-	+/-	**+/-**
7	+	-	**-**
8	**+**	**-**	**-**

Commentary: Overall it is anticipated that by continuing to rely on the interim Supplementary Guidance, there would be positive environmental effects for the environment against SEA Objectives 1, 2, 3, 5, 7 and 8, in the short term. However as the spatial framework used in it is now out of date, not aligning with SPP, 2014, once HwLDP2 is adopted with the 2014 SPP spatial framework, the interim SG would be superseded. The Council would then be left in a position where there would be no Supplementary Guidance to support the HwLDP2 policy. This could potentially lead to negative environmental effects in the medium to long term.

Mitigation Measures

An important feature of the Strategic Environmental Assessment is to assess any environmental impacts from development and identify relevant mitigation. Schedule 3 paragraph 7 of the Environmental Assessment (Scotland) Act 2005 requires an explanation of "the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme." Our approach to mitigation is based on the following recognised hierarchy:



In the first instance the guidance seeks to **avoid** significant adverse effects on the environment. This represents the cheapest and most effective form of impact mitigation. It has mainly been achieved through either not preferring particular uses on a site or not preferring the site as a development opportunity. Where this is has not been achieved, the provision of the Plan seeks to **reduce** the severity of impact, identify ways to **remedy** or restore the environment, as the last resort, **compensate** for the adverse effect so there is no net loss. An additional approach has been to identify potential mitigation which will **enhance** the environment and achieve a net positive gain.

During the evolution of the Draft SG from earlier versions, including those from April 2011 and March 2012, a range of mitigation was identified through the SEA process, including in the form of comments and suggestions from consultation authorities and other stakeholders. These suggestions were taken on board and incorporated into the Draft SG. For information on how previous versions were modified as a result of mitigation identified through the SEA process, please see Table 7 of the Environmental Report accompanying the Onshore Wind Energy Interim Supplementary Guidance.

By undertaking a detailed assessment for each of the sections of the Draft SG, in some cases we identified further mitigation measures in the Revised ER. These mitigation measures (summarised in the table below) have been taken into account when preparing the final SG. With regard to these and to changes made to the SG between Draft and Final versions, the following may be noted:

- The review of the HwLDP is ongoing and, whilst the timetable for the review has been lengthened to enable progression of other Local Development Plan work (see Development Plans Scheme 2016 – September update) it will be progressed, enabling us to ensure that HwLDP2 policies continue to cover all the SEA topics and in the meantime the spatial

framework has been included in the final SG and the HwLDP (2012) provides relevant and adopted general policies;

- As noted below, the finalised SG includes amendments to improve its environmental performance in respect of soils;
- The finalised SG includes amendments to the Loch Ness area study in response to comments received and to reflect amendments to the methodology for that work, which is also now more fully explained; draft outputs for other study areas will be subject of public consultation before they are finalised (noting that in the meantime the SG is being adopted as it currently stands, without those other studies);
- The Council has ensured that the finalised SG for adoption is up-to-date with respect to procedures.

SUMMARY OF FURTHER MITIGATION IDENTIFIED		
Section of Draft SG	**Further mitigation identified**	**Relevant SEA Objectives**
Key Development Plan Considerations	Ensure HwLDP2 policies continue to cover all these topics [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]	All
Highland Strategic Capacity	Further consultation on study areas output.	All
Advice for Small-scale Developments	Ensure any updates to procedure are included in future version of the SG	All
Further Technical Information	Ensure any updates to procedure are included in future version of the SG	All
Cumulative Assessment	Ensure HwLDP2 policies continue to cover all these topics [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]	All

Strategic Environmental Assessment and Habitats Regulations Appraisal

When undertaking this Strategic Environmental Assessment, The Council has been conscious of the overlap in work between the Strategic Environmental Assessment and the Habitats Regulations Appraisal work which is required to be undertaken. With this in mind SEA objective 1 was identified as being able to be used to inform an initial screening to help identify which elements of the guidance may have an effect on a European designated site either alone or in-combination.

A Habitats Regulations Appraisal Record has been produced through partnership working with relevant agencies, in this case Scottish Natural Heritage. It has been signed off by SNH and will be published prior to the adoption of the On-shore Wind Energy: Supplementary Guidance as a statutory part of the Development Plan.

Monitoring

Section 19 of the Environmental Assessment (Scotland) Act 2005 requires the Responsible Authority to monitor significant environmental effects of the implementation of the SG. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action.

It is considered good practice that monitoring is based on a pre-defined purpose, helping to solve problems, and address key issues. Monitoring should include practical measures customised to the PPS, the findings of which should be transparent and readily accessible to the public. Monitoring is also seen as a reflexive learning process relating closely to the collation of environmental baseline information.

For this monitoring to be effective it will need to be linked to both the SEA Objectives and the objectives of the Supplementary Guidance. The baseline data set out earlier in this report sets the scene for any monitoring which is to take place.

The two tables below set out the relevant monitoring framework.

Monitoring Exercise	Monitoring Report	Responsible for Data Collection and Analysis
The Highland Council will undertake a trial monitoring exercise involving a sample of wind energy proposals which will be looked at in some detail with regard to the planning issues raised and how they have been assessed and considered in the context of application of the Supplementary Guidance. The sample of proposals will include a range of types, sizes and locations. This will be a focussed quantitative and qualitative assessment.	The trial will feed in to an initial report to be prepared by the Council, scheduled for August 2017, reflecting on how effective the Supplementary Guidance had been. The Council will then reflect on the value and effectiveness of the trial method as a means of monitoring and consider whether to continue, amend or replace it and whether to continue or amend the sample size or include all proposals going forward, having regard to resource issues.	THC. The SEA Consultation Authorities may be asked to provide advice to assist the exercise.

Environmental Parameter and SEA Objective	Monitoring Indicator	Remedial Action
1 - Biodiversity, Flora & Fauna To conserve and where possible enhance biodiversity and accord to the protection of valued nature conservation habitats and species.	The trial described above will aim to include the following, with reference to the environmental parameters and SEA Objectives: • Use of the SG in pre-application advice. • Use of the SG in assessment of planning	Remedial Action with respect to any particular parameter may include, where appropriate: • Review application of SG in pre-application, application and post-decision phases. • Seek additional or alternative (more
2 - Population & Human Health To improve the living environment for all communities and promote improved health of the human population.		

3 - Soil & Peat Safeguard the soil quality, geo-diversity and improve contaminated land.	applications. • Progress with totals for consented onshore wind energy generation and for the amount deployed. • The number of applications that have been granted permission where there are significant effects on the environment. • Delivery and effectiveness (performance) of plans for the mitigation of significant effects on the environment, with a particular focus on features formally identified for safeguarding (e.g. statutorily designated). • Loss of resource and compensatory provision. • Compliance with spatial framework. • Emergent pattern of decisions and degree of fit with guidance e.g. with guidance for the Loch Ness study area.	effective) mitigation measures. • Seek review of national policy. • Consider review of local policy/ guidance. • Draw up and implement a strategy and action plan for increasing effectiveness of mitigation, which may include coordination and delivery of mitigation between schemes in an area.
4 - Water Avoid, manage and reduce flood risk and protect the water environment.		
5 – Air Maintain and, where possible, improve air quality.		
6 - Climatic Factors Reduce greenhouse gases and contribute to the adaptation of the area to climate change.		
7 - Material Assets Manage, maintain and promote sustainable use of material assets.		
8 - Historic Environment & Cultural Heritage Protect and where appropriate enhance the historic environment.		
9 – Landscape Protect and enhance the character, diversity and unique qualities of the landscape.		

Additional monitoring of specific aspects of onshore wind energy development, as they relate to the Environmental Parameters in the table above, may also be investigated further and used to inform future reviews of the SG.

Next Steps

This is the Finalised Environmental Report which will be adopted alongside the Onshore Wind Energy: Supplementary Guidance. This document will not be subject to consultation.

As soon as practically possible after the adoption of the Onshore Wind Energy: Supplementary Guidance, The Highland Council will prepare a Post Adoption Strategic Environmental Statement setting out:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how the opinions expressed during consultation periods have been taken into account;
- how the results of transboundary consultation have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives considered; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Appendix 1– THC Response to Comments on Environmental Report (2012)

Historic Scotland

Comment	Already taken account of in Onshore Wind Energy Consultation Paper (2015)?	THC Response
Welcome that the comments we provided on the Scoping Report on 23 August 2011 have been generally taken into account during the preparation of the Environmental Report. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the SPG.	N/A	Noted.
The Environmental Report provides a clear account of the steps undertaken during the environmental assessment process and presents these in a logical structure. In general I am content to agree with the findings of the assessment and in particular welcome the manner in which revisions to the guidance as a result of the strategic environmental assessment process have been reported. In terms of the proposed monitoring framework I note that this is yet to be confirmed in relation to the historic environment. Monitoring is a useful tool in gauging the success of any strategy and any unforeseen effects. The performance of this guidance could be measured against such information as the number of applications that have ben granted permission where there are significant effects on the historic environment. However, the post-adoption statement for this guidance should set out how the monitoring is intended to be carried out.	N/A	Noted.

SEPA

Comment	Already taken account of in Onshore Wind Energy Consultation Paper (2015)?	THC Response
We are generally satisfied with the content of ER.	N/A	Noted.
Measures recommended through ER We have reviewed the submitted ER and in terms of our interests welcome the measures detailed on Pages 74 to 78 of the ER which have been incorporated into the SG to offset significant environmental effects in terms of the water environment and peatlands. It is good to see the measures that have been incorporated clearly set out in this format as it helps to demonstrate how the SEA has informed the SG. We note that SEA Objective 4 is scored as = in terms of the development guidelines. We consider	The Consultation Paper includes peat and soils within Section 4 - Larger Scale Wind Energy Proposals – it is not part of the policy guidance.	Noted. This approach from the Interim SG has been carried forward into the Draft SG.

that the SG could be improved as detailed in Section 3 below in order to improve the effects of the SG on this objective.		
In addition we notice that Sections 2.8 and 2.14 of the March 2012 SG imply that developers do not need to have regard for the Additional Guidance section of the SG. It is unclear what weight is to be given to the Additional Guidance section and therefore we are unclear about the + scoring under SEA Objective 4 regarding peat for the Additional Guidance. We have made a number of recommendations in terms of peat issues on the SG itself which could have positive implications for the SEA process if incorporated into another iteration of the SG.	The 2015 Consultation Paper contains section 4 Larger Scale Wind Energy Proposals – this includes peat and in particular the SNH CPP mapping as a consideration for larger scale development.	The SEA assessment was based on the 2011 version of the draft Supplementary Guidance, hence why peat was scored +ve as Additional Guidance was part of that draft SG.
SEA Monitoring We welcome the proposed monitoring set out in Table 7 on Page 79 of the ER. We are unclear of the links between some of the indicators and windfarm development so have made a number of suggestions for alternate monitoring which may more directly reflect affects of the SG. On many of the issues relating to this SG is may be hard to collect meaningful quantitative data and instead it may be that sampling of qualitative data would give you a more meaningful picture of the effects of the SG. Through collecting this information it could help inform any future iterations of the SG.	N/A	The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
In terms of water quality whilst we appreciate that bathing water monitoring is already carried out so it would not represent an additional monitoring burden, we do not consider this would have a direct link to environmental effects relating to windfarm developments. The bathing water quality monitoring carried out is in terms of faecal matter as opposed to silt, peat or oil pollution from wind farm developments. We do keep records of the number of pollution incident complaints we receive generally and it may be that this information could form a more relevant data set in terms of the SG. For example perhaps taking a sample of 10 or wind farm developments across Highland and seeing whether SEPA received any substantiated pollution complaints may be a proportionate way of monitoring this or least this would give an flavour of the types of problems which developers are struggling to address and whereby further guidance may help.	N/A	Noted. The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
Our waterbody classification work does monitor water quality generally and we note that you have included this as an indicator. This is a very general indicator which would be unlikely to pick up the short term pollution caused by soil, oil or peat pollution and	N/A	Noted. The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.

therefore the above pollution incident sampling may give a more accurate picture in terms of the SG itself. In terms of the monitoring indicator the “C” classification is no longer in use so this should be revised to whether a waterbody is classified as moderate, poor or bad ecological potential and any changes within that each year. This data is available from SEPA.		
Another key issue for us in terms of windfarms is the impacts upon water body morphology. In terms of wind farms this would often relate to the number of new watercourse crossings, proximity to water bodies or impacts upon wetlands. It would be onerous to monitor these for every wind farm in Highland but again perhaps taking a sample of wind farm planning application responses from us across the 5 size categories of windfarms and assessing how often we objected on these grounds would highlight whether this was an issue developers were not addressing in their planning submissions and thus not adhering to the SG. By doing this across each size category you may get a picture of which issues are particular to different scales of development or whether some key issues related to all development and therefore whether certain criteria should apply to all scales of wind farms.	N/A	Noted. The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
We would recommend this type of monitoring would also be a good way of capturing how developers are addressing peat management issues. This could form part of the monitoring for impacts upon material assets or climatic factors. Both SEPA’s and SNH responses would touch on these issues from different aspects and again highlight policy gaps or where developers were not adhering to policies. For example we will often advise on how the layout of a site can be redesigned to avoid the disturbance of peat or comment on the legitimate re-use of peat for peatland restoration works.	N/A	Noted. The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
By carrying out focussed meaningful qualitative monitoring you may be able gain a picture on a number of policy issues. This type of monitoring could usefully involve the Consultation Authorities but perhaps more importantly development management teams who are implementing the policies. We would welcome any feedback you have on the above monitoring suggestions in terms of practicalities or meaningfulness as we recognise that monitoring is a currently an evolving area of SEA.	N/A	Noted.

SNH

Comment	Already taken account of in Onshore Wind Energy Consultation Paper (2015)?	THC Response
We have identified five details emerging from this SEA exercise which you may wish to consider as mitigation measures that could be taken across to a revised version of this (March 2012) guidance – 1. Add a cross reference in paragraph 2.91 to the Council's 'Construction Environmental Management Process for Large Projects' guidance (which was cross-referenced in the April 2011 version but not in the March 2012 version) 2. Add a cross-reference in paragraph 2.18 to SNH's 'Assessing Connectivity with Special Protection Areas' guidance. 3. Add a note to the map of Stage 3 Areas of Search to indicate that they do not imply a presumption in favour of planning approval; and that constraints may exist as set out in the Development Guidelines, Additional Guidance and Development Plan Policies. 4. Add a comment in paragraph 2.11 that constructed and approved windfarms will be monitored with a view to potentially identifying Stage 1 areas where cumulative impact limits further development 5. Amend paragraphs 2.8, 2.12 and 2.14 to refer to the Additional Guidance as well as the Development Guidelines sections of the guidance, in order that this material (e.g. peat) is accorded sufficient weight.	1. There is no cross-reference to the Council's 'Construction Environmental Management Process for Large Projects' guidance in the Consultation Paper. 2. There is no cross-reference to SNH's 'Assessing Connectivity with Special Protection Areas' guidance in the Consultation Paper. 3. The Spatial Framework has now changed however under the new approach, Group 3 – Areas with potential for wind farm development – say proposals are likely to be supported subject to detailed consideration against HwLDP in particular policies 57 and 67 and other sections of this interim guidance. 4. Cumulative impact remains a planning consideration and, national policy and advice indicates, that it can be taken into account when identifying strategic capacity and areas of greatest potential for wind energy development, but national policy does not allow us to identify it within the spatial framework. There is also an interactive map on the Council's website of wind turbine development which shows the location of each turbine consented. 5. In the Consultation Paper all sections carry equal levels of importance/weight.	Noted. Relevant guidance is now cited in the Draft SG.
We note that as part of this Environmental Report the proposed Appendix on Small Scale Wind Turbine Proposals has been screened out of SEA. This document is viewed by the Council as purely comprising advice on planning process and information requirements to accompany planning applications. We feel however the section on Siting and Design goes further than this,	The Small Scale Wind Turbine SG is now being amalgamated with the interim onshore wind energy SG so it will be subject to SEA.	Noted. Actioned in the revised ER.

but we have provided separate comments on this document with regard to guidance we believe should be added for biodiversity, flora and fauna.		
These comments do not reflect the ongoing discussions we are having with your colleagues on how both wildness and cumulative impact might be incorporated into the Stages 1-3 mapping of the Spatial Framework. Once these discussions have concluded there may be a need to revise the Supplementary Guidance further.	Work on wild land areas and cumulative impacts have progressed and are incorporated into the Consultation Paper.	Noted. Actioned in the revised ER.
Non Technical Summary Page 5 under biodiversity – in the table RAMSAR should be lower case. Maybe the percentage area covered by designated areas could be added to the table.	N/A	Noted.
Page 6 under climate change – could perhaps be some information on the current extent of wind farms in Highland.	The background section of the Consultation Paper provides some information on the current extent of turbines of hub height over 50m.	Noted, however current information on renewables in Highland are not included as they will become rapidly out dated. Alternatively reference is now made to the Council's interactive wind map that will continue to provide an up to date picture of onshore wind energy development.
Page 7 under landscape – perhaps the percentage area covered by designated areas could be added to the table. For Wild Areas the availability of the map of Relative Wildness could be mentioned.	Wild Land Areas mapping is referred to in Consultation Paper.	Noted.
Page 8 Assessing the options – we recommend it should be made clearer that this assessment is of the April 2011 version and not of the March 2012 version. In particular the Spatial Framework and Appendix 1 (Landscape and Visual) significantly differ between these versions.	N/A	Noted.
In places the NTS refers to the main body of the ER for more details, whereas it would be preferable if the NTS could be read by someone as a stand alone document.	N/A	Noted. Actioned in the revised ER.
Page 11 Key Facts The title of the guidance should make clearer that it is the April 2011 Consultation Draft version that is the subject of this SEA. This is because it is stated below that it was prepared with reference to the 2008 version of PAN 45 Annex 2 rather than the 2011 version of PAN 45 Annex 2.	N/A	Noted.
We recommend the intention to add as an appendix the more recent draft guidance on Small Scale Wind Turbine Proposals should be discussed here.	The Interim Small Scale Wind Turbine Proposals SG is now going to be within the Draft Inshore Wind Energy SG, rather than a	Noted.

	separate document.	
Page 13 SEA activities to date Perhaps this table could be expanded by showing alongside the stages of development of the guidance itself.	N/A	Noted. The revised ER outlines activities to date.
Pages 14-15 Relationship with other PPS 24 EC Birds Directive – You may wish to note that as a result of The Conservation (Natural Habitats, &c.) Amendment (Scotland) Regulations 2012 (which came into force in August 2012), local authorities must take such steps in the exercise of their functions as they consider appropriate to contribute to the achievement of the objective of the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in Scotland. In considering which measures may be appropriate for the purpose of securing or contributing to this objective, regard may be had to economic and recreational requirements. In addition, so far as lies within its powers, a competent authority must use all reasonable endeavours to avoid pollution or deterioration of habitats of wild birds in Scotland.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
31 Wildlife and Countryside Act 1981 – This is relevant for protected species as well as SSSIs in terms of onshore wind energy, especially birds.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
83 Interim Guidance on European Protected Species – This refers to HRA, but any impact on EPS is not an issue for HRA. Any impact on bats for example should be mitigated through the SEA rather than the HRA.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
92 Assessing Impacts on Wild Land - We recommend that entry no's 249 (Wildness Quality Map) and 250 (Wildness in Scotland's Countryside) later under 'Regional' are moved up to appear here under 'Scotland National'.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
89-96 Relevant SNH Guidance — other SNH guidance regarding onshore wind energy that should be added are **1.** Assessing Connectivity with Special Protection Areas (2012) **2.** Siting and Design of Small Scale Wind Turbines of between 15 and 50 metres in height (2012) **3.** Assessing the impact of small scale wind energy proposals on the natural heritage (2012) **4.** Visual Representation of Wind Farms (under	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.

review) (2006) **5.** Visual Assessment of Wind Farms Best Practice (2002) **6.** See our website at - http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/		
A cross-reference can be added to our 'Connectivity' guidance in para 2.18 of the Interim Supplementary Guidance upon any future update.	There is no cross-reference to SNH's 'Assessing Connectivity with Special Protection Areas' guidance in the Consultation Paper.	Noted. This guidance is now referred to in the Draft SG.
98 Cumulative Effects of Wind Farms (2005) - This SNH guidance has been updated — (2012) — 'Assessing the Cumulative Impact of Onshore Wind Energy Developments'	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities. Relevant SNH guidance has been added.
165 Good Practice During Wind Farm Construction and 166 Calculating carbon savings from wind farms on Scottish peatlands — A New Approach — These would be more appropriately listed under Scotland National than Scottish National Planning Policy.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
245 Guidance Note on Construction Environmental Management Process for Large Scale Projects - This very relevant piece of guidance does not appear to be cross-referenced within the later March 2012 version of the Supplementary Guidance, although a cross-reference was included in Appendix 2 of the April 2011 version. It would for example appear still to be relevant to the 'Additional Guidance' under para 2.91 ('Mitigation'). We recommend this is picked up in any future revision of the SG subsequent to this consultation by adding a cross-reference in para 2.91.	There is no cross-reference to the Council's 'Construction Environmental Management Process for Large Projects' guidance in the Consultation Paper.	Noted. This guidance is now referred to in the Draft SG.
248 Special Qualities of NSAs - This entry under 'Regional' duplicates an earlier entry (no 91) under 'Scotland National'	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
249 and 250 — see comments above under 92.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
pp44-51 - Relevant aspects of the current state of the	N/A	This section of the Revised ER has

environment Species - This list from UKBAP might usefully focus on those species more likely to be affected by wind energy developments, and their current state in Highland — e.g: birds, bats, otter, water vole, wildcat.		been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
Climate change - The present extent of wind farms in Highland could be added here as a baseline feature of the current state of the environment; this would help lead to a consideration of the current cumulative state.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
Landscape - We recommend the commentary on wild areas is augmented with reference to an additional map in Appendix 1 of the quality of wildness in Highland drawn from the map on the SNH website, to indicate the importance of Highland for this resource: http://www.snh.gov.uk/protecting-scotlands-nature/looking-after- landscapes/landscape-policy-and-guidance/wild-land/mapping/	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
Assessment of environmental effects pp55-56 — scoping of the Spatial Framework — this omits an entry for Stage 4, which was a part of the April 2011 version (although not a part of the March 2012 version). p59 — scoping of Appendices — this includes 'Appendix 6 ¬ Small Scale Wind Turbine Proposals' which didn't feature in the April 2011 version but which is presumably intended as an appendix to the guidance following the current consultation on a draft document. We note here that the whole of this guidance is screened out on the basis that it purely gives advice on planning process and information requirements. However there is a section on siting and design, which we feel goes further than this. Therefore we have commented in the separate consultation on additional guidance (e.g. with regard to biodiversity, flora and fauna) which could be included here.	The Small Scale Wind Turbine SG is now being amalgamated with the interim onshore wind energy SG so it will be subject to SEA.	Noted. The Draft SG has been revised to reflect SPP so the spatial framework referred to in this comment has been superseded.
pp 63-64 and Appendix 3 pp125-1 32 - Assessment of Spatial Framework We would query the '+' score given for biodiversity, flora and fauna (Objective 1). The Spatial Framework may include within the Broad Areas of Search locations that are sensitive for 'wider countryside' habitats and species, and may also include locations with connectivity to SPAs. Therefore while agreeing the Spatial Framework protects designated areas and important woodland, given it does not allow for these other potential interests, we feel a	N/A	The Revised ER includes revised assessments.

'+/?' score would be more appropriate.		
We would similarly query the '+' score given for reducing impact on peatland (Objective 4). While inclusion of SSSIs and SACs as part of the Spatial Framework will protect peatland in these designated areas, other areas of deep peat not in designated areas may be included in the Broad Areas of Search. Therefore again we feel a '+/?' score would be more appropriate.	N/A	The Revised ER includes revised assessments.
In terms of landscape (Objective 10), the '+' (or even '++' in one case) scoring is based on the approach envisaged in the April 2011 version of the guidance, where detailed landscape and visual (including cumulative analysis) work had been commenced for two pilot areas and would be rolled out for other areas, to spatially inform the Spatial Framework. However this is tempered to a degree by the present lack of inclusion of wild land in the sieve mapping (such as SNH's Search Areas for Wild Land). So given some of the Broad Areas of Search indicated may include areas with wildness qualities, it is suggested a '+/?' score would reflect this important landscape component for wind energy. (We pick up below the fact that in any case this pilot landscape and visual work was omitted from the later March 2012 interim-approved guidance, so presumably reducing the positive effects for this objective).	N/A	The Revised ER includes revised assessments.
Possible mitigation in any future update — subject to other further more detailed analysis - could be the addition of a caveat to the map of Areas of Search, although we appreciate a caveat is in the text of the March 2012 version. For example the following caveat appears on the map of search areas within the Moray Draft Wind Energy Guidance (July 2012) — "Preferred search areas are areas with the greatest scope for further investigating the feasibility of developing a wind farm. Preferred search area status does not imply a presumption in favour of granting planning consent within these areas. When assessing planning proposals, regard will be had to the Development Plan policies, spatial frameworks, development guidelines, additional guidance and the Moray Wind Turbine Landscape Capacity Study".	The Spatial Framework has now changed however under the new approach, Group 3 – Areas with potential for wind farm development – say proposals are likely to be supported subject to detailed consideration against HwLDP in particular policies 57 and 67 and other sections of this interim guidance.	Noted.
In terms of alternatives, given that landscape and visual capacity	The spatial framework is now superseded.	Noted.

work (including cumulative limits) does not feature in the revised March 2012 version of the guidance, it would have been helpful if this later version of the Spatial Framework had been assessed as an 'alternative' to the April 2011 version, so that such differences could be assessed and noted.		
With regard to the alternative assessed which we take to be no Spatial Framework at all being mapped, with reliance instead on the policies in the Highland wide LDP, for clarity it would have been helpful to explain whether this is in addition to the rest of the Guidance (i.e. the Development Guidelines and Additional Guidance), which seems logical.	The spatial framework is now superseded.	Noted.
Another possible alternative leading on from the comments above re species (especially birds), peat and wild land would have been an alternative based on greater mapping of such sensitivities as part of the Spatial Framework. However we accept that this is complicated by the change from a 4-stage methodology to a 3-stage methodology between the April 2011 and March 2012 versions of the Guidance.	The spatial framework is now superseded.	Noted.
pp65-66 and Appendix 3 pp1 33-140 - Assessment of Development Guidelines Please see above comments re the alternative — to distinguish between the two, we suggest it could have been made clearer that this alternative is reliance only on policies in HwLDP, while the above alternative is reliance on policies in HwLDP plus these Development Guidelines.	N/A	Noted.
With regard to the Alternative, for peat (Objective 4), the `-` score is unclear given that Policy 55 of HwLDP relates to peat and that peat is not an issue included in the first place in the Development Guidelines. A `=' score (as for other issues) seems more appropriate.	N/A	The Revised ER includes revised assessments.
pp67-68 and Appendix 3 pp141-146 — Assessment of Additional Guidance The weight that may be attached to the Additional Guidance (and hence the ability to assign `+' scores here) has changed from the April 2011 to the March 2012 version. The April 2011 version refers to regard being had to the additional guidance in para 4.2. However this is omitted from the March 2012 version, e.g. paras 2.8, 2.12 and 2.14. We strongly recommend a future revision of the guidance should rectify this, given for example important material relating to peat (SEA Objective 4) in the Additional Guidance.	N/A	The Revised ER includes revised assessments.

pp68-69 and Appendix 3 pp147-148 - Assessment of Appendix 1 Landscape and Visual This assessment is for Appendix 1 of the April 2011 version which does not feature in the March 2012 interim-approved version. While it scores very positively in landscape terms, it is unable to be compared with the alternative in reality of the March 2012 interim-approved guidance, which omitted Appendix 1. An alternative of not having Appendix 1 but relying instead on the rest of the Guidance plus HwLDP policies would have seemed appropriate to assess for comparison. This would have been unlikely to have scored so well, given the absence of detailed spatial information on landscape capacity, cumulative limit, wildness, visual sensitivities.	N/A	Noted.
The alternative to Appendix 1 actually considered is however unclear. It is quoted in Appendix 3 as being reliance on HwLDP policies, but on p59 it is quoted as being landscape and visual assessment for the whole of Highland, rather than the two pilot areas. The scoring (even more positive for landscape) implies the latter. However as noted above, it would have been helpful if this alternative was accompanied by the opposite alternative (as evidenced by the March 2012 version) of no detailed landscape and visual assessment at all as part of the Spatial Framework.	N/A	Noted.
pp70-72 and Appendix 4 pp149-169 - Assessment of cumulative effects With reference to Objective 2 (people coming into contact with and appreciating natural environments), the cumulative `+' score seems at odds with the component scores of `=', `+' and `='. An overall `=' score may be more appropriate.	N/A	The Revised ER includes revised assessments.
The alternative assessed is unclear. It is quoted in Appendix 4 as being reliance on HwLDP policies, but on p71 as being the Spatial Framework from the March 2012 Interim-approved Guidance plus consideration of some suggestions made to the Council after consultation on the April 2011 version but with no additional guidance, and no Development Guidelines. This seems very unclear, and in any case the scoring given would appear to tally with the individual scores for components of the April 2011 version (based on the alternative assessed individually of reliance on HwLDP).	N/A	The Revised ER includes revised assessments.
A further consideration under cumulative effects could have been the cumulative effect of wind farms in the Broad Areas of Search in the Spatial Framework. Mitigation could then have been considered	N/A	The Revised ER includes revised assessments.

to the general effect of reviewing future development of wind farms in the Broad Areas of Search with a view if necessary to identifying Stage 1 areas in the Spatial Framework where the cumulative impact of wind farms limits further development. If the Interim-Approved Guidance is amended following this consultation, such a sentence could be added to para 2.11.		
p73 — Assessment of alternatives compatibility with other PPS The purpose of this section is unclear. It consider three other PPS in particular (S0A2, HwLDP and HRES) but this has already been covered by the earlier section on the relationship with other PPS (pp16-4 3). It is suggested these sections are brought together.	N/A	Noted.
pp74-77 - Mitigation measures This lists the revisions made to the April 2011 version when producing the March 2012 version. As such it includes measures that arose from the consultation on the April 2011 version as well as measures that arose out of the SEA process. Perhaps those changes made to the April 2011 version that did not arise from the SEA should have been assessed for their environmental effects (positive and negative), and mitigation identified if necessary.	N/A	Noted. The revised ER has an updated mitigation section.
pp78-80 – Monitoring Biodiversity - Wind turbines affecting designated areas —not just within them — should be monitored. We do not have annual monitoring reports on disturbance to protected species. Future relevant data may be applicable from applications to SNH for species licenses. Displacement and collision risk data per protected bird species could be collated	N/A	The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
Landscape – The impact of wind turbines on areas of Highland with strong qualities of wildness should be monitored. Wind turbines affecting NSAs (i.e not just within them) should be monitored. We recommend there should be monitoring with a view to identifying cumulative impacts from other sensitive receptors as well as settlements.	N/A	The monitoring data has been updated for the revised ER and is based on a more pragmatic and realistic monitoring approach.
pp82-120 - Appendix 1 — Baseline Information and Maps Material Assets - p91 — It is unclear why the map of Tourist and	N/A	A map is provided in the Revised ER which shows: Core Paths, Long

Recreation Routes does not include the roads to Skye, Ullapool, Gairloch or Mallaig		Distance Routes and National Cycle Network.
Soil and waste - The Council may be able to obtain further spatial data from the Scottish Government — access to the Scottish Government data should be requested directly to SG. An end-user license for access to soil data covered by the SG/JHI licensing agreement may be granted by SG strictly for non commercial to Scottish institutions. Digital dataset available include: · Land Capability for Agriculture maps 1:250,000 · Land Capability for Agriculture map 1:50,000 · Soil of Scotland 1:250,000 · Soil of Scotland 1:25,000 · Recorded peat depth The person responsible for SG soil data licensing is Phil Balls, Head of Science and Knowledge Management in RESAS: philip.balls@scotland.gsi.gov.uk Geodiversity should be considered under this section. Baseline data should include distribution of GCR and Local Geodiversity Sites.	N/A	Baseline data has been updated.
Landscape - pp108-109 - Data re peatlands, forest/woodlands, agricultural land, croft land and coast does not seem to fit here — we recommend these are moved to more relevant sections of baseline information. The Reports on the Special Qualities of NSAs are not included here - http://www.snh.gov.uk/protecting-scotlands-nature/protected areas/national-designations/nsa/special-qualities/ Spatial data on relative wildness should be included here pending more detailed mapping — http://www.snh.gov.uk/protecting-scotlands-nature/looking-after landscapes/landscape-policy-and-guidance/wild-land/mapping/	N/A	Baseline data has been updated.
Biodiversity, flora and fauna - Details of designated sites (including site condition) can be found on our website under SNHi/SiteLink — http://www.snh.gov.uk/publications-data-and-research/snhi information-service/sitelink/ Details of species can be found via the NBN Gateway ¬ http://www.nbn.org.uk/	N/A	Baseline data has been updated.

Details from the Ancient Woodland Inventory could be added here, e.g. Category 1a, 1b, 2a, 2b and 3 woodland p118 — the map of Special Protection Areas is incomplete; the following SPAs should be added — · Foinaven · Glen Affric to Strathconon · Moidart and Ardgour · Glen Etive and Glen Fyne · Cairngorms Massif		

Douglas S Brodie

Comment	**Already taken account of in Onshore Wind Energy Consultation Paper (2015)?**	**THC Response**
The Environmental Report refers to the Aarhus Convention in section 9 of Table 2. The stated requirements are: "Acknowledges the need for public participation in environmental issues and grants the public rights to access to justice and information on the environment." I don't think this is strong enough as it makes no mention of the need for transparency, accountability and responsiveness. You are no doubt aware that UNECE has recently ruled (late August 2012, see press release), that the EU has failed to comply with the Aarhus Convention in relation to the renewable energy programme. I understand that this means the entire renewable energy programme is illegal, as the Aarhus Convention is an integral part of EU law. This applies to all 27 Member States. I trust you will re-consider your guidance to take account of this. The recent behaviour of the Scottish Government in overruling wind farm proposals rejected by local councils is surely a further breach of the Convention.	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.
The Environmental Report refers to Scotland and UK Energy Policy in section 35 of Table 2 with the stated requirement: "… to reduce carbon emissions, and so tackle climate change" With regard to the first clause of this requirement, i.e. "… to reduce carbon emissions", I submit that the guidance should give calculations for wind energy net CO2 emission reductions, taking	N/A	This section of the Revised ER has been updated to reflect the more recent approach that THC has agreed with the Consultations Authorities.

account of: • construction and installation of the wind turbines; • powering the rotors during predicted very low wind periods; • de-frosting during predicted freezing conditions; • the CO2 emissions generated by the reserve plant needed when the wind is too low or too high, spinning in stand-by or operating in a variable mode rather than on a steady power output and hence less efficient and burning more fuel.		
With regard to the second clause of the previous comment, i.e. "and so tackle climate change", I note that the very first sentence of the 27-page Interim Supplementary Guidance document refers to "combating climate change", yet "climate change" is not mentioned again in the rest of the document. This indicates to me that "combating climate change" is just a platitude. I submit that the guidance should quantify the predicted amelioration of climate change that the wind energy development will achieve. By this I don't mean what weight of emissions would be saved. I want an explanation of how, and by how much, it would actually combat (or "tackle") climate change.	N/A	The purpose of the draft SG is to set out how the Council will manage onshore wind energy development in the Highlands as set out in Scottish Planning Policy. It is not a document on climate change.
The Environmental Report refers to Scotland and UK Energy Policy in section 35 of Table 2 with the further stated requirement: "… to deliver energy at an affordable price for both individuals and businesses" The Scottish Government calculates that in 2010, currently the last year for which full figures are available, almost 36% of Scottish households were living in fuel poverty. However adding "free" wind power to the energy system only seems to be making things worse. I submit that the guidance should give calculations for the wind energy impact on the cost to the consumer, taking account of: • the feed-in tariffs for the predicted range of output power; • the consumer price "double whammy" created by heavy reliance of wind power (see Poyry Report on Wind Intermittency), i.e. because wind power has priority over thermal power, when the wind blows the high wind power feed-in tariff has to be paid and when the wind doesn't blow, the reserve thermal plant spot price is higher than it	N/A	The purpose of the draft SG is to set out how the Council will manage onshore wind energy development in the Highlands as set out in Scottish Planning Policy.

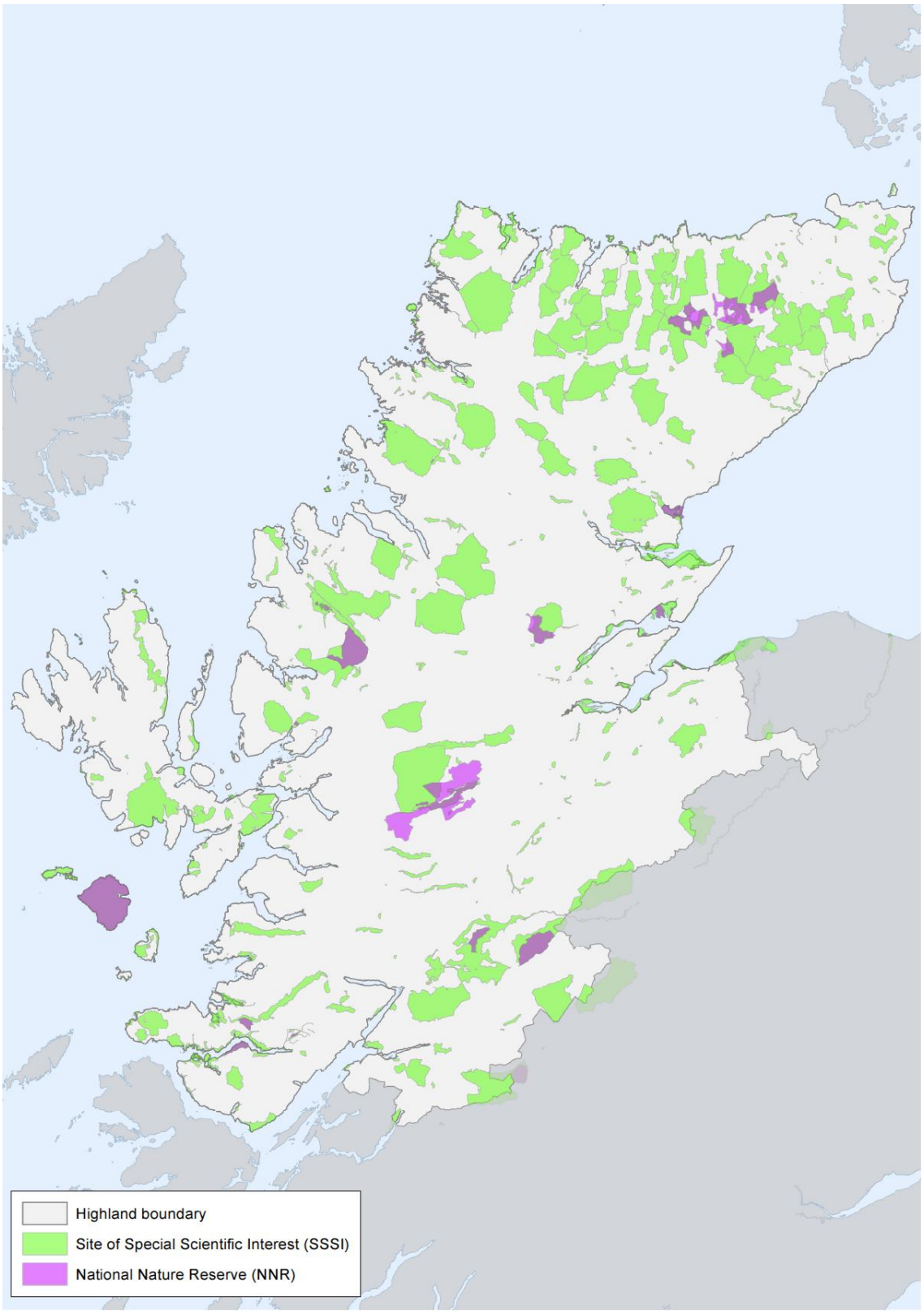
would otherwise have been without all the wind turbines; • the relatively high operating and maintenance costs and the relatively short operating lives of wind turbines; • the cost share of building and running the reserve plant needed to provide electricity when, worst case, the entire country has feeble wind for several days on end (which tends to happen in winter when demand is at its highest); • the cost share of upgrading the grid to handle the extra wind capacity.		

Appendix 2 – Baseline Data Information and Maps

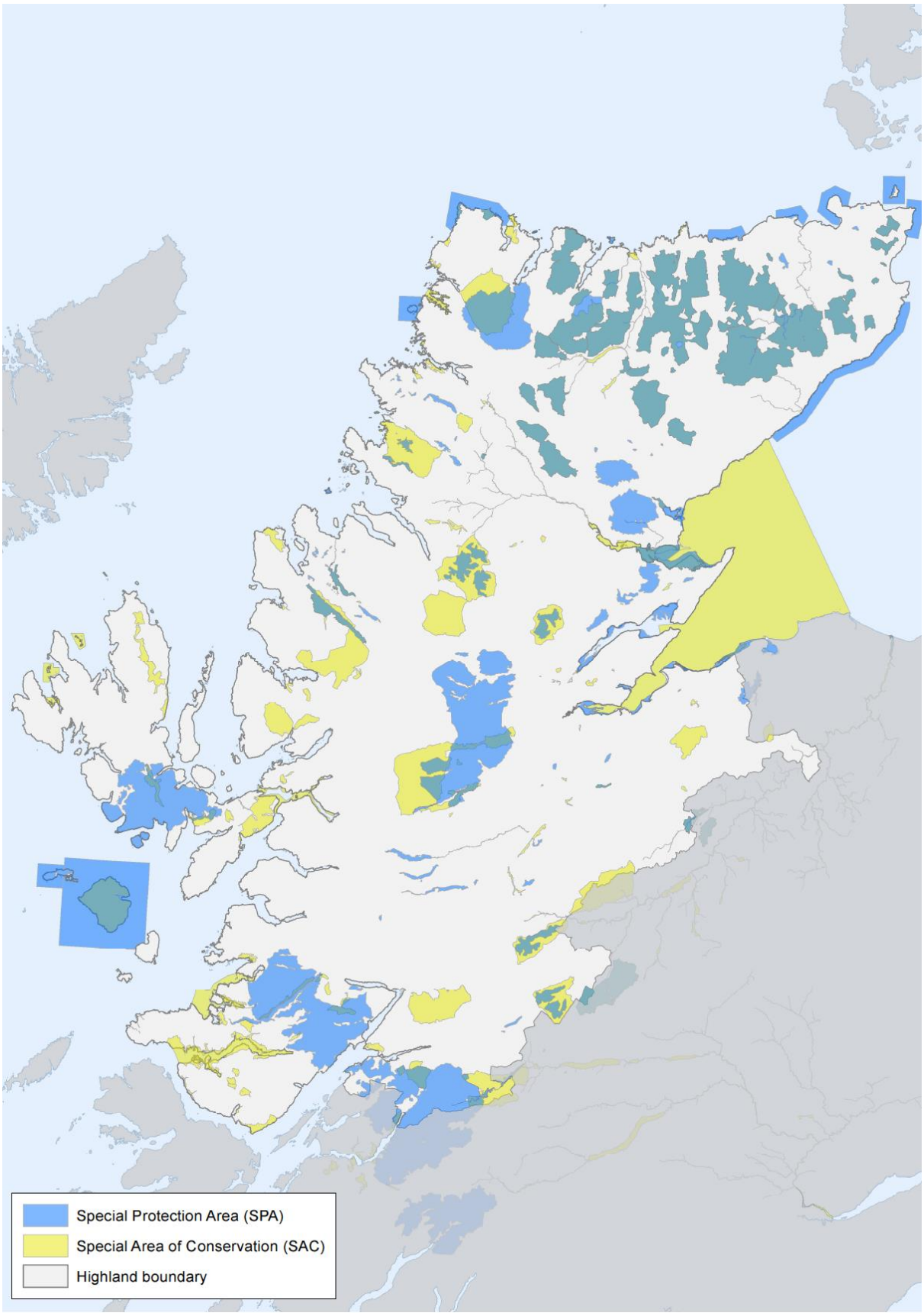
The information in this appendix shows baseline data for Highland against the SEA Objectives. It consists of a series of maps and links to sources:

Baseline Environmental Data	Source
1 - Biodiversity, Flora & Fauna	
There are currently 356 SSSI's, 89 SAC's, 44 SPA's, 18 NNR's, 11 Ramsar, 1 Local Nature Conservation Site in the Plan area.	SNH website for information on designated sites, site condition and qualifying interests/features: www.snh.org.uk Scottish Biodiversity Strategy (Scotland's Biodiversity - It's In Your Hands; 2020 Challenge for Scotland's Biodiversity)
Flow Country, nominated to UNESCO as a tentative World Heritage Site, is a vitally important habitat on a regional and international scale. It is the largest expanse of blanket bog in Europe, and covers about 4,000 km^2 and home to a rich variety of wildlife, and is used as a breeding ground for many different species of birds.	The Peatlands of Caithness and Sutherland - Management Strategy 2005 - 2015
Highland supports 15 of the 65 (c.25%) priority habitats of conservation importance in Scotland with over half of their Scottish distribution area in Highland. Highland also supports 864 of 1149 (75%) of the priority species of conservation importance in the UK.	Highland Biodiversity Action Plan www.highlandbiodiversity.com Habitat and Birds Directive – Annex 1
Protected Species	THC's Statutorily Protected Species Supplementary Guidance. SNH website. Presence of protected species may be able to be derived from the NBN Gateway http://data.nbn.org.uk/ (although absence of any record is not conclusive that the species is not present).
In the Plan area there are 5,037 Ancient Semi-Natural Woodland sites, 22,782 Native Woodland and Nearly Native Woodland sites, 1,596 Plantations on Ancient Woodland Sites and 128 Tree Preservation Orders.	The Highland Forest and Woodland Strategy. Forestry Commission Scotland: www.forestry.gov.uk/scotland Native Woodland Survey of Scotland
Mapped extent of Green Networks	Green Networks Supplementary Guidance
8 Nature Conservation Marine Protected Areas	SNH website for information Marine Protected Areas
35 Seal Haul-out Areas	Scottish Government website: Seal Haul-out Areas

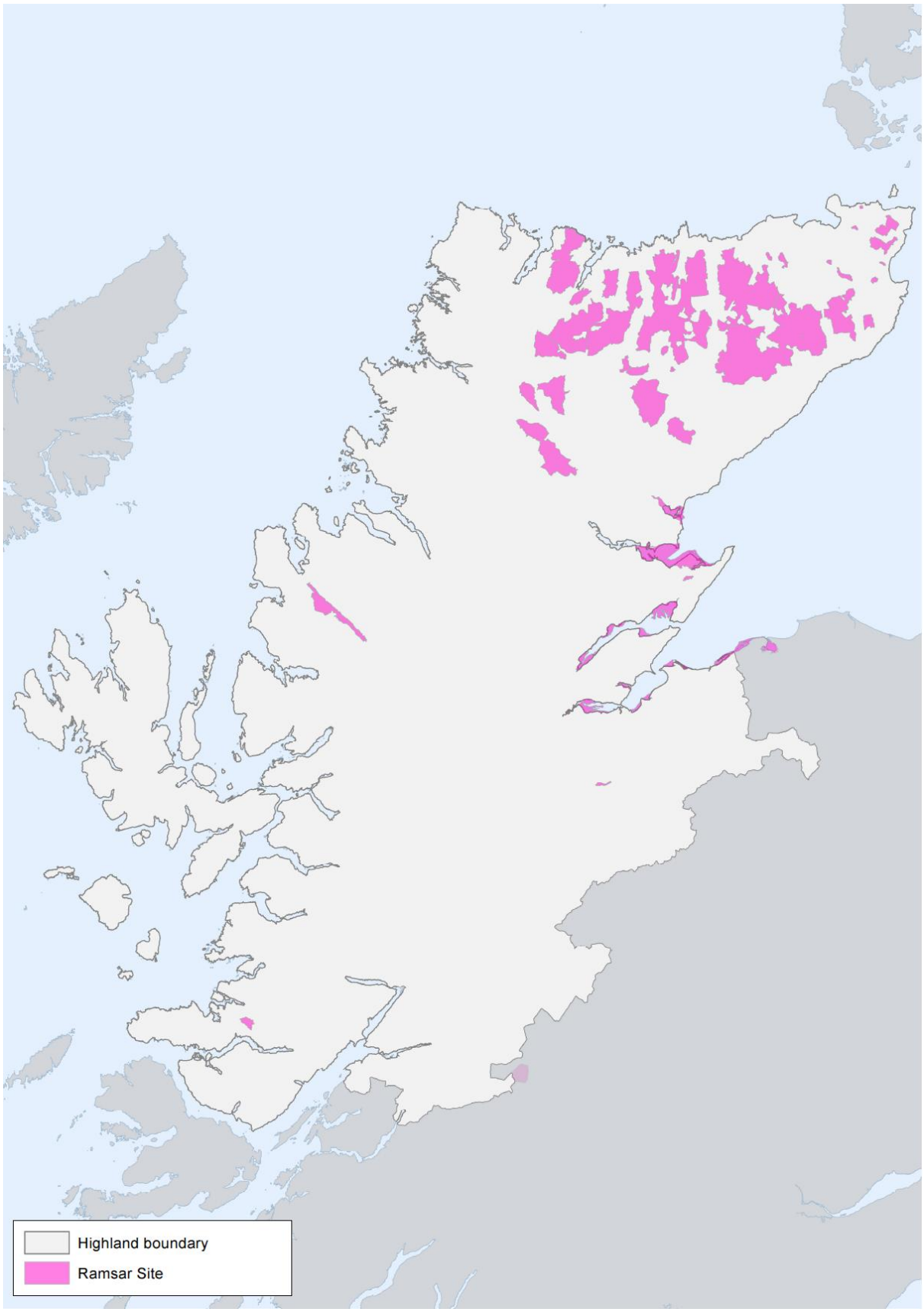
SSSIs and NNRs



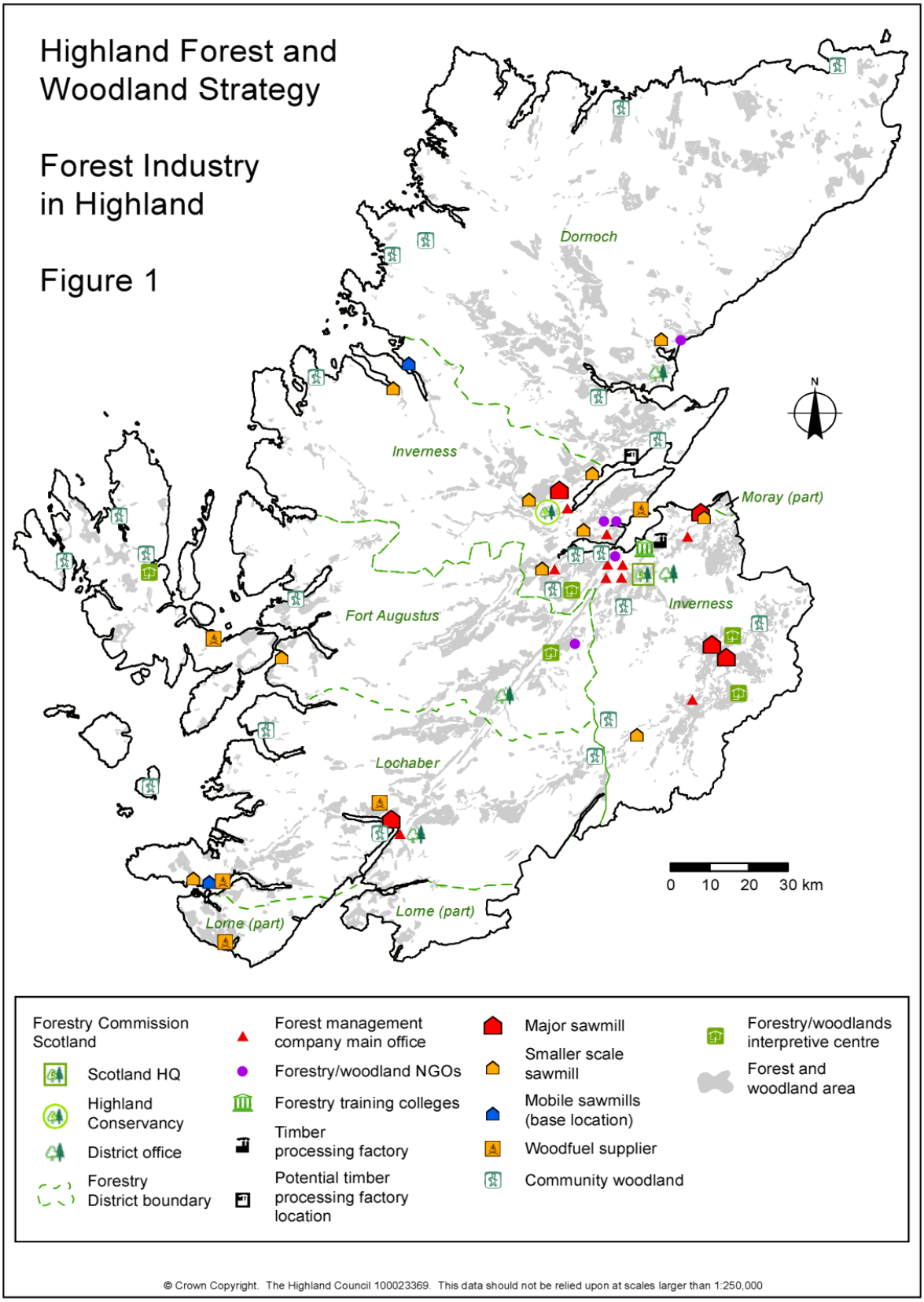
SPAs and SACs

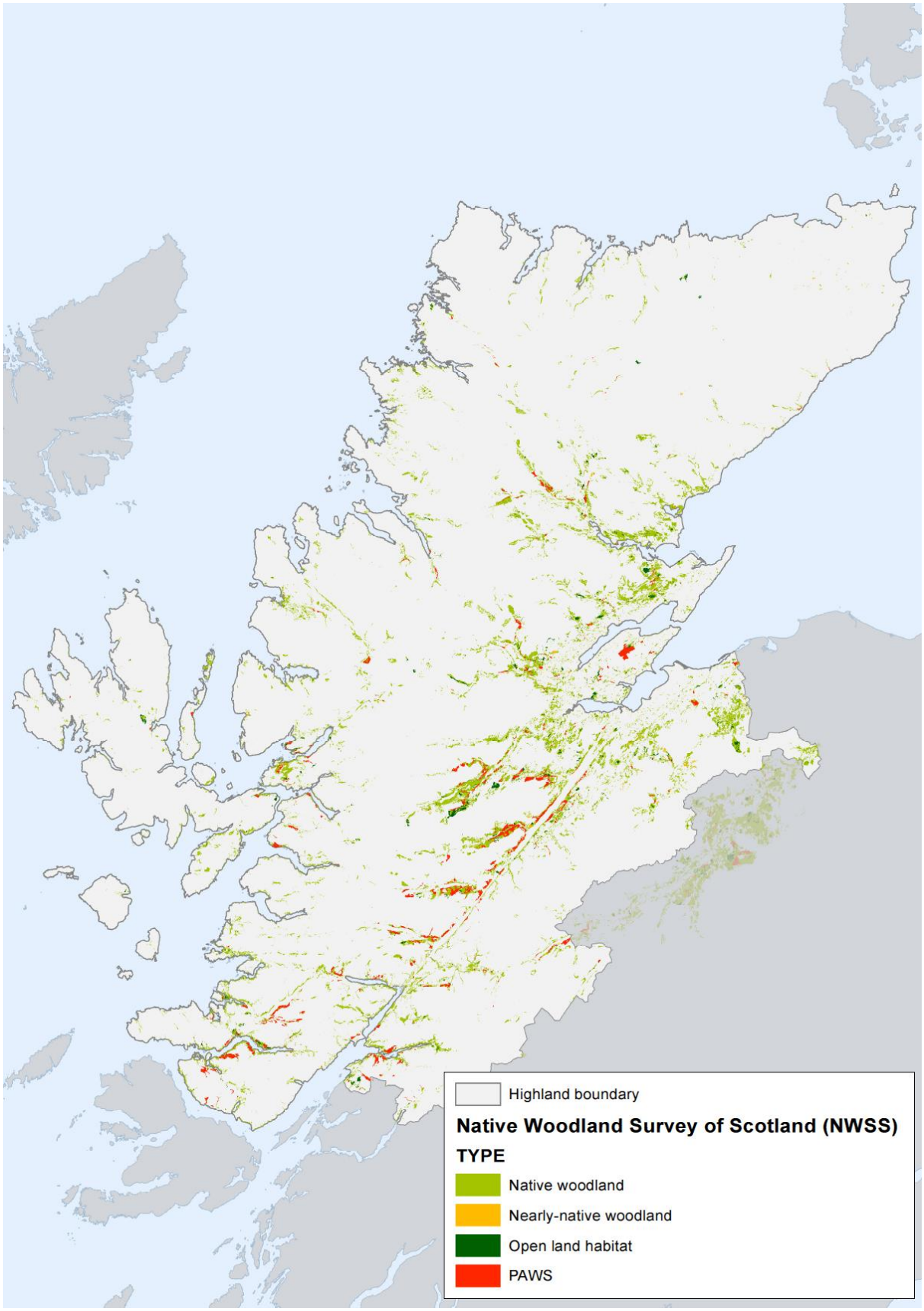


Ramsar Sites

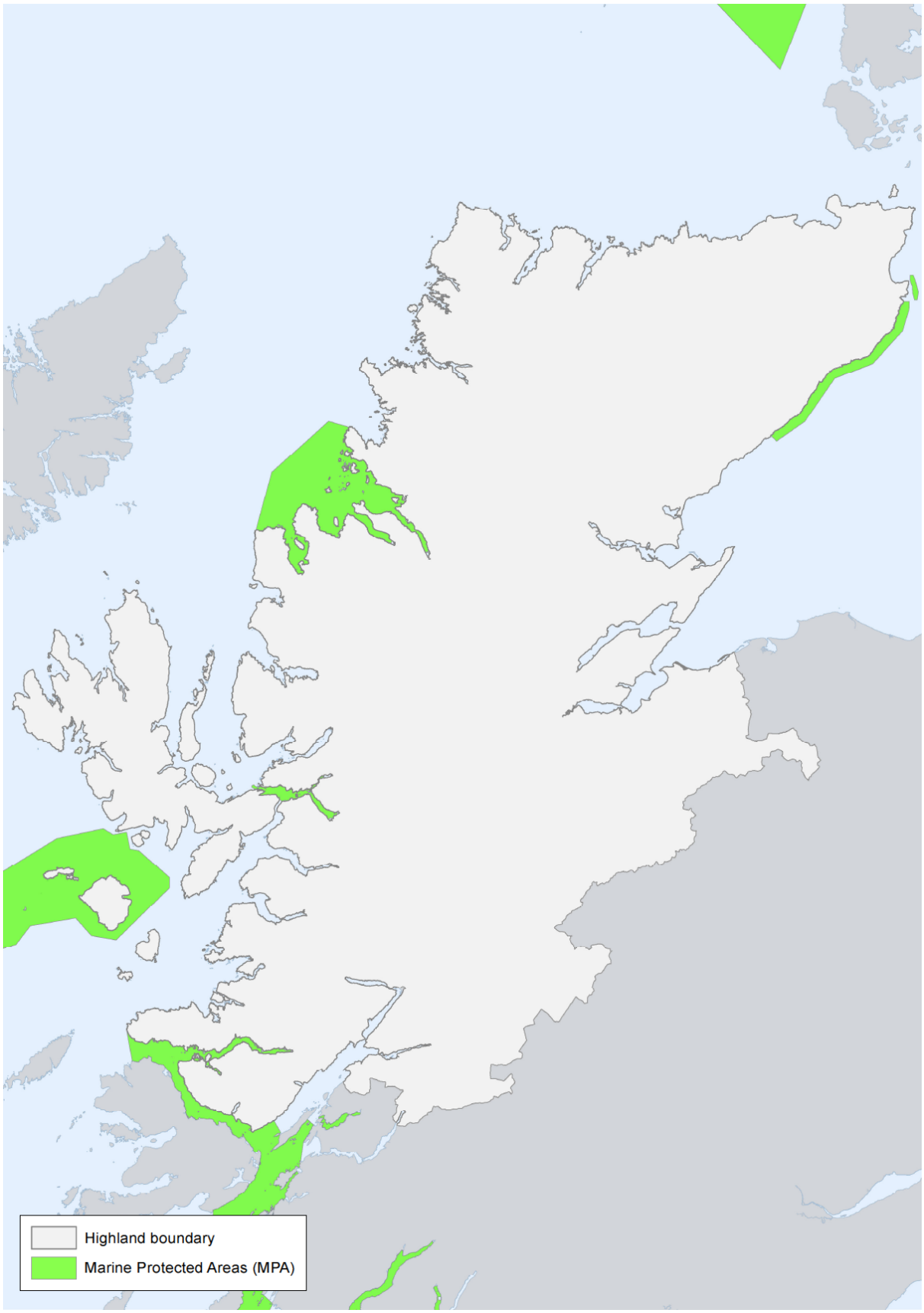


Forestry and Woodland

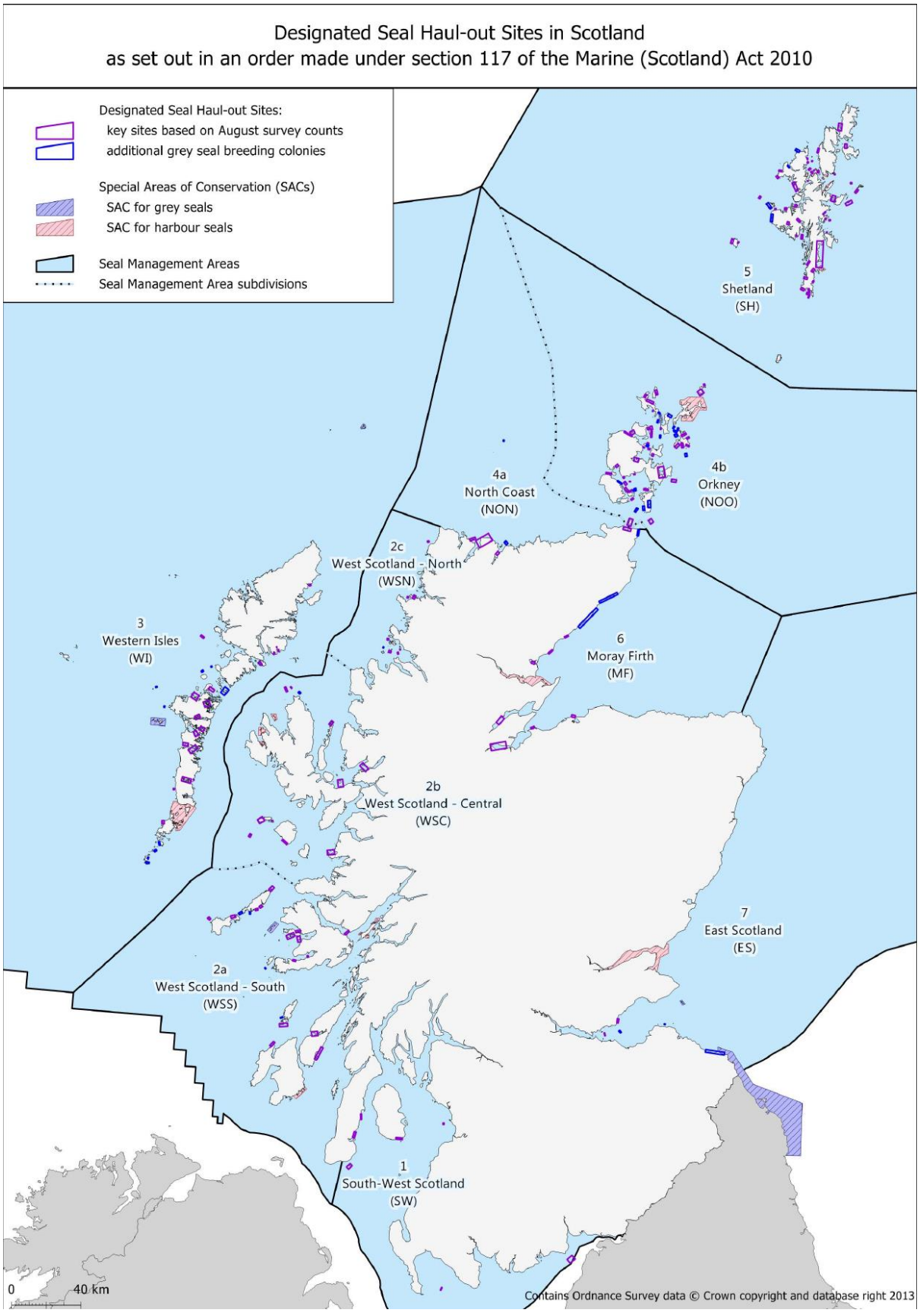



Highland boundary
Native Woodland Survey of Scotland (NWSS)
TYPE
Native woodland
Nearly-native woodland
Open land habitat
PAWS

MPAs

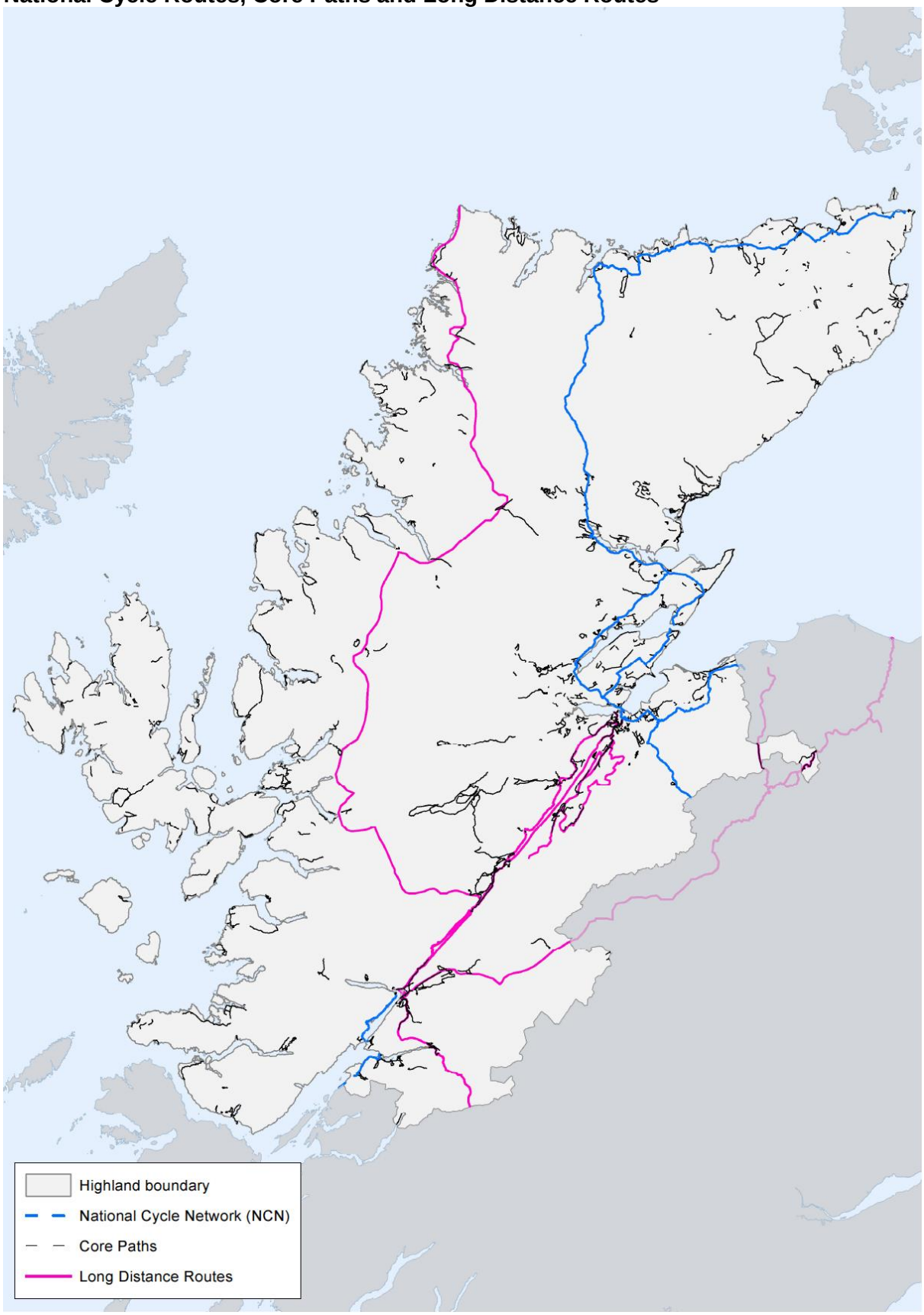


Seal Haul Out Sites



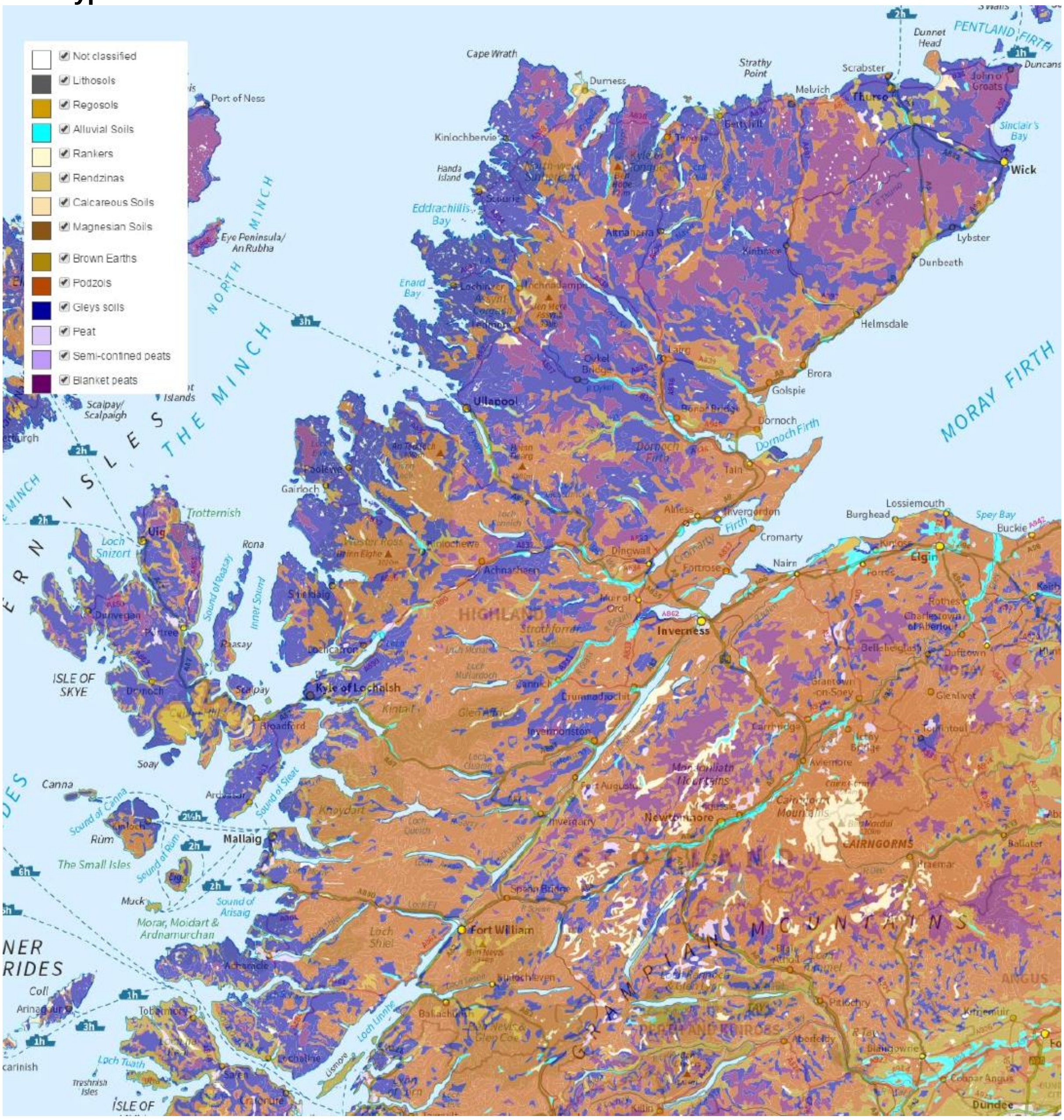
Baseline Environmental Data	Source
2 – Population and human health	
Current and future forecasts for demographics at Highland level: - Population of the plan area in 2011 was 232,100 with a population density of 8.7 people per sq km; Scottish average of 67.4. - Highland has witnessed steady growth over the last 30 years, with an 11.1% increase in population since 2001. - Population expected to increase to 235,607 by 2035. - There is expected to be an increase of c.28,500 people aged between 65 to 75+ between 2015 and 2035.	Census statistics and analysis www.ons.gov.uk Scottish Household Survey 2012 www.scotland.gov.uk/Topics/Statistics/16002
Fragile areas - Highland has 17 datazones in the most deprived 15% in Scotland.	Scottish Index of Multiple Deprivation http://www.highland.gov.uk/NR/rdonlyres/796EA9D0-C754-4A2D-9799-DBB026E6A611/0/simd2004_paper.pdf Highland Council Deprivation and Fragility Informaton
Health and well-being: current situation and forecasts for future trends on a variety of topics including health and crime.	www.isdscotland.org Transport Scotland: Household Survey 2012 www.audit-scotland.gov.uk www.transportscotland.gov.uk/news/scottish-household-survey-travel-diary-2012
School rolls - many of the primary and secondary schools are significantly under capacity.	THC School roll forecasts
Information on physical activity and current and planned active travel projects.	2012 Scottish Household Survey www.scotland.gov.uk/Topics/Statistics/16002 Active Travel audits are available for Alness, Invergordon, Dingwall, Fort William, Inverness, Tain, Nairn, Thurso and Wick. Sustrans National Cycle Network Map: www.sustrans.org.uk/ncn/map/national-cycle-network
Greenspace Mapping and attitudes to Greenspace in Scotland	THC Open Space Supplementary Guidance and Greenspace Audit Greenspace Scotland www.greenspacescotland.org.uk/audits-and-strategies.aspx Scottish Household Survey 2012 www.gov.scot/Topics/Statistics/16002 SNH - Attitudes to Greenspace in Scotland

National Cycle Routes, Core Paths and Long Distance Routes

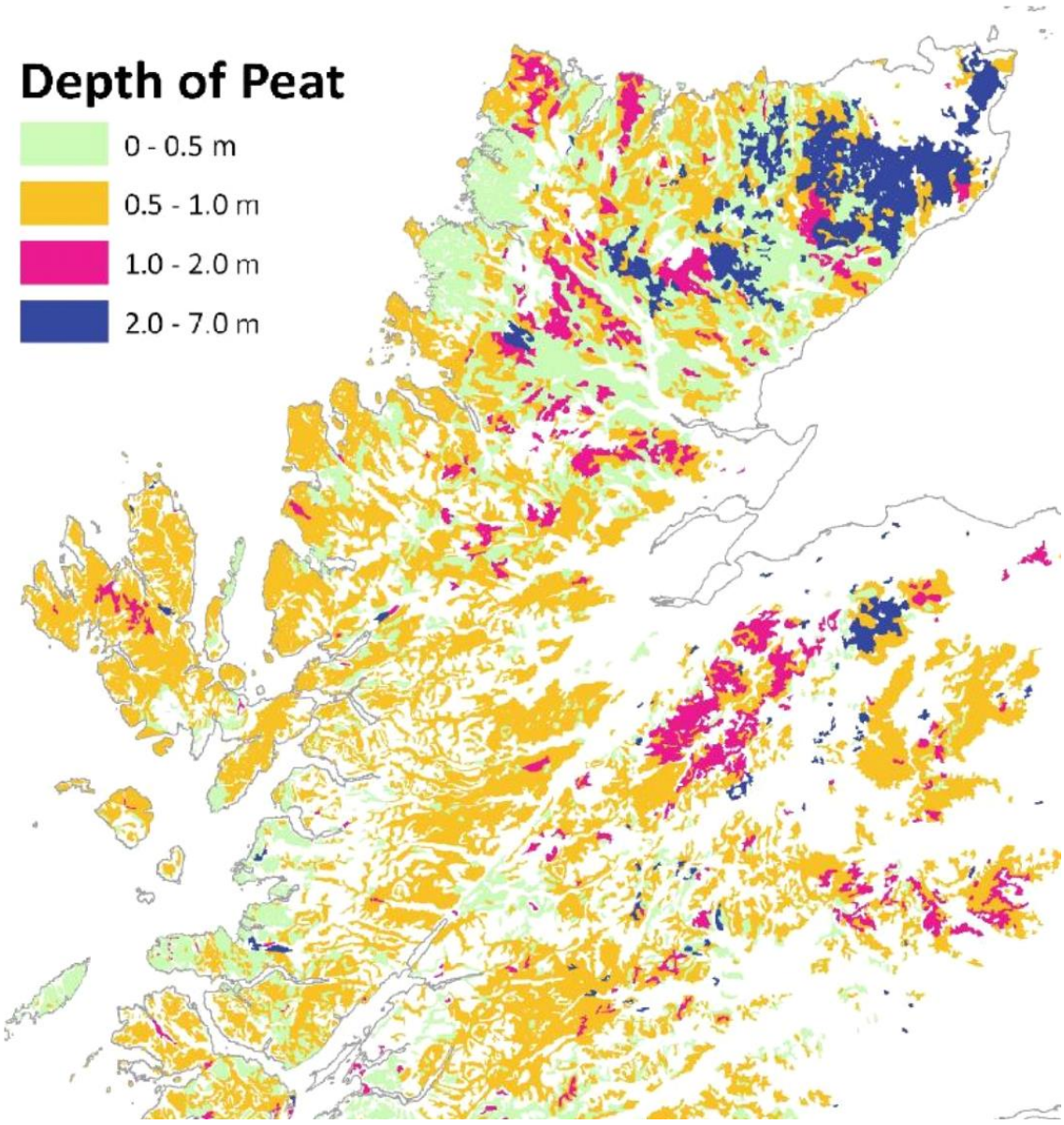


Baseline Environmental Data	Source
3 – Soils & Peat	
Erosion of soils from poor path construction	No data available but possible monitoring of THC core path plans.
Contaminated Land	Highland Council Contaminated Land Database. Scottish Vacant and Derelict Land Survey
Agricultural land - land use, employment and production information. Crofting in Highland. Prime agricultural land (considered to be 3.2 and above).	National Farmers Union Scotland www.nfus.org.uk/facts_index.asp Scotland's Soils www.soils-scotland.gov.uk/data/lca250k Crofting Commission Annual Report www.crofting.scotland.gov.uk/documents.asp?catid=29
Key indicators of soil quality	Soil Indicators for Scottish Soils sifss.hutton.ac.uk/
Carbon rich soils	Scotland's Soils – survey data www.soils-scotland.gov.uk/data/soil-survey SNH www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/
Geology - Geological Conservation Review sites (GCRs)	www.scottishgeology.com/ SNH GCR Sites

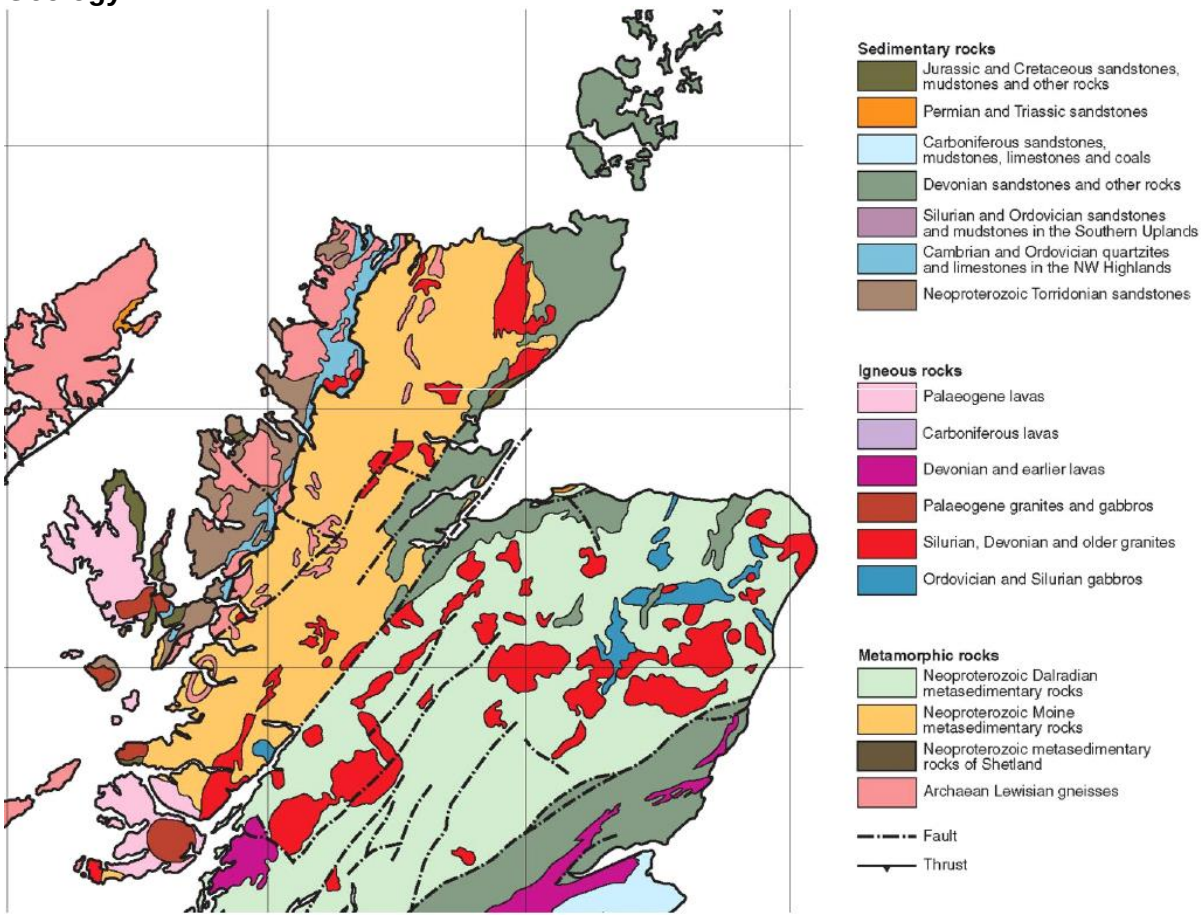
Soil Types


Not classified
Lithosols
Regosols
Alluvial Soils
Rankers
Rendzinas
Calcareous Soils
Magnesian Soils
Brown Earths
Podzols
Gleys soils
Peat
Semi-confined peats
Blanket peats
Cape Wrath
Durness
Strathy Point
Scrabster
Thurso
Wick
Ullapool
Inverness
Fort William
Mallaig
ISLE OF SKYE
MORAY FIRTH
THE MINCH
Dornoch
Elgin
Nairn
Lossiemouth
Helmsdale
Brora
Golspie
Dundee

Peat Depth



Geology



Baseline Environmental Data	Source
4 – Water	
Flood risk	SEPA flood risk management maps Strategic Flood Risk Assessment - SEPA technical guidance to support Development Planning
Water Quality (Ecological Status)	River Basin Management Plans SEPA http://www.sepa.org.uk/environment/water/monitoring SEPA Water Quality Classifications
Hydro-power schemes	Hi-Energy www.hi-energy.org.uk/Renewables/Hydro-Energy.htm
Wave and tidal renewable energy	Hi-Energy www.hi-energy.org.uk/Renewables/Tidal-Energy.htm www.hi-energy.org.uk/Renewables/Wave-Energy.htm

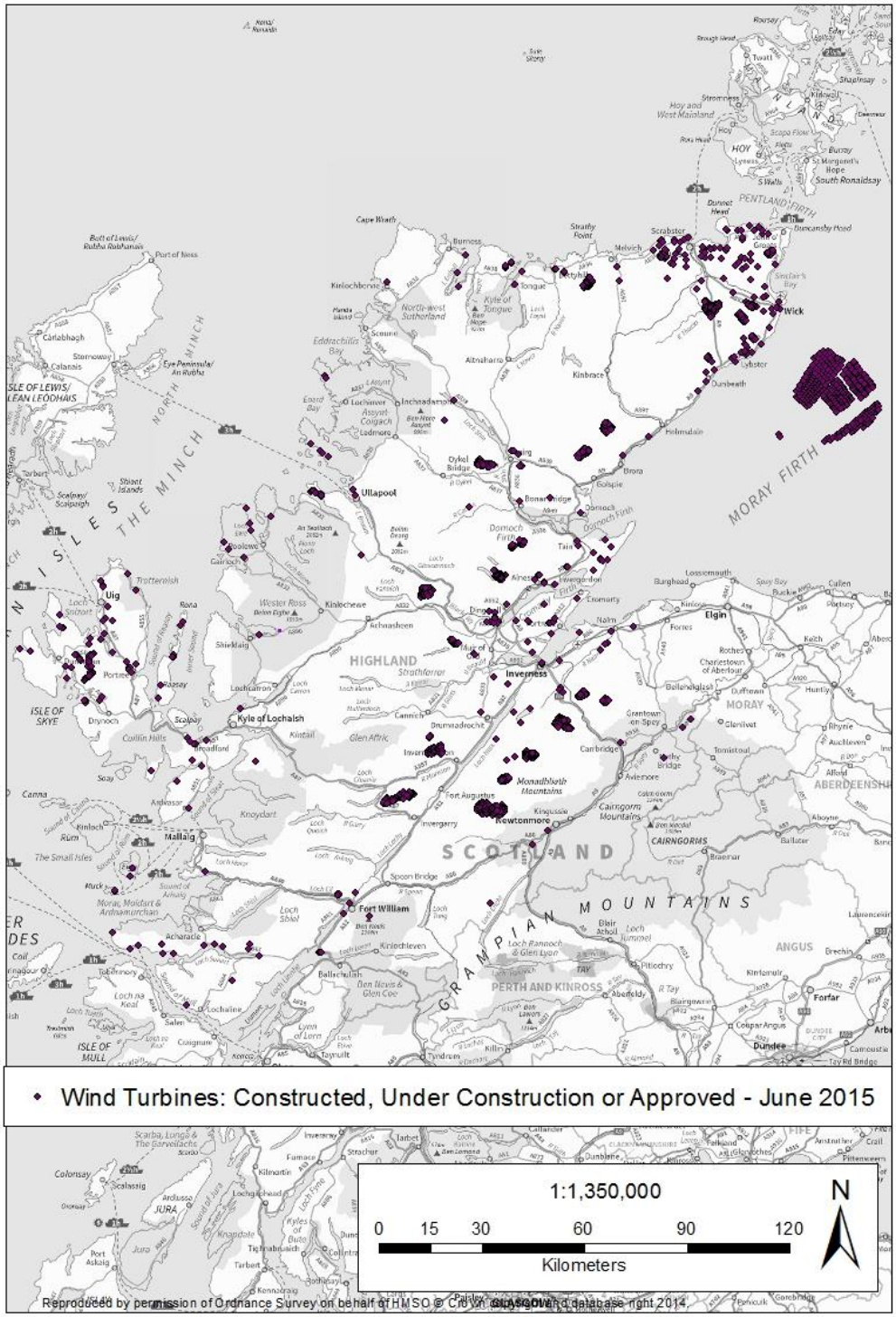
Baseline Environmental Data	Source
5 – Climatic Factors	
Vulnerability to effects of climate change	The Scottish Climate Change Impacts Partnership www.adaptationscotland.org.uk/1/1/0/Home.aspx Consideration of Climatic Factors within Strategic Environmental Assessment (SEA) www.scotland.gov.uk/Publications/2010/03/18102927/0 SEPA flood risk management maps Marine Climate Change Impacts Partnership UKCP09 The climate of the United Kingdom and

	recent trends. ukclimateprojections.defra.gov.uk http://www.sniffer.org.uk/
Energy Consumption	THC energy consumption www.highland.gov.uk/downloads/download/354/energy_consumption
Energy from renewable sources and promotion of renewable energy	DECC Renewable Energy Statistics: gov.uk/government/collections/renewables-statistics Scottish Government Renewable Planning Statistics: gov.scot/Topics/Statistics/Browse/Business/Energy/planningdata Renewable energy in THC buildings www.highland.gov.uk/info/1034/land_and_property/271/renewable_energy_in_our_buildings Highland Council Renewable Energy Strategy www.highland.gov.uk/info/198/planninglong_term_and_area_policies/152/renewable_energy Community Benefits from Renewables Highland Council Wind Turbine Map
Travel	THC Local Transport Strategy and Active Travel Plans www.highland.gov.uk/info/1523/transport_and_streets/121/local_transport_planning
Improve the use of sustainable building techniques	Designing for Sustainability in the Highlands

Baseline Environmental Data	Source
6 – Material Assets	
Vacant & Derelict Land Register	Scottish Vacant and Derelict Land Survey
Waste Generation and Management	Scotland's Zero Waste Plan Scotland's Environmental Waste Discovery Data Scottish Waste Sites and Capacity Tool Household Waste Summary Data THC Waste Data Report www.highland.gov.uk/downloads/file/13531/annual_waste_data_report_2011_to_2013
Core Path Plan & Rights of Way	The Highland Council (THC) /Scotways www.highland.gov.uk/info/1457/tourism_and_visitor_attractions/163/paths_in_the_highlands
Land Use Plan & Open Space Audit	THC Open Space Supplementary Guidance and Greenspace Audit: www.highland.gov.uk/info/178/ www.highland.gov.uk/info/178/local_and_statutory_development_plans/213/supplementary_guidance/8213/supplementary_guidance/8

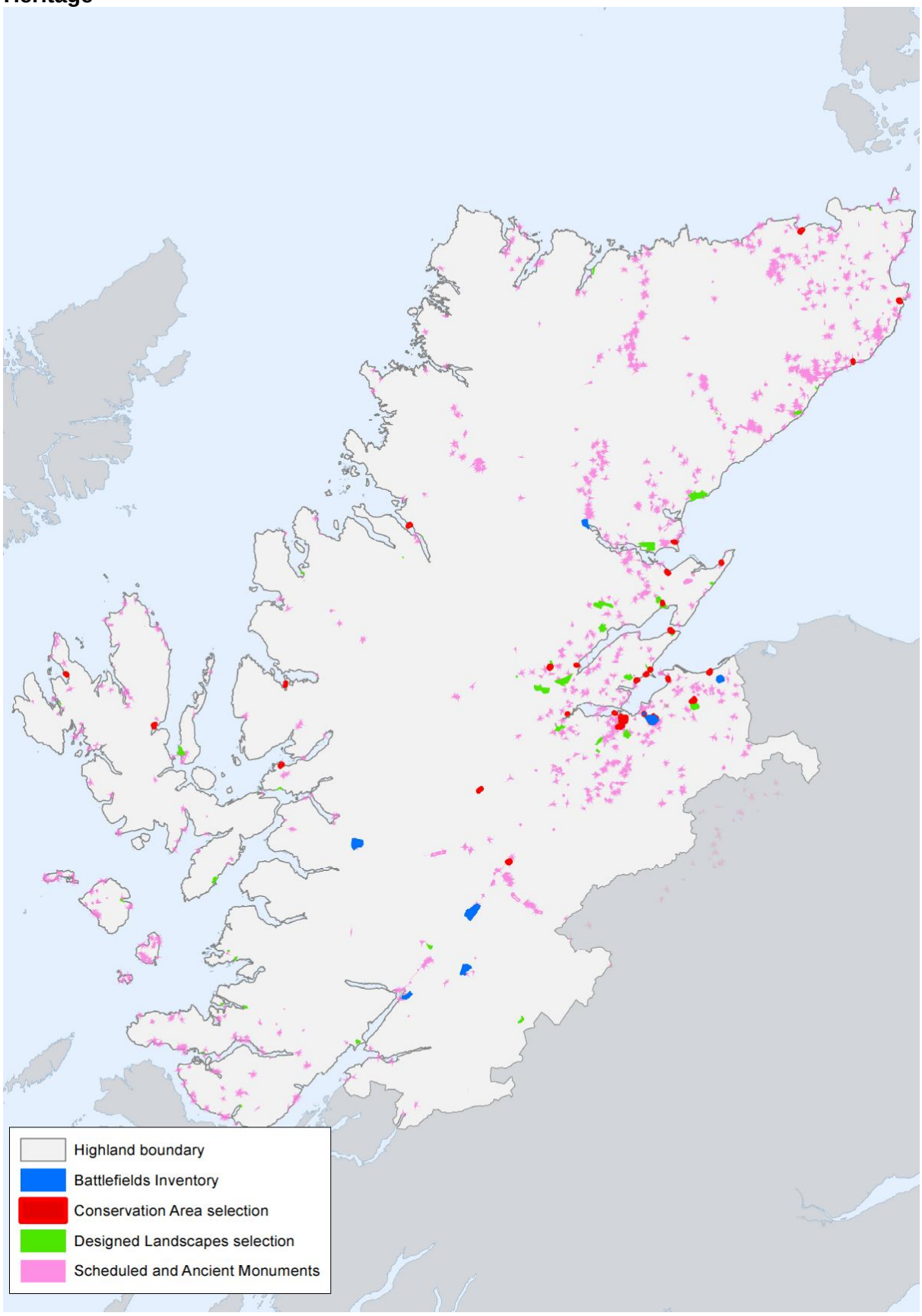
Wind Turbines

The Council has an interactive map available at www.highland.gov/uk/windmap which provides information on wind turbine developments across Highland. The following map is taken from the same source data.

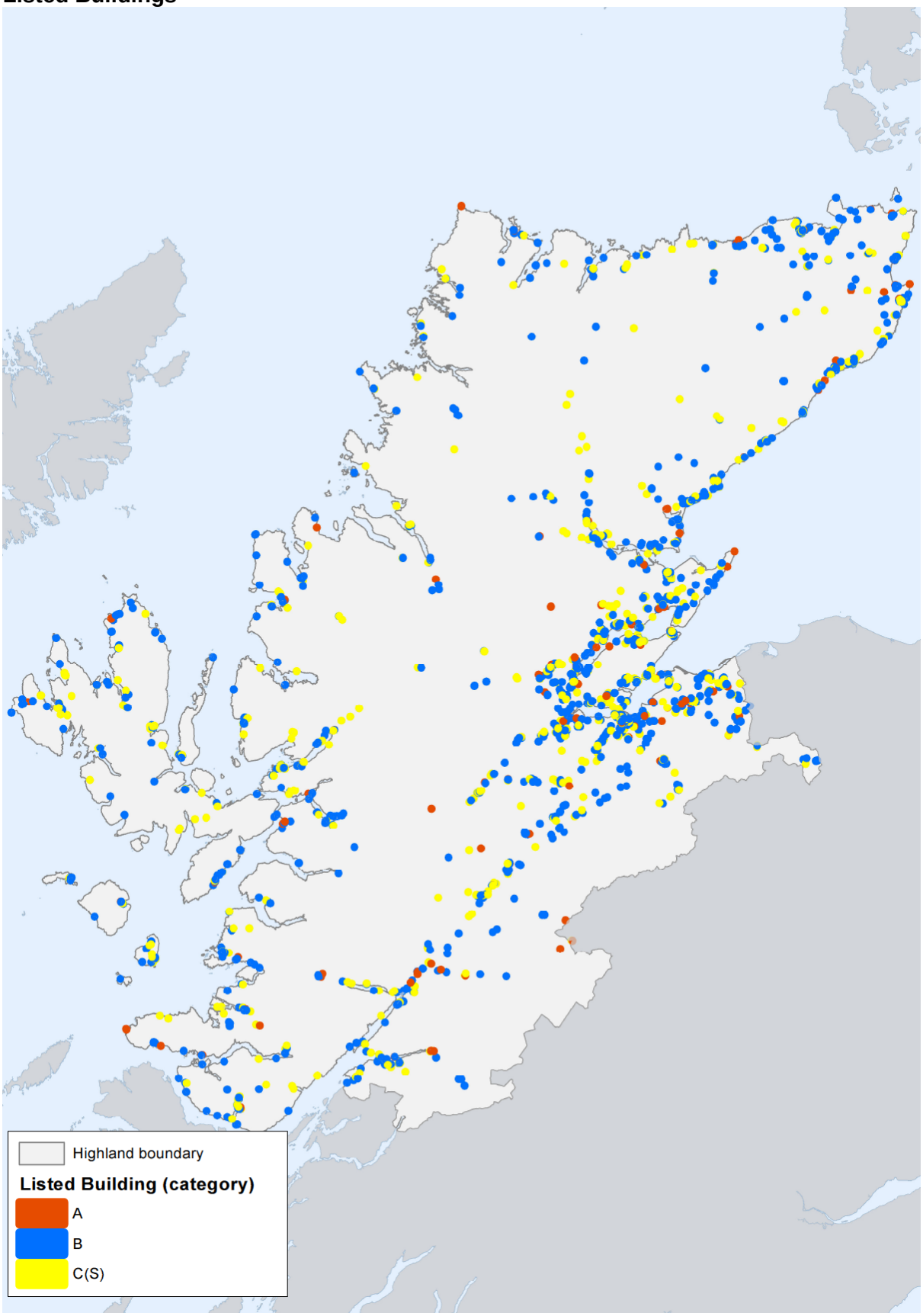


Baseline Environmental Data	Source
7 – Historic Environment and Cultural Heritage	
8 sites in Inventory of Historic Battlefields	Historic Environment Scotland data.historic-scotland.gov.uk/pls/htmldb/f?p=2000:10:0.
Listed Buildings A - 175 B - 1,121 C - 1,121	Historic Environment Scotland data.historic-scotland.gov.uk/pls/htmldb/f?p=2000:10:0.
1,201 Scheduled Monuments	Historic Environment Scotland data.historic-scotland.gov.uk/pls/htmldb/f?p=2000:10:0.
29 Conservation Areas	THC www.highland.gov.uk/info/192/planning_-_listed_buildings_and_conservation_areas/167/conservation/2
46 Gardens and Designed Landscapes	Historic Environment Scotland data.historic-scotland.gov.uk/pls/htmldb/f?p=2000:10:0.
44,309 Historic Environment Record Sites	THC www.highland.gov.uk/info/20004/local_history_and_heritage/155/highland_historic_environment_record
Buildings at Risk	Historic Environment Scotland - Buildings at Risk Register www.buildingsatrisk.org.uk/.

Heritage

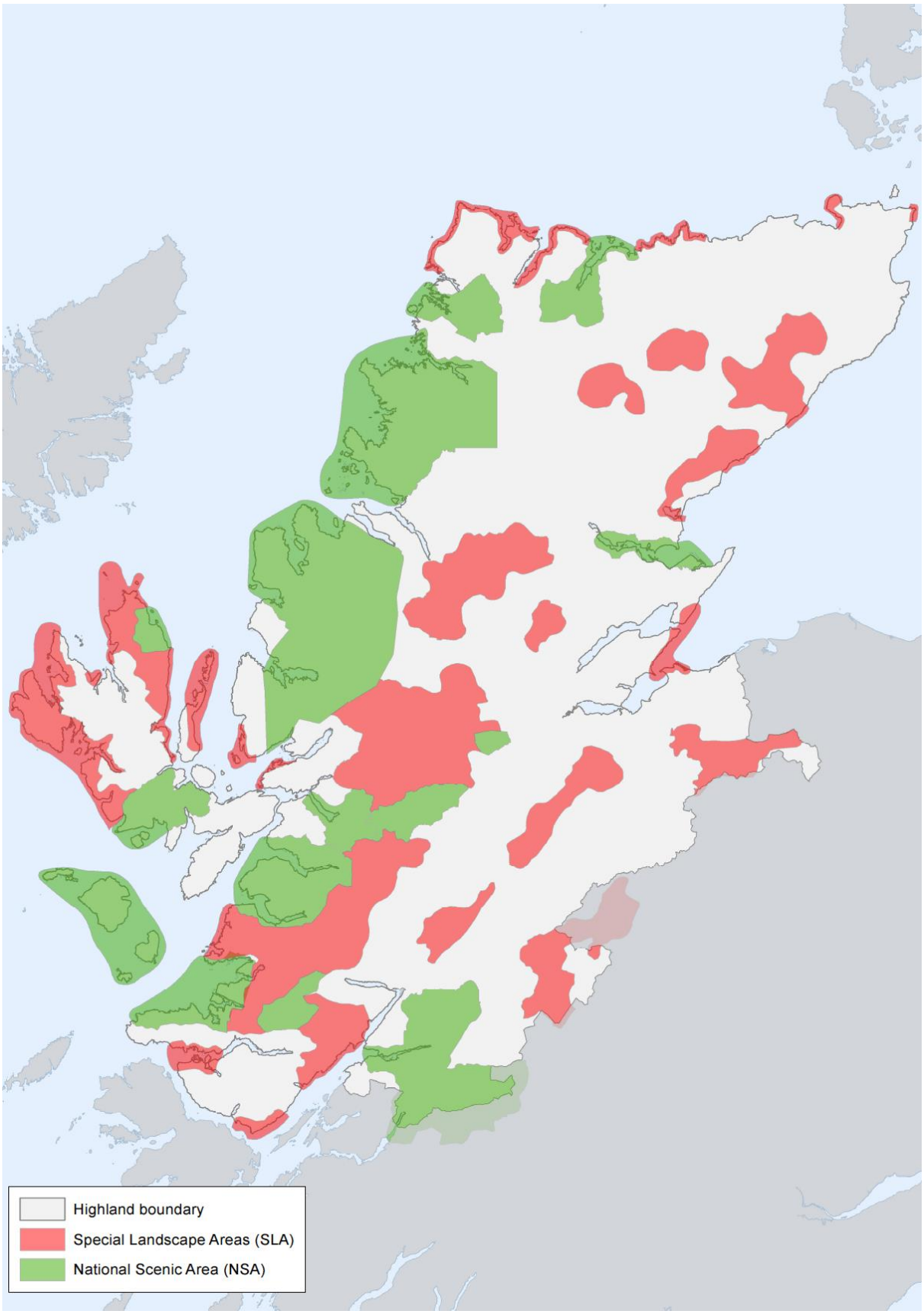

Highland boundary
Battlefields Inventory
Conservation Area selection
Designed Landscapes selection
Scheduled and Ancient Monuments

Listed Buildings

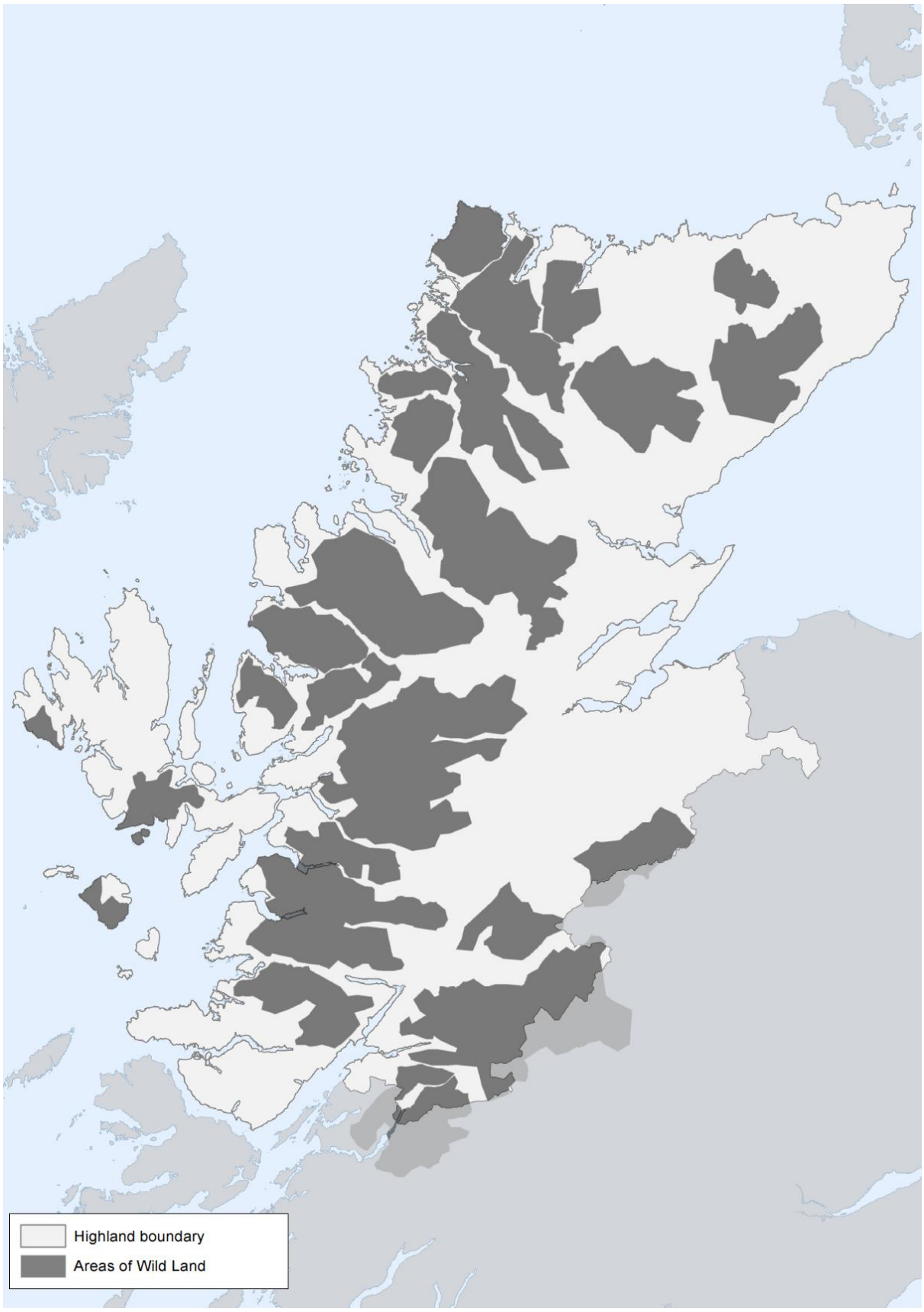


Baseline Environmental Data	Source
8 – Landscape	
Landscape Character Assessments and Landscape Capacity Studies	SNH www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/lca/
15 National Scenic Areas	SNH www.snh.gov.uk/protecting-scotlands-nature/protected-areas/national-designations/nsa/
25 Wild Land Areas	SNH www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wild-land/mapping/
27 Special Landscape Areas	SLA Citations www.highland.gov.uk/developmentplans
Unspoilt Coast (based on 'Isolated Coast' defined within the Highland Coastal Strategy)	THC Highland Coastal Strategy

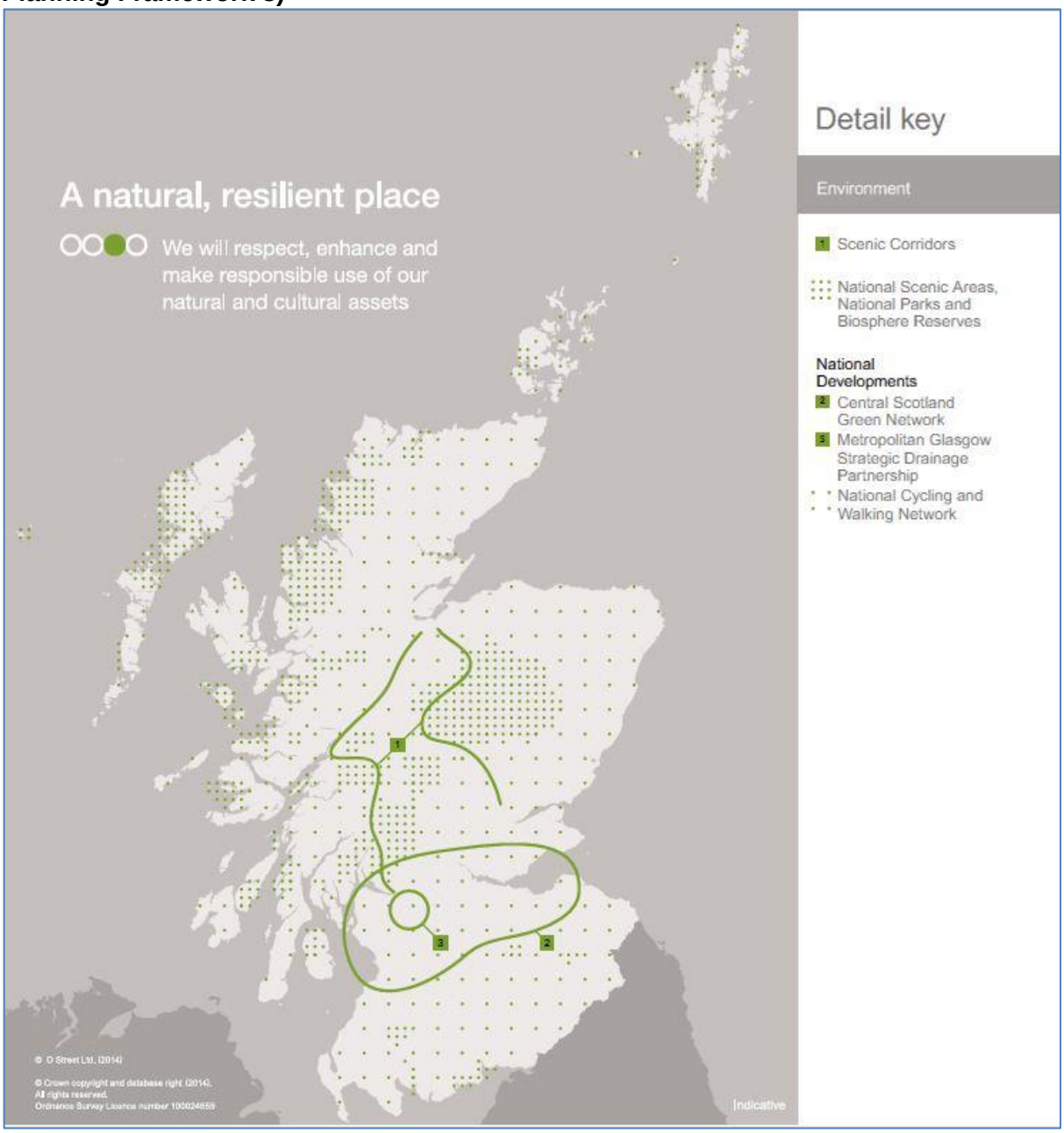
NSAs and SLAs



Wild Land Areas

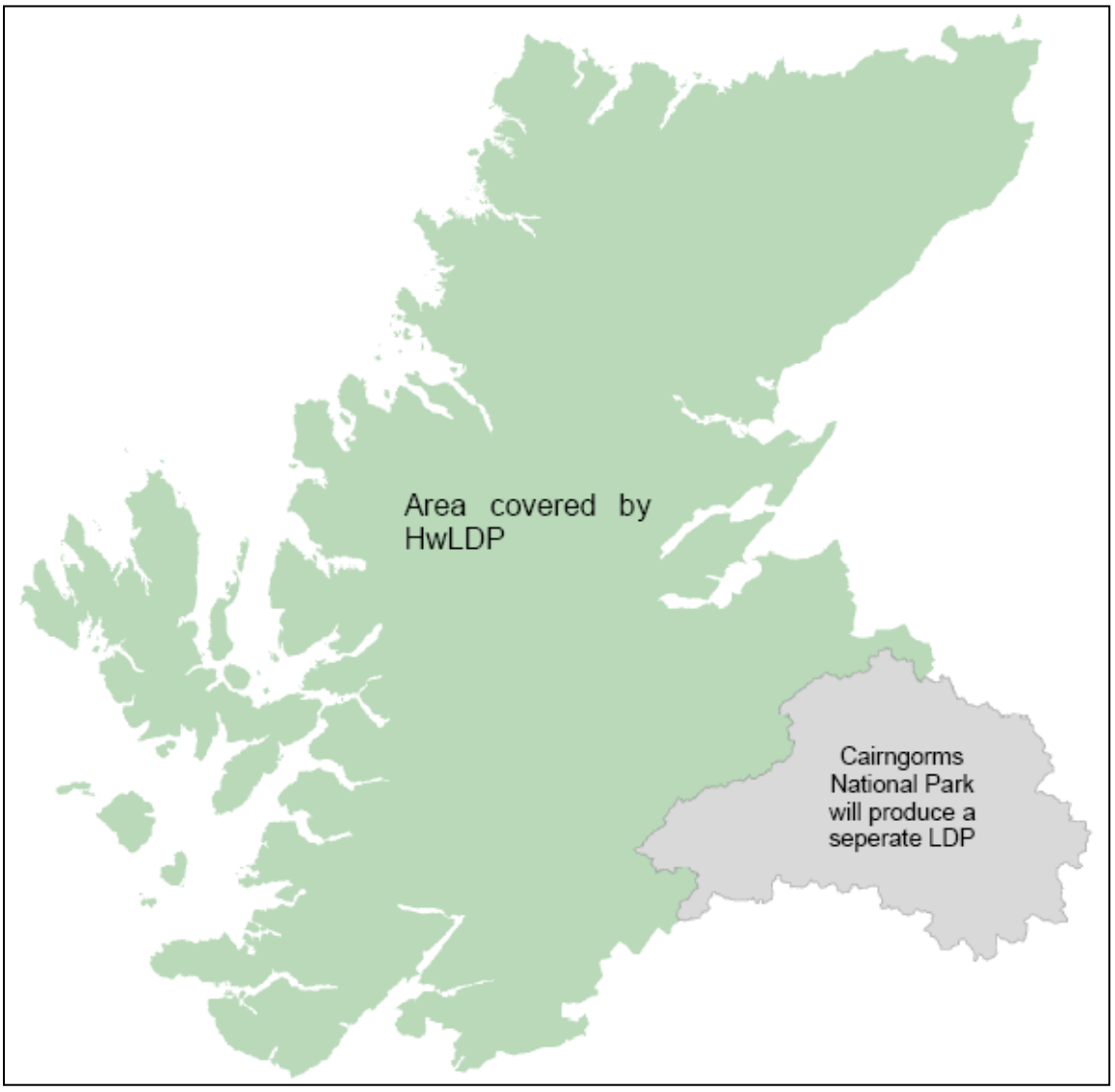


Scenic Corridors (A82 and A9 trunk roads as far north as Inverness, as identified in National Planning Framework 3)



National Park

The Supplementary Guidance will be applicable to all planning applications, and applications under Section 36 of the Electricity Act 1989 for on-shore wind energy developments in the Highland Council's development planning area (the area covered by the Highland-wide Local Development Plan). It is noted that the Cairngorms National Park lies outside, but immediately adjacent, the area to be covered by the Supplementary Guidance.



Appendix 3 – Assessments

This section contains detailed assessments of the section of the Supplementary Guidance and their reasonable alternative.
The assessment considers what level of impact the section and its reasonable alternative may have in the short, medium and long term on each of the SEA Objectives.
The matrix also includes a justification of the assessment for each SEA Objective. This is intended to guide the reader through the decision making process. To aid in this there are assumptions recorded at the beginning of each assessment.
For consistency the following scoring system has been used throughout the assessments matrices:

Significant Positive Impact	Minimal Positive Impact	Neutral Impact	Minimal Negative Impact	Significant Negative Impact	Positive and Negative Impacts	Unknown Impact
++	+	=	-	--	+/-	??

Each assessment will be followed by a concise commentary on the findings of the assessment.
It should be noted that all assessments have been carried out assuming that the mitigation is already included in the guidance.
The key considerations below have been used in the assessment of each of the sections/reasonable alternatives.

1	**To conserve and where possible enhance biodiversity and accord to the protection of valued nature conservation habitats and species** • Will it contribute to the protection and enhancement of biodiversity in Highland? • Will it have a detrimental effect on protected species? • Will it contribute to achieving local and regional biodiversity action plan targets? • Will habitats of importance for biodiversity be protected? • Will designated sites be protected? • Will it avoid the introduction or spread of non-native species? • Will habitat networks and corridors be maintained or enhanced?
2	**To improve the living environment for all communities and promote improved health of the human population** • Will it ensure better connectivity of open spaces? • Will it create or enhance green networks for people or wildlife? • Will it give additional benefit to human health? • Will human health be significantly reduced? • Will it ensure a healthier lifestyle for the residents within the settlements?
3	**Safeguard the soil quality, geodiversity and improve contaminated land** • Will it lead to the avoidance of areas of landslide/landslip? • Will it ensure the re-use of brownfield sites? • Will it prevent the sealing of good quality soil on sites? • Will it protect areas of importance for geodiversity in Highland? • Will carbon storage of peat land be protected?
4	**Manage and reduce flood risk and protect the water environment** • Will it ensure new developments are free from flooding? • Will it reduce the vulnerability of existing areas to flooding? • Will it enhance natural drainage? • Will it ensure SUDS are included in new residential developments? • Will it ensure development is supported by appropriate drainage infrastructure • Will it ensure that development has no detrimental impact on the water environment? • Will it ensure developments enhance the water environment where possible?
5	**Reduce greenhouse gases and contribute to the adaptation of the area to climate change**

	• Will it reduce the need to travel? • Will it ensure an increase in use of more sustainable transport methods? • Will it ensure better opportunities for walking and cycling? • Will it ensure more renewable energy production where appropriate? • Will it ensure energy efficiency is taken into consideration in new developments? • Will it ensure suitable connection to electricity infrastructure? • Will it reduce the risk of coastal inundation through sea level rising?
6	**Manage, maintain and promote sustainable use of material assets** • Will it improve connectivity of open space, movement (including roads, footpaths etc) and access, including green network? • Will it support the minimisation of waste production? • Will it support the achievement of government targets through the use of the waste management hierarchy? • Will it ensure recovery of energy and heat from waste is considered where appropriate?
7	**Protect and where appropriate enhance the historic environment** • Will it protect and enhance the historic environment?
8	**Protect and enhance the character, diversity and unique qualities of the landscape** • Will local diversity and distinctiveness be maintained or enhanced? • Will the special qualities of designated areas be maintained or enhanced? • Will existing landscape character be maintenance or enhanced? • Will visual impact be minimised? • Will scenic value be maintained or enhanced? • Will it safeguard the ability of people to experience qualities of wildness?

Key Development Plan Considerations

The key development plan considerations section should not be read or applied in isolation.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	+	+	+	This section aims to ensure that developments do not have unnecessary impacts on the natural environment and that mitigation is provided where necessary.	Ensure HwLDP2 policies continue to cover all these topics [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]	THC	Preparation of HwLDP2 ongoing.
2	+	+	+	This section covers tourism and recreation interests, quantity and quality of public access and safety and amenity at sensitive locations. Mitigation for development could potentially be improved path networks and new opportunities for access.			
3	+/-	+/-	+/-	Peat is covered in this section and it is helping to ensure that developments are located in areas that minimise impact on peat by appropriate siting and design and other mitigation. There is however the potential for some net loss of peat.			
4	+	+	+	This section highlights that any wind energy development should demonstrate that it will not have a significant adverse effect individually or cumulatively on the water environment and that mitigation will be required where necessary. It is unlikely that it will have any impact on reducing flood risk.			

5	+	+	+	This section of the SG is about ensuring that important features and assets are safeguarded in relation to wind energy development. It is not directly having an impact on climate change or ensuring there are more renewable energy developments. However, indirectly it is ensuring that wind energy developments are not developed on areas of deep peat and it is helping to ensure that renewable energy is located where it is appropriate for it to be located.			
6	+	+	+	This section has the potential to influence where access tracks and other infrastructure is located.			
7	+	+	+	This section aims to ensure that developments do not have unnecessary impacts on the site, context or setting of historic environment assets and that mitigation is provided where necessary.			
8	+	+	+	This section is trying to ensure that wind energy developments are located in appropriate places with appropriate mitigation and that landscape has been considered. It also sets out how Wild Land Areas will be considered in a wind energy proposal.			

Commentary: The key development plan considerations section provides a fuller interpretation of how important features and assets safeguarded through policies in HwLDP are expected to be safeguarded in relation to wind energy development. Whilst it is anticipated that this section will have a number of positive effects there may still be localised detrimental impacts of individual proposals, but it ensures that important features and assets are considered at planning application stage, with the extra detail provided in this section and not just relying on HwLDP policies. [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]

Key Development Plan Considerations: Alternative

Continue with approach set out in 'Onshore Wind Energy Interim Supplementary Guidance- Development Guidelines'

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	+/-	+/-	+/-	This section of the document may conserve and enhance biodiversity, but it is not up to date or compliant with new NPF3 and SPP, and therefore does not take into consideration the features and assets that new national policies set out. Therefore there may be certain assets or features that are inadequately addressed in this section. Moreover, the inclusion of an out of date Spatial Framework, separation of certain details into a separate document for small-scale proposals and the range of thresholds set out make the section more confusing than the preferred approach. This may lead to les effective policy protection for biodiversity.			

2	+/-	+/-	+/-	This section is not up to date or compliant with new NPF3 and SPP but may contribute to improving the living environment. Issues around visual amenity, noise pollution, road and rail safety, and shadow flicker are addressed and therefore offer some potential to meet this objective. However, the structuring into two separate documents and limitations set out in the issues described in the Onshore Wind Energy Consultation Paper, mean this alternative would be less effective in delivering this objective, compared to the preferred approach.			
3	-	-	-	This objective is only partially addressed in the two documents. Carbon rich soil, deep peat and priority peatland habitats (CPP) are not included and therefore this aspect of the objective is not addressed, with potential to cause some minimal negative impact.			
4	+	+	+	This section addresses this objective and highlights that any wind energy development should demonstrate that it will not have a significant adverse effect individually or cumulatively on the water environment and that mitigation will be required where necessary. It is unlikely that it will have any impact on reducing flood risk.			
5	+	+	+	This section of the document contributes to this objective by setting out criteria that will be used when considering development proposals. This provides clarity for the development industry, supporting the development of renewables that contribute to reducing GHGs and offer scope to adapt to climate change.			
6	=	=	=	This section does not address material assets			
7	+	+	+	This section aims to ensure that developments do not have unnecessary impacts on the site, context or setting of historic environment assets and that mitigation is provided where necessary.			

8	+	+	+	This section sets out how onshore wind energy developments should take account of, and safeguard the unique Highland landscapes. However, it is not in line with new SPP, does not refer to the 2014 map of wild land areas, nor does it give indication of the new weight afforded to NSAs and National Parks in the revised Spatial Framework. Therefore the guidance does offer positive effects for the landscape, but does not address contemporary issues.			

Commentary:
Some SEA objectives are not met in this section. Moreover, due to the age of the interim SG, a lot of the content is not up to date, not compliant with national policy, and does not take account of the ever-changing development pattern in Highland. Therefore the Draft SG addresses these issues, and provides more relevant and effective guidance.

Highland Strategic Capacity

The Highland Strategic Capacity section should not be read or applied in isolation. It should be noted that it is the methodology that is being assessed and not the output of any study area.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.	Further consultation on study areas output.	THC	Ongoing
2	=	+	+	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective. However it may indirectly have a positive impact on human health due to the perceived benefits that any safeguarding of areas may bring.			
3	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.			
4	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.			
5	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.			
6	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.			

7	=	=	=	It is unlikely that the highland landscape sensitivity section will have any direct effect on this SEA Objective.			
8	=	+	+	This section should provide a positive effect for landscape issues in study areas, but will not have any impact on areas out with study areas. It will also take time for this work to be carried out so effects may not be felt in the short term.			

Commentary: The assessment is based on the approach that will be taken to study areas rather than the outputs of any analysis of study areas. It is anticipated that there could be positive effects on SEA Objectives 2 (human health) and 8 (landscape) in the medium and longer term once work is carried out on study areas.

Highland Strategic Capacity: Alternative

No reasonable alternative is identified

Commentary:
This section of the Draft SG is new, and it is considered that there is no reasonable alternative approach.

Advice for Small-scale Developments

The advice for Small-scale Developments section should not be read or applied in isolation.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.	Ensure any updates to procedure are included in future version of the SG	THC	Ongoing.
2	+	+	+	Indirectly this section could have a positive impact on this SEA Objective through indirect benefits to local communities.			
3	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.			
4	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.			
5	+	+	+	This section could have positive impacts on this SEA Objective by helping local communities provide sustainable local energy.			
6	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.			
7	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.			

8	=	=	=	It is unlikely that the advice for Small-scale Developments section will have any direct effect on this SEA Objective.			

Commentary: The Advice for Small Scale Developments section provides further advice for small scale development. It is anticipated that it will have a mostly neutral effect on the SEA Objectives but that there would be positive effects on SEA Objectives 2 (human health) and 5 (climate change).

Advice for Small-scale Developments: Alternative

Use the 'Key Development Plan Considerations' section to guide all development.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
2	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
3	**=**	**=**	**=**	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
4	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
5	-	-	-	Not including information that has potential to support smaller-scale or community-led developments may decrease the renewable energy generating potential.			
6	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
7	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			
8	=	=	=	It is unlikely that using this alternative approach would offer additional positive or negative benefits.			

Commentary: The alternative approach to Advice for Small Scale Developments, which is not have any additional guidance for small scale developments, would have a mostly neutral impact on the SEA Objectives however it is anticipated that there could be a negative impact on SEA Objective 5 (climate change).

Further Technical Information

The further technical information section should not be read or applied in isolation.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	=	=	=	It is unlikely that the further information for all stakeholders section will have any direct effect on this SEA Objective.	Ensure any updates to procedure are included in future version of the SG	THC	Ongoing.
2	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			
3	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			
4	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			
5	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			
6	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			

7	=	=	=	It is unlikely that the further technical information section will have any direct effect on this SEA Objective.			
8	=	=	=	It is unlikely that further technical information section will have any direct effect on this SEA Objective.			

Commentary: The majority of the further technical information section contains advice on planning process and information requirements to accompany planning applications. This material has not been included in the assessment. Only the text on Community Renewable Energy Developments is subject of this assessment. It is anticipated that there could be positive effects on SEA Objectives 2 (human health) and 5 (climate change).

Further Technical Information: Alternative

No reasonable alternative is identified

Commentary:
It is considered that there is no reasonable alternative approach.

Cumulative Assessment

It is assumed that the Draft Supplementary Guidance will be read alongside HwLDP.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	+	+	+	The key development plan considerations section provides a fuller interpretation of how important features and assets safeguarded through policies in HwLDP are expected to be safeguarded in relation to wind energy development.	Ensure HwLDP2 policies continue to cover all these topics [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]	THC	Preparation of HwLDP2 ongoing
2	+	+	+	The key development plan considerations section provides a fuller interpretation of how tourism and recreation interests are expected to be safeguarded in relation to wind energy development.			
3	+/-	+/-	+/-	Peat is covered in the key development plan considerations section however there is still potential for some peat loss.			
4	+	+	+	The key development plan considerations section provides information on the water environment.			

5	+	+	+	It is not directly having an impact on climate change or ensuring there are more renewable energy developments. However, indirectly it is ensuring that wind energy developments are not developed on areas of deep peat and it is helping to ensure that renewable energy is located where it is appropriate for it to be located.			
6	+	+	+	The Draft SG has the potential to influence where access tracks and other infrastructure is located.			
7	+	+	+	The Draft SG aims to ensure that developments do not have unnecessary impacts on the site, context or setting of historic environment assets and that mitigation is provided where necessary			
8	+	+	+	The Draft SG is trying to ensure that wind energy developments are located in appropriate places with appropriate mitigation and that landscape has been considered. It also sets out how Wild Land Areas will be considered in a wind energy proposal.			

Commentary: It is anticipated that on a cumulative basis, the draft Supplementary Guidance as a whole, would have a positive environmental effect on all of the SEA Objectives apart from Objective 3 (soil). [NB. Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans).]

Cumulative Assessment: Alternative

Use the 'Key Development Plan Considerations' section to guide all development.

SEA Objective	Timescale			Justification and Assumptions	Mitigation		
	Short Term (0-5 yrs)	Medium Term (5-10 yrs)	Long Term (10+ Yrs)		Measure	Lead Authority	Proposed Timescale
1	+	-	-	The Spatial Framework provides appropriate levels of protection to different features.			
2	+	+	+	The development guidelines section provides information on other considerations which need to taken into account of, including human health, when determining a planning application.			
3	+	+	+	The additional guidelines section covers soil.			
4	=	=	=	There will be a neutral impact on the water environment from this alternative.			
5	+	+	+	This will provide opportunity to significantly increase the proportion of energy from renewable sources.			
6	+/-	+/-	+/-	Development of windfarms has the potential to provide new or enhanced opportunities to access the outdoors.			
7	+	-	-	The spatial framework provides protection for historic environment features.			

8	+	-	-	The spatial framework provides protection for areas of high landscape and visual sensitivity.			

Commentary: Overall it is anticipated that by continuing to rely on the interim Supplementary Guidance, there would be positive environmental effects for the environment against SEA Objectives 1, 2, 3, 5, 7 and 8, in the short term. However as the spatial framework used in it is now out of date, not aligning with SPP, 2014, once HwLDP2 is adopted with the 2014 SPP spatial framework, the interim SG would be superseded. The Council would then be left in a position where there would be no Supplementary Guidance to support the HwLDP2 policy. This could potentially lead to negative environmental effects in the medium to long term.

Appendix 4 – THC Response to Comments on Revised Environmental Report (2015)

SNH

Comment	THC Response
The report provides a comprehensive assessment of the potential environmental impacts relating to the Supplementary Guidance and overall we are satisfied with the level of assessment.	Noted.
The Monitoring Table on page 33 currently suggests that SNH will be responsible for monitoring the *"Number of onshore wind energy developments permitted on areas of CPP – confirming schemes are actually in areas of CPP by reviewing ESs for proposals."* We agree it would be useful to monitor this and also to record the area of CPP lost to development. However this is a role for THC, not SNH. We would of course be happy to provide advice in relation to this, should there be any dubiety over the extent of CPP affected by a particular development.	Noted. However, the monitoring framework has been revised in the finalised Environmental Report to indicate that the Council will undertake a trial monitoring exercise involving a sample of wind energy proposals which will be looked at in some detail with regard to the planning issues raised and how they have been assessed and considered in the context of application of the Supplementary Guidance. The sample of proposals will include a range of types, sizes and locations. This will be a focussed quantitative and qualitative assessment. The SEA Consultation Authorities may be asked to provide advice to assist the exercise. The trial will feed in to an initial report to be prepared by the Council, scheduled for August 2017, reflecting on how effective the Supplementary Guidance had been. The Council will then reflect on the value and effectiveness of the trial method as a means of monitoring and consider whether to continue, amend or replace it and whether to continue or amend the sample size or include all proposals going forward, having regard to resource issues.
We note your reference to the need for Habitats Appraisal as part of the overall process in both preparing this Supplementary Guidance and we look forward to working with you in undertaking this appraisal process.	Habitats Regulations Appraisal has subsequently been completed and signed off by SNH prior to adoption of the finalised SG.

Historic Environment Scotland

Comment	THC Response
The environmental report clearly sets out the approach to assessment and identifies an appropriate baseline for the historic environment. We are generally content to agree with the findings of the assessment and would offer the following comments.	Noted.
In terms of monitoring the effects of the guidance we note that the proposed monitoring framework for the historic environment is based on Buildings at Risk numbers. We would note that the Buildings at Risk Register is no longer maintained by the Scottish Civic Trust but by Historic Environment Scotland. However, it should be noted that this proposed approach to monitoring the effects of the guidance is unlikely to provide meaningful information regarding its performance. In our response the environmental report for the Interim Onshore Wind Energy Supplementary Guidance we suggested that "Monitoring	Noted. However, the monitoring framework has been revised in the finalised Environmental Report to indicate that the Council will undertake a trial monitoring exercise involving a sample of wind energy proposals which will be looked at in some detail with regard to the planning issues raised and how they have been assessed and considered in the context of application of the Supplementary Guidance. The sample of proposals will include a range of types, sizes and locations. This will be a focussed quantitative

is a useful tool in gauging the success of any strategy and any unforeseen effects. The performance of this guidance could be measured against such information as the number of applications that have been granted permission where there are significant effects on the historic environment." This monitoring approach could also consider the overall performance of the mitigation of significant effects on the historic environment. We would advise that such an approach is considered when finalising the monitoring framework for the Post Adoption Statement.	and qualitative assessment. The SEA Consultation Authorities may be asked to provide advice to assist the exercise. The trial will feed in to an initial report to be prepared by the Council, scheduled for August 2017, reflecting on how effective the Supplementary Guidance had been. The Council will then reflect on the value and effectiveness of the trial method as a means of monitoring and consider whether to continue, amend or replace it and whether to continue or amend the sample size or include all proposals going forward, having regard to resource issues.

SEPA

Comment	**THC Response**
We note that a very similar approach was taken to the assessment to that which was carried out previously and insofar as it is still relevant we have used our previous ER consultation response to consider the adequacy of this new ER.	Noted.
We are generally content with the assessments presented. For example, we agree that the key development considerations are likely to have mixed impacts in relation to SEA objective 3 (soils) and, as outlined in our separate response to the guidance itself, suggest this means that amendments should be made to improve its environmental performance.	Amendments have been made in the finalised SG to improve its environmental performance in respect of SEA objective 3 (soils) – see paragraphs 4.34 and 4.35 (Peat) and 4.60 and 4.61 (Construction Environmental Management Plans). The inclusion of this additional mitigation is noted in the Finalised Environmental Report under the assessment of Key Development Plan Considerations and under the Cumulative assessment.
As outlined in our previous response we appreciate that it can be difficult to find monitoring indicators which are meaningful. We consider that the list put forward now is an improvement on what was included in the last ER, however, we still consider that a focused qualitative assessment of a defined number of planning applications may provide more useful information and in this regard, and in relation to the limitations of our water body classification, we refer you to the advice our previous response.	Noted. However, the monitoring framework has been revised in the finalised Environmental Report to indicate that the Council will undertake a trial monitoring exercise involving a sample of wind energy proposals which will be looked at in some detail with regard to the planning issues raised and how they have been assessed and considered in the context of application of the Supplementary Guidance. The sample of proposals will include a range of types, sizes and locations. This will be a focussed quantitative and qualitative assessment. The SEA Consultation Authorities may be asked to provide advice to assist the exercise. The trial will feed in to an initial report to be prepared by the Council, scheduled for August 2017, reflecting on how effective the Supplementary Guidance had been. The Council will then reflect on the value and effectiveness of the trial method as a means of monitoring and consider whether to continue, amend or replace it and whether to continue or amend the sample size or include all proposals going forward, having regard to resource issues.
We have no other specific comments to make in this case.	Noted.
As the guidance 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 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"	Noted. The Revised Environmental Report and comments on it have been taken into consideration in finalising the SG. The Finalised Environmental Report and SEA Post-Adoption Statement have been prepared.

similar to that advocated in the Scottish Government SEA Guidance. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.	


The Highland
Council
Comhairle na
Gàidhealtachd