

West Highland and Islands Local Development Plan

Strategic Environmental Assessment – Environmental Report

Appendix 1 - Responses to Consultation Authorities Comments to Scoping Report

Historic Scotland

Comment	Response
Scope of assessment and level of detail	
<p>My understanding is that the West Highlands and Islands Local Development Plan will replace elements of the existing local plan framework covered by the area in question. I also understand the main policy framework will remain that of the Highland-wide Local Development Plan.</p>	
<p>The scoping report provides a clear description of the approach to the assessment and I am content with the scope and level of detail proposed for the SEA. I note and welcome that the historic environment is to be scoped into the assessment and offer further comment in an annex to this response.</p>	
Consultation period for the Environmental Report	
<p>I note that it is proposed that the Main Issues Report and its environmental report be out for a consultation of a minimum of 8 weeks. I can confirm that I am content with the consultation period proposed.</p>	
Assessment Methodology	
<p>The approach to the assessment is clearly set out and in line with the assessment you have previously carried out across the suite of local development plans in Highland.</p>	
Appendix A – Relevant Legislation, PPS and Environmental Objectives	
<p>To note that also relevant here would be Our Place in Time – The Historic Environment Strategy for Scotland. This sets out a 1- year vision for Scotland’s historic environment and how its cultural, social and economic value contributes to the nation and its people. The strategy can be found at http://www.gov.scot/Resource/0044/00445046.pdf.</p>	<p>Noted and included.</p>
Appendix C(ii) – Site Assessment Matrix	
<p>The opportunity to comment on alterations to the site assessment matrix in the drafting of the methodology is greatly welcomed and subsequently I have no further detailed comments to offer in addition to those supplied previously</p>	

Scottish Environment Protection Agency

Comment	Response
The Environment	
<p>We suggest that information on waste generation and management is added into the</p>	<p>Noted and included.</p>

Material Assets section of Appendix B. Advice for sources of data on waste can be found in our Standard Advice on Scoping which is available from www.sepa.org.uk/media/147606/advice-for-responsible-authorities-on-sea.pdf.

Scope of Assessment

We agree that the air quality in the Plan area is generally good. However as per our response to you of 23 February 2015 our initial view is that this Plan could have significant effects on local air quality and as a result we recommended that Air should be scoped into the assessment. We consider that significant effects are most likely in the Fort William area as this is a relatively industrial town, with a number of existing businesses having air stack discharges, and it has a relative concentration of traffic. The 2013 Air Quality Progress Report (most recent one on the Councils website - you may have access to a more up to date version) suggests that while local air quality is still good in this area some aspects are potentially declining and it identifies a small number of biomass developments in Fort William which may impact on air quality and have not yet been taken into consideration. In addition the current Plan includes a number of yet to be realised business allocations (which could result in additional air discharges) and significant mixed use and housing allocations (which could result in additional traffic) and it is presumed that the call for site could result in additional sites being brought forward as well.

However, we do accept that as a Council you are in a better informed position than us to determine whether the proposals are likely to have significant effects on local air quality and as long as you have discussed the proposals with your own air quality specialists and they have advised that the Plan is unlikely to have significant effects on local air quality in Fort William (and anywhere else) we are content with what is proposed. We would however welcome the opportunity to discuss this with you further to understand how you came to this decision.

In agreement that Air Quality is an important consideration within the Plan Area, particularly at Fort William. Air Quality has now been scoped into our environmental assessment as part of the Environmental Report.

Alternatives and proposed level of detail

We highlight that all development sites which are potentially being considered for inclusion in the new Plan should be considered as

Noted. This policy alternative is mentioned in the Assessment Approach and Methodology section under Alternatives. It suggests this option will

reasonable alternatives.

We suggest that in this case where you have an already adopted Plan then one of reasonable policy alternatives in each case will be not to change from the current position.

We also highlight that if you propose to develop any new supplementary guidance at the same time as the new Plan and it is proposed that the guidance will be assessed at the same time as the related policy then this need to be explicitly clear in the ER. If not SEA screening reports are required for each new supplementary guidance publication.

not be considered reasonable as the existing Local Plans are outdated and many of the proposals do not fit within the current context of the area nor were subject to the same level of environmental assessment.

Noted and included within the Environmental Report.

Methods

We are content with the SEA objectives and the proposed policy assessment matrix.

We are generally very supportive of the approach your Council has taken to assessing sites, which tends to be thorough and well set out. However there were elements of the CASPLAN assessment which were not transparent and where the standard answers generated by the computer system you used where not directly relevant to the questions asked. Some frustration was expressed that we did not made this clear at an early stage and it did result in the need for considerably more effort on your team's part to provide free text, which did help, but was not fully successful. We are therefore disappointed to note that nearly all the detailed comments we made on the draft Site Assessment Matrix in our response to you of 23 February 2015 have not been acted upon. We would like to meet to discuss this issue further to understand the reason for this decision and to try and work with you to ensure that the overall assessment is as easy to understand and useful as possible.

Noted. We have altered the standard answers to be more relevant to the questions. We have also adopted a more flexible approach of altering the answer text on a case by case basis to provide a more accurate and transparent assessment.

Consultation period

We are satisfied with the proposal for an eight week consultation period for the ER and a six week consultation period for the revised ER.

Outcomes of scoping exercise

We would find it helpful if the ER included a summary of the scoping outcomes and how comments from the Consultation Authorities

Noted and included.

were taken into account.

Scottish Natural Heritage

Comment	Response
Scope of assessment and level of detail	
<p>Subject to the specific comments set out below and in the annex to this letter, we are content with the scope and level of detail proposed for the Environmental Report. We would commend you for the use of the model template for a combined SEA and site bid assessment matrix. First employed for the SEA of the Caithness and Sutherland LDP (CaSPlan), you have refined this in the light of experience to use also for WHILDP. We have been pleased to provide some informal input to this. A challenge will be to report the outcomes in a succinct way, given the number of assessment questions per site. We welcome the ability of the matrix to conduct early work on Habitats Regulations Appraisal.</p>	<p>Noted.</p>
<p>As another general point, we would encourage fuller consideration of the marine environment, particularly given the nature of the plan area. There are for example four Nature Conservation Marine Protected Areas abutting the coastline of West Highland and Islands.</p>	<p>Noted and included.</p>
<p>We have noted that there is no discussion of existing environmental problems or of monitoring in the scoping report. These will of course need to be included in the Environmental Report. We would be pleased to discuss natural heritage factors with you further in this context as you progress work on the Main Issues Report and the Environmental Report.</p>	<p>Noted and included within the Environmental Report.</p>
Consultation period for the Environmental Report	
<p>We note that a period of eight weeks is proposed for consultation on the Environmental Report (alongside the Main Issues Report) and we are content with this proposed period.</p>	
Detailed comments on West Highland and Islands Local Development Plan SEA Scoping Report	
<p>Page 5, para 3.2 (Table) – Nature Conservation Marine Protected Areas (NCMPA) should be added. There are four in the marine area of the plan area –</p> <ul style="list-style-type: none">• Wester Ross	<p>Noted and included.</p>

- Lochs Duich, Long and Alsh
- Small Isles
- Loch Sunart to the Sound of Jura

Page 6-7 Population and Human Health – some more consideration could be given to the comparative level of access to greenspace and outdoor exercise. Data may be available for this purpose in the Scottish Household Survey 2012 Annual Report – Local Authority tables - see - http://www.gov.scot/Topics/Statistics/16002/LATables2012 . Our report “Attitudes to Greenspace in Scotland” (2014) may also be of assistance in considering the human health and wellbeing benefits of access to greenspace - http://www.snh.gov.uk/docs/A1413382.pdf	Noted and included within Environmental Report.
Page 7 Soil – we consider this should be broadened to include geodiversity (there is mention here already of the Geoparks). Mention can be made of the numerous geological SSSIs in the plan area. In addition there are un-notified Geological Conservation Review (GCR) sites.	Noted and referenced within Environmental Report.
Page 8 Water – in terms of baseline and hydro-power, mention could also be made of schemes that serve the Alcan works, taking in Lochs Treig, Eilde Mor and the Blackwater Reservoir.	Noted and referenced within Environmental Report.
Page 9-10 Material Assets – with access being considered here, reference should also be made to core paths, long distance routes and the National Cycle Network.	Noted and included within Environmental Report.
Page 11 Landscape – another factor that could be considered here (and later) is unspoiled coast (SPP paras 89-91). Baseline data may be available from the Highland Coastal Strategy (isolated coast).	Noted and referenced within Environmental Report.
Page 15, SEA Considerations – under ‘Biodiversity, flora and fauna’ we suggest reference is made to trees and woodland, rather than trees and forestry. In addition you might consider adding ‘priority habitats’ to allow for significant non-designated habitats (beyond woodland) e.g. peatland. Both marine as well as terrestrial features should be considered (e.g. Marine Protected Areas, Priority Marine Features, designated seal haul-out sites).	Noted and referenced within Environmental Report.
Page 16, SEA Considerations – under ‘Climatic factors’ you might add carbon sinks and stores, which as well as carbon-rich soil would include forestry and woodlands.	Noted and referenced within Environmental Report.
Page 16, SEA Considerations – under ‘Water’ can be added reference to the inshore marine environment.	Noted and referenced within Environmental Report
Page 16, SEA Considerations – under ‘Landscape’ as noted above we suggest adding unspoiled coast.	Noted and included within Environmental Report.
Page 19, Appendix A – under ‘Biodiversity, flora and fauna’ in regard to the Scottish Biodiversity Strategy should be added reference to the ‘2020 Challenge for Scotland’s	Noted and included within Environmental Report.

<p>Biodiversity' (2013) http://www.gov.scot/Resource/0042/00425276.pdf. Also there are Draft SAC Management Schemes for Sunart and for Lochs Duich, Long and Alsh. As well as the Highland Biodiversity Action Plan, reference should be made to the relevant LBAPs.</p>	
<p>Page 21, Appendix A – under 'Water' in regard to the Marine (Scotland) Act 2010 should be added reference to the Draft Scottish National Marine Plan, as well in future to Regional Marine Plans. You may wish to refer here (and/or elsewhere) to Marine Protected Areas, Priority Marine Features and designated seal haul-out sites.</p>	<p>Noted and reference within Finalised ER.</p>
<p>Page 22-23, Appendix A – under 'Landscape' as noted above we suggest adding reference to the Highland Coastal Strategy in the context of the identification of unspoiled/isolated coast. In addition reference can be made to the emerging Ben Nevis and Glen Coe National Scenic Area Management Strategy. Wild Land Area Descriptions Reports will also in due course be available.</p>	<p>Noted and referenced within the Environmental Report.</p>
<p>Page 22, Appendix A – under 'Other relevant PPS' in regard to Highland wide LDP and Supplementary Guidance, you could add reference to the policy framework these provide to identify, protect and enhance green networks in the plan area.</p>	<p>Noted and referenced within Environmental Report</p>
<p>Page 25, Appendix B – under 'Biodiversity, flora and fauna' is listed Wild Land Areas, which should be deleted from here (these are included under Landscape), while under 'Landscape' as noted above we suggest Unspoiled Coast is added.</p>	<p>Noted for referenced within Environmental Report</p>
<p>Appendix C (ii) Site Assessment Matrix</p>	
<p>Page 11, 5b – we assume (as for 5a and others) that 'O' should refer to the nature, scale or location of the proposal, so that 'X-N/A' can then be omitted.</p>	<p>Noted and omitted.</p>
<p>Page 15, 5e – for the above reason, it would appear that 'X-N/A' can be omitted here.</p>	<p>Noted and omitted.</p>
<p>Page 31, 11c – re this question on greenfield sites, the text for a '++' score is 'Proposal will enhance the geodiversity of greenfield land'. We are not sure why geodiversity is specifically mentioned here, and would suggest that a more general benefit, to say "amenity" or "natural features" would be more appropriate here.</p>	<p>Noted and changed.</p>
<p>Other Comments</p>	
<p>We note there are no sections in this scoping report on –</p> <ul style="list-style-type: none"> • Existing environmental problems relevant to the plan • Monitoring <p>These will need to be included in the Environmental Report. We would be happy to discuss these with you further.</p>	<p>Noted and included within Environmental Report.</p>