

## Appendix 1 – How responses received on the Scoping Report have been taken into account

### Historic Scotland

Comment	Response
<p><b>Scope of assessment and level of detail</b>  Welcome approach outlined in this section noting that policy and development proposals from the previously adopted local plans will be reassessed.</p> <p>Recognition of the distinctive qualities of the area’s historic environment is also welcomed.</p> <p>Agree with decision to scope historic environment into the assessment.</p>	<p>Noted.</p>
<p><b>SEA Objectives</b>  As the area covered by the development plan contains the Inventory Historic Battlefield of Carbisdale, battlefields should be added to the SEA Considerations against which the environmental effects of the plan will be assessed. It should be noted that enhancement of certain types of historic environment sites is not always the preferred solution, most notable with scheduled monuments. Therefore suggest rewording the objective to “Protect and enhance, where appropriate, the area’s rich historic environment.”</p>	<p>SEA Objective has been reworded as suggested.</p> <p>There is a question in the site assessment matrix which asks about battlefields.</p>
<p><b>Assessment Methodology</b>  In considering the two-stage assessment process outlined any decisions made regarding the sifting of policies and land allocations before entering the second stage of assessment should be made explicit in the Environmental Report.</p>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>
<p><b>Monitoring</b>  The mitigation measures identified and required within the</p>	<p>Noted.</p>

assessment should drive the monitoring indicators and should be borne in mind as the assessment progresses.	
<b>Appendix B – Environmental Baseline Data</b> Add Historic Battlefields to baseline data for historic environment.	Added
<b>Appendix C Proposed Assessment Matrices</b> Welcome the list of questions provided for the historic environment to be used in analysing the spatial strategy. However add the phrase “and their setting” to the end of each question in order to ensure that both development affecting the site and setting of historic environment resources is considered.	The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.
<b>Consultation Period</b> Content with the 12 week consultation period stated in the Scoping Report.	Noted

## Scottish Environment Protection Agency

Comment	Response
<b>General Comments</b>	
Generally, the scoping report provides clear and detailed information on the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage. Subject to the comments below, we are generally content with the scope and level of detail proposed for the ER.	Noted
<b>Environmental information</b>	
Recognised that at present Appendix B currently only identifies 'main baseline data', further baseline information requirements which should help inform the assessment are made below:  In the soil section it is request that baseline information is specifically required on high carbon soils such as peat. As outlined elsewhere in the Report the plan area includes the Flow Country, the largest expanse of blanket bog in Europe, and many other parts of Sutherland at least, have peaty soils. The website <a href="http://www.seaguidance.org.uk">www.seaguidance.org.uk</a> provides baseline information on soil	Noted – further baseline data will be provided in the final document.  Noted – Baseline information will be provided on carbon rich soils where appropriate. Information on soil is provided in the current state of the environment section.
The material assets section requires information on waste generation and management. SEPA's waste data information is available from <a href="http://www.sepa.org.uk/waste/waste_data.aspx">www.sepa.org.uk/waste/waste_data.aspx</a> . To assist we also produce Waste Infrastructure Maps annually, which show all operational waste management facilities in each Local Authority area. These are available from <a href="http://www.sepa.org.uk/waste/waste_infrastructure_maps/local_authority_maps.aspx">www.sepa.org.uk/waste/waste_infrastructure_maps/local_authority_maps.aspx</a> . Waste baseline data should also include the <i>Zero Waste Plan 2010</i> , in particular the revised Annex B (published February 2011) which provides data relating to additional waste management capacity required in The Highland Council area.	Noted – Information on waste generation and management will be provided in the material assets section of the current state of the environment chapter.
In relation to flood risk then we would expect the process to be informed and supported by a strategic overview of flood risk management issues, presented	Noted – where appropriate, a strategic flood risk assessment will guide and inform any flood risk assessments.

<p>in the form of a Strategic Flood Risk Assessment (SFRA). Our relatively new <i>Strategic Flood Risk Assessment - SEPA technical guidance to support Development Planning</i>, which should be followed, is available from <a href="http://www.sepa.org.uk/planning/flood_risk/policies_and_guidance.aspx">www.sepa.org.uk/planning/flood_risk/policies_and_guidance.aspx</a>. Our <i>Land Use Vulnerability Guidance</i>, which is also available from the same webpage, provides our advice on the vulnerability of different types of developments and this may be helpful to you when considering any human health impacts from flood risk.</p>	
<p>No information is provided on climatic factors. <i>Consideration of Climatic Factors within Strategic Environmental Assessment (SEA)</i> provides guidance on this issue (available from <a href="http://www.scotland.gov.uk/Publications/2010/03/18102927/0">www.scotland.gov.uk/Publications/2010/03/18102927/0</a>). The Scottish Climate Change Impacts Partnership (SCCIP) website (<a href="http://www.sccip.org.uk">www.sccip.org.uk</a>) also offers free access to data on climate trends and their impacts on Scotland which might be helpful. When considering the effects of climate change on flood risk the most recent climate change information for the UK as a whole is the <i>United Kingdom Climate Change Impact 2009 (UKCIP09)</i> study. This study produced four scenarios (ranging from 'Low Emissions' to 'High Emissions') of climate change, based upon different projected inputs of greenhouse gasses to the atmosphere over the course of the 21st Century. Further information can be found at <a href="http://www.ukcip.org.uk/">www.ukcip.org.uk/</a>.</p>	<p>Noted. Discussion about climate change is included in the current state of the environment section.</p>
<p><b>Scope of assessment</b></p>	
<p>Satisfied with scoping in all environmental receptors.</p> <p>However, applying a proportionate approach, we consider that there is the opportunity to scope the Air receptor out of at least some of the assessments. The policy context for air quality has already been set by the Highland Wide Local Development Plan and this plan, we understand, will concentrate on allocations or localised policy. As outlined in your Report local air quality is very good and unless you propose, for example, to allocate very large scale industrial developments or propose new remote settlements we do not foresee the need to consider air quality in your assessments of the allocations.</p>	<p>Noted.</p> <p>Noted – It is not anticipated that air quality is a major issue in the plan area. For this reason we will provide data in the environmental baseline data section but will scope it out of the assessments.</p>
<p>We are satisfied with the approach that the related Supplementary Guidance</p>	<p>Noted.</p>

<p>(which will need to be consulted upon at the same time) will be considered within the relevant assessment of the Local Development Plan itself. It would be very helpful if, where this applies; the assessments are marked to make it clear that they also consider the related Supplementary Guidance.</p>	
<p><b>Alternatives</b></p>	
<p>Satisfied by the approach whereby at least one alternative to each main issue will be assessed.</p> <p>It is expected that all allocations that are reasonably being considered for inclusion in the new plan to be assessed. For the avoidance of doubt this should include those sites been brought forward from current plans (if they have not been assessed previously). If the Portfolio of Sites is already adopted as Supplementary Guidance at this stage then this work should be referred to.</p>	<p>Noted.</p> <p>We have assessed all reasonable sites that came in through the Call for Sites and Ideas exercise, the Wick and Thurso Charrettes, the North Highland Onshore Vision Call for Sites exercise and the existing sites in the Caithness and Sutherland Local Plans. Even sites that were assessed through SEA for the Sutherland Local Plan have been reassessed as the assessment matrix has changed.</p>
<p><b>General comments of the methodology for assessment</b></p>	
<p>Appendix C, which includes the assessment matrices, is welcomed.</p> <p>It is noted that the proposal for a two-stage assessment and are supportive of your wish to take a proportionate approach. We are, however, not absolutely clear how the Stage 1 assessment will be carried out and what the likely consequences will be with respect to what elements of the MIR or Plan will then be subject to the more detailed Stage 2 assessment. For example, we would have concerns if all reasonable allocations were not subject to the Stage 2 assessment, however in relation to this we are reassured by the comment above the site assessment matrix which states that it will be used in the analysis of all potential site allocations. We would nonetheless welcome the opportunity to meet and discuss this further so that we can gain a better understanding of the proposals for the Plan itself and the assessment.</p> <p>In relation to the scoring systems proposed in Appendix C it is noted that when used previously for the Inner Moray Firth Local Development Plan it seemed that in practice "+" and "-" are used to indicate <i>minimal</i> impacts, rather than <i>no or minimal</i> impact as is outlined in the scoring system. Similarly in practice the</p>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p> <p>To assist with proportionate yet comprehensive site assessments, in some settlements, sites have been grouped for assessment purposes.</p> <p>For the policy assessment matrix the "-" has been changed to read "minimal negative impact" and the "+" has been changed to read minimal positive impact".</p>

<p>equals sign seemed to be used to identify no impacts. We suggest that the way the scoping system was used in the previous plan was perhaps better and you might want to change the description of your system to reflect this.</p> <p>When providing the assessment of effects please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered. We would also encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option. Proposals for enhancement would also be supported.</p>	<p>Noted.</p>
<p>Satisfied with your proposed vision, spatial strategy and policy assessment matrix and especially welcome the inclusion of a justifications and assumptions column and mitigation columns.</p>	<p>Noted.</p>
<p><b>Methodology for assessment for allocations</b></p>	
<p>Site assessment matrix looks comprehensive, which is very much welcomed. However, we do have some concerns regarding how easy it will be for you to use and how easy it will be for any reader to gain an understanding of the important issues or make comparisons between sites.</p> <p>We note that many of your questions will require a qualitative answer (for example to answer questions such as, <i>what</i> are the likely significant effects, <i>how</i> will it be affected.). We highlight that to carry out the assessment well it will therefore be necessary for you to provide a lot of text to answer each question. While a perfectly acceptable approach we highlight that this may make the resulting assessment very long and, as suggested above, may be difficult to identify significant issues or compare sites.</p> <p>We note that the comments column often outlines the further questions that will be used to consider the initial question. In cases where you currently have a qualitative question we suggest you consider replacing it with the more straightforward second set of targeted questions instead. Most of these questions can be answers well with simple "yes" or "no" answers or with</p>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>

relatively short text. We think this may help to make a shorter, yet still relevant and easy to follow, assessment.

We like the inclusion of a column showing what information was used to make the assessment. We are also supportive of the approach whereby you consider the allocation with and without mitigation. We will expect to see the relevant mitigation included in the proposed plan when we get to that stage.

### **Soils**

In relation to the fourth soils question on peatland, we query how you are differentiating between the extraction and disturbance of peat. Will any of the allocations specifically propose to extract peat - we presume not. We suggest it would be simpler to just ask "will the proposal be located on peatland?"

### **Water**

In relation to the first water question we suggest you consider amending to "Will the proposal directly impact on the water environment, including wetlands?" In relation to this, to avoid duplication, you may wish to consider removing specific reference to wetlands and watercourses from the third biodiversity, flora and fauna section question.

In relation to flood risk as outlined above we would expect you to carry a Strategic Flood Risk Assessment. This should assess the allocations against all available information on flood risk. The SEA assessment could simply refer to the detail within the Strategic Flood Risk Assessment via the single question "Does the SFRA show that the site is at risk from flooding?" For your information we would consider that allocations that have been determined to be potentially at risk of flooding should be recorded as having a significant negative effect in the pre-mitigation column. If mitigation, in line with Scottish Planning Policy, could be implemented then this could be reduced to minimal effect post-mitigation. Where only part of the site is thought to be at flood risk likely acceptable mitigation measures may include reducing the size of the site to remove the area at risk of flooding or requiring the development to be

supported by a site specific flood risk assessment.

In relation to possibility to connect to the public foul drainage and water system we ask that these questions be answered separately as they often result in different answers. For your information we would consider any significant allocations or groups of allocations in a similar area which do not connect to the public sewage system as having a significant negative effect against the water environment.

We suggest that you could perhaps remove the last water question on drainage. Impacts in relation to culverts etc would be captured by the question we suggest in section 5.6 above and (nearly) all types of developments will require SUDS so response to this aspect of the question is likely to be the same for all allocations.

#### **Air quality**

We consider that air quality can probably be scoped out of the assessment for allocations. Unless the allocation is large scale industrial then it is unlikely to have any significant effect on air quality. Similarly there are no Air Quality Management Areas within or near the Plan area and as far as we are aware there are no candidate sites.

#### **Climatic factors**

Developing assessment questions for climatic factors for allocations is challenging. We have agreed with a number of previously proposed climatic factor assessment questions at the scoping stage to find that in practice they are not very informative or helpful when used.

In relation to the plan-making process (rather than SEA directly) we ask that you use the question "will the proposal utilise any form of renewable energy" to prompt you try and identify specific requirements for renewable energy production or use and ensure these via developer requirements. If not our SEA



<p>experience of this type of question is that it is answered throughout the assessment (depending on the exact wording of the question) either confirming that there is the opportunity to make sure of renewable energy, but then not identifying what and ensuring that the proposal is carried forward into the Plan, or stating that there are no proposals to produce or make use of renewable energy. Neither response helps consider or compare alternative allocations.</p> <p>Our experience of the question "Can the proposal be set out in a way which would take into consideration climatic factors?" and other similar questions is that the answer is always "Yes it can". Using the word "will" rather than "can" would improve the usefulness of the question; information should then be provided on how this will be ensured (presumable via a developer requirement).</p> <p>We would welcome a question which related to whether the allocation is likely to be at risk of flooding when the effects of climate change are considered. We suggest that for this purpose this could be determined to be those sites currently identified to be at risk of flooding and those sites in a coastal location which are adjacent to areas of flood risk and at a similar height.</p> <p><b>Waste</b></p> <p>The waste question has similar issues to the climatic factors question outlined above in above. The opportunity for sustainable waste management will exist for all sites, but it is our experience that the opportunity is often not taken. We suggest that the question is rephrased to "will the proposal include a sustainable method of managing waste" or similar and as part of the plan-making process you use the question to prompt you to try and identify sustainable waste management solutions for the allocations and then ensure them via developer requirements.</p>	
<p><b>Next steps</b></p>	
<p>We are satisfied with the proposal for a 12 week consultation period for the ER. If helpful, we would be very happy to provide informal comment on any draft</p>	<p>Noted</p>

work before it is submitted.	

## Scottish Natural Heritage

Response	Comment
<b>Scope of assessment and level of detail</b>	
<p>We would commend you for a well laid out, clear and succinct scoping report which on the whole is comprehensive and well reasoned. There did not however appear to be sections relating to existing environmental problems or to monitoring. We have set out some suggestions with regard to the former in the annex. Initially there appeared to be some gaps in the SEA considerations set out (e.g. in relation to carbon rich soils, wild land, energy efficiency, active travel and locating development to reduce the need to travel), but these are listed in the site assessment matrix. We have noted however the need to add Isolated Coast to consideration under Landscape, informed by the Council's Coastal Development Strategy.</p> <p>The Council is proposing a 2-stage process whereby if a policy/allocation is judged very unlikely to have any significant positive or negative environmental impact, a full assessment will not be undertaken. However this overlooks the scope and role of SEA to improve the plan by considering if neutral or minor positive effects could be enhanced. Also this would still require the justification for screening elements of the plan out to be carefully recorded. Overall in the interests of transparency and to maximise the scope of the SEA to enhance the plan we suggest the proposed Stage 1 should be a 'coarse sieve' exercise.</p>	<p>Noted. Isolated coast has been added to the landscape section in table 3.</p> <p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>
<b>Consultation period for the Environmental Report</b>	
We note that it is proposed that there will be a 12 week consultation period for the Environmental Report at both the Main Issues Report and Proposed Plan stages, and we are content with this.	Noted
<b>The Plan – Relationship with other relevant strategies, plans and programmes</b>	
It would be helpful if the diagram of the hierarchy included Supplementary Guidance (SG). SG might influence the plan (i.e. those linked to the Highland wide LDP) or be influenced by the plan (i.e. any proposed SG of the C&SLDP itself). It is also important to establish the extent to which this SEA will seek to address any SG anticipated to be linked to this plan, or whether any such SG will	Noted – the diagram of the hierarchy has been amended to show the required information.

<p>be covered by separate SEA. PPS above the national level have not been considered in detail some care is needed in this regard because Schedule 3(5) of the Act includes the need for Environmental Reports to include 'the environmental protection objectives established at international level'. If less consideration is to be paid to international PPS it should be checked that they have indeed been translated into national PPS.</p>	
<p>Landscape is not listed in the set of bullet points on pp2- 3, but we note it is included in Appendix A.</p>	<p>Noted. Landscape is included in the SEA Objectives.</p>
<p><b>The environment (p4-5)</b></p>	
<p>This section provides some information on the environmental characteristics of the area, including the extensive coastline, the Flow Country and the geology. Distinctive landscape features are mentioned in relation to topography. In taking this forward to the Draft Environmental Report, we suggest other key environmental characteristics are:</p> <ul style="list-style-type: none"> <li>- This is an important area for the qualities of wildness to be present, and hence where key significant extensive areas of high wild land character are present. This is a particular strength for Sutherland. There are extensive Search Areas for Wild Land in Sutherland, and recent mapping work on wildness indicates the extent of Sutherland with a relatively strong sense of wildness.</li> <li>- The coastline (which is mentioned) is important for breeding seabirds, and much of the north and east coastline and the associated offshore environment is designated as Special Protection Area.</li> <li>- A significant proportion of the north and west coast is classified as Isolated Coast in the Council's Coastal Classification (Highland Coastal Development Strategy).</li> <li>- The extent of designated areas for this LDP is notable — for example according to the Council's figures on page 5 almost 45% of the plan area is designated as Special Area of Conservation/Special Protection Area.</li> </ul>	<p>Noted. Further information as appropriate is provided in the current state of the environment section of the Environmental Report.</p>

<p>We note the table on p5 providing data on designated areas in the plan area. It would be useful if this was accompanied by some information on the presence of protected species and important habitats in the plan area. Perhaps some general information could be provided from the relevant Local Biodiversity Action Plans. For other important habitats, peatland outwith designated areas should be recognised. An indication of their abundance and distribution across Caithness and Sutherland can be found in Map 1 of the 'Peatlands of Caithness and Sutherland Management Strategy 2005-2015' — <a href="http://www.snh.gov.uk/publications-data-and-research/publications/search-thecatalogue/publication-detail/?id=400">http://www.snh.gov.uk/publications-data-and-research/publications/search-thecatalogue/publication-detail/?id=400</a></p>	
<p><b>Appendix B</b></p> <p>This section of the scoping report provides no information on the Council's intended identification and consideration of any existing environmental problems which are relevant to the plan (Schedule 3(4)). We suggest the following should be highlighted in the Environmental Report and tested against the contents of the plan —</p> <ul style="list-style-type: none"> <li>- The attrition on wild land areas, especially from wind farms.</li> <li>- The environmental impacts of small scale wind turbines, especially cumulatively.</li> <li>- The environmental impacts of hydro schemes and associated infrastructure.</li> <li>- Integrity of peatland areas as a carbon sink and an important habitat.</li> <li>- Consideration of the terrestrial and the offshore environment in a coordinated way, such as providing for the onshore aspects of offshore renewables development.</li> <li>- Coastal erosion between the Dornoch Firth and Helmsdale.</li> <li>- Forestry plantation restructuring.</li> <li>- Forestry expansion arising from the Scottish Forest Strategy.</li> <li>- The strategic timber transport route.</li> <li>- Siting and design of housing in the countryside.</li> <li>- Vehicle tracks (bearing in mind no revision of the GPD.)</li> </ul>	<p>Noted – this information has been taken into account when preparing the Environmental Baseline data for the Environmental Report.</p>
<p><b>Scope of assessment (p6-7)</b></p>	

<p>We agree that for this LDP, all the environmental parameters in Schedule 3 of the Act should be scoped in. Under Soil, no mention is made of the carbon storage property of peat soils as another reason to scope this in. Under Population and Human Health, as well as Thurso and Wick regarding past and present industrial uses could we suggest be included Dounreay. This topic should also consider the opportunity for active travel. Under Landscape, another justification is the extent and significance of wild land in Sutherland, including the isolated coast.</p>	<p>Noted.</p> <p>Following further discussions with the Consultation Authorities, air quality has been scoped out.</p>
<p>We agree that development proposals brought forward from existing Local Plans should be assessed (especially given that the current Caithness Local Plan pre-dates SEA).</p>	<p>Noted. All existing sites from the Caithness and Sutherland Local Plans have been assessed, unless they have already been built out.</p>
<p>We also agree that where policies or proposals will form a `hook' from which later Supplementary Guidance will be produced; the scope of the SG should be assessed at this stage as part of this SEA.</p>	<p>Noted.</p>
<p><b>Methods – SEA objectives and considerations (p8-9)</b></p>	
<p>We assume that each of the SEA Considerations listed in this table will feed through to an assessment question in the Site (or Policy) Assessment Matrix. Gaps which appear here (but which in several instances are covered later in the example site assessment matrix) are:</p> <ul style="list-style-type: none"> <li>- Biodiversity, flora and fauna — important habitats, e.g. ancient, long-established and semi-natural woodland; peatland</li> <li>- Population and human health — opportunity for active travel</li> <li>- Soil — carbon rich soil</li> <li>- Climatic factors — energy efficiency of developments; use of renewable energy; reducing the need to travel; coastal processes</li> <li>- Material assets — core paths and other access opportunities; forestry.</li> <li>- Landscape — wild land and areas with strong qualities of wildness; isolated coast</li> </ul>	<p>The considerations listed correlate with questions in the assessment matrix. Gaps which have been listed are covered by assessment questions.</p>
<p><b>Appendix C:</b></p>	
<p><b>Assessment methodology (p9-10)</b></p>	
<p>We note the proposed 2-stage process whereby if a policy/allocation is very unlikely to have any significant positive or negative environmental impact, a full</p>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that</p>

<p>assessment will not be undertaken. However this overlooks the scope and role of SEA to improve the plan by considering if neutral or minor positive effects could be enhanced. Also it will be important that there is sufficient justification documented for elements of a plan that are 'screened out' of SEA assessment. Therefore the justification for any elements being so screened out should be documented in an appendix to the Environmental Report. Overall in the interests of transparency and to maximise the scope of the SEA to enhance the plan we suggest this proposed Stage 1 should be a 'coarse sieve' exercise.</p>	<p>CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p> <p>All policies/alternatives and all reasonable sites have been subject to assessment.</p>
<p><b>Monitoring</b></p>	
<p>We note there is no coverage of monitoring in this Scoping Report. A description of the measures envisaged concerning monitoring should be included in the Environmental Report (Schedule 3(9)). Indicators should be linked to the SEA Considerations.</p>	<p>Noted – The environmental report includes a section on monitoring.</p>
<p><b>Habitats Regulations Appraisal (p10-11)</b></p>	
<p>We welcome the intention to use the SEA for early consideration of any likely significant effects of policies and allocations on European sites. Please note that reference should be made to the 2012 version of the SNH Guidance (Version 2.0), not the 2010 version (Version 1.0).</p>	<p>Noted – Reference will be made to 2012 version of the SNH guidance (version 2.0) and not the 2010 version (Version 1.0).</p>
<p><b>Next steps (p11)</b></p>	
<p>We are content with the proposed 12 week period for consultation at both the draft (Main Issues Report) and revised (Proposed Plan) Environmental Report stages.</p> <p>We note the documents will be available for public view at the Council's offices in Inverness, but presume they would also be available for public inspection at the Council's offices in Golspie and Wick.</p>	<p>Noted.</p> <p>Copies of the document will be made available for public inspection at the Golspie and Wick council offices.</p>
<p><b>Appendix A – Relevant legislation, PPS and Environmental objectives (p12-15)</b></p>	
<ul style="list-style-type: none"> <li>- The EC Habitats Directive and the Habitats Regulations are relevant with regard to protected species (European Protected Species) as well as Natural sites.</li> <li>- As well as the Nature Conservation (Scotland) Act 2004 reference should</li> </ul>	<p>This section has been updated in the Environmental Report.</p>

<p>be made to the Wildlife and Countryside Act 1981 as amended and the Wildlife and Natural Environment (Scotland) Act 2011 with regard to protected species and the biodiversity duty.</p> <ul style="list-style-type: none"> <li>- For the Flow Country reference should be made to 'Peatlands of Caithness and Sutherland Management Strategy'.</li> <li>- A further entry is required to cover green networks. This could indicate the hierarchy from the Scottish Planning Policy to the Highland wide LDP to the Green Networks Supplementary Guidance.</li> </ul>	
<p>Population and human health: This should include the hierarchy of PPS that promote active travel, e.g. the Highland Local Transport Strategy and Active Travel Masterplans.</p>	<p>This section has been updated in the Environmental Report.</p>
<p>Landscape: A hierarchy of PPS can be indicated for isolated coast (Scottish Planning Policy to the Highland wide LDP to the Highland Coastal Development Strategy)</p>	<p>This section has been updated in the Environmental Report.</p>
<p>As well as the European Landscape Convention should be listed :</p> <ul style="list-style-type: none"> <li>- Countryside (Scotland) Act 1967</li> <li>- Caithness and Sutherland Landscape Character Assessment (1998)</li> <li>- Scotland's Scenic Heritage</li> <li>- Special Qualities Reports for National Scenic Areas</li> <li>- Citations for the Special Landscape Areas</li> <li>- Wildness in Scotland's Countryside Policy Statement</li> <li>- Wildness Qualities Mapping</li> <li>- Highland Coastal Classification (in Highland Coastal Development Strategy)</li> </ul>	<p>This section has been updated in the Environmental Report.</p>
<p>Other relevant PPS:</p> <ul style="list-style-type: none"> <li>- We suggest the N-RIP is very relevant for this plan</li> <li>- Highland Single (Outcome Agreement 2)</li> </ul>	<p>This section has been updated in the Environmental Report.</p>
<p><b>Appendix B – Environmental baseline data (p16-17)</b></p>	
<p>The list is so far limited to designated areas. The environmental baseline data should also consider other important habitats and species, and also the green network.</p> <ul style="list-style-type: none"> <li>- Presence of protected species may be able to be derived from the NBN</li> </ul>	<p>Where the data has been available to us, it has been included in the baseline data.</p>



<p>Gateway (<a href="http://data.nbn.org.uk/">http://data.nbn.org.uk/</a>) although absence of any record is not conclusive that the species is not present).</p> <ul style="list-style-type: none"> <li>- Ancient, semi-neutral and long established woodland is mapped on the inventory.</li> <li>- Peat soils are indicated on Map 1 of 'Peatlands of Caithness and Sutherland Management Strategy'. More detailed information would be available from the James Hutton Institute.</li> <li>- The Highland wide LDP provides for Green Networks in the corridors from the Dornoch Firth to Helmsdale and between Thurso and Wick. You may wish to discuss with us as work commences on the LDP how the existing important elements of the green network should be identified and mapped in these subareas.</li> </ul>	
<p>Population and human health:</p> <ul style="list-style-type: none"> <li>- Active travel audits are available for Thurso and Wick <a href="http://www.highland.gov.uk/yourenvironment/roadsandtransport/transportplanning/ActiveTravelMasterplans.htm">http://www.highland.gov.uk/yourenvironment/roadsandtransport/transportplanning/ActiveTravelMasterplans.htm</a></li> </ul>	<p>Where the data has been available to us, it has been included in the baseline data.</p>
<p>Soil:</p> <ul style="list-style-type: none"> <li>- The presence of carbon rich soil should be added here — again baseline material is mapped in the Management Strategy for the Caithness and Sutherland Peatlands, and more detailed data should be obtainable from JHI. Also see our Information Note on Carbon Rich Soils - <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-rocks-and-minerals/soils-and-development/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-rocks-and-minerals/soils-and-development/</a></li> <li>- Geodiversity sites should also be added under here — baseline data would include un-notified GCR and RIGS sites (Local Geodiversity Sites).</li> <li>- Baseline data for brownfield sites could be obtained from the Vacant and Derelict Land Survey.</li> </ul>	<p>Where the data has been available to us, it has been included in the baseline data.</p>
<p>Landscape:</p> <ul style="list-style-type: none"> <li>- Other environmental baseline data that should be listed and utilised are:</li> <li>- National scenic areas (including their special qualities)</li> <li>- Search areas for wild land (from the SNH policy statement)</li> <li>- Wildness qualities mapped information</li> </ul>	<p>Where the data has been available to us, it has been included in the baseline data.</p>

<ul style="list-style-type: none"> <li>- Highland coastal classifications (from Highland Council Development Strategy)</li> <li>- Sutherland landscape capacity study: an analysis of housing potential (2006).</li> </ul>	
<b>Appendix C – Proposed assessment matrices (p18-24)</b>	
<p>By and large this is a comprehensive matrix for assessment, which in places fills gaps in coverage noted elsewhere in the scoping report, e.g. under Climatic Factors and Soil.</p> <p>We suggest that the proposed “+” and “-“ scores should be minimal positive/negative impact as opposed to `no or minimal positive/negative impact'. This would then avoid confusion with the `= score which is `neutral impact'.</p> <p>The policy and site assessment matrices do not include cumulative effects. It is suggested a separate matrix will be necessary for this, relevant for example to landscape character areas, river systems and protected species.</p>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p> <p>For the policy assessment matrix the “+” and “-“scores have been amended to minimal.</p> <p>Cumulative effects have been assessed separately and the results are in the Environmental Report.</p>
<p>Biodiversity, flora and fauna – 3<sup>rd</sup> question.</p> <ul style="list-style-type: none"> <li>- As well as ancient and semi-natural woodland should be reference to long established woodland.</li> <li>- Peatland should be added in relation to its habitat value.</li> </ul>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>
<p>Population and human health.</p> <ul style="list-style-type: none"> <li>- We suggest another entry should be added here with regard to the promotion of active travel, eg. “Will the proposal create and/or link in to the path network for walking and cycling?”</li> </ul>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>
<p>Landscape</p> <ul style="list-style-type: none"> <li>- Will the proposal affect any designated landscape areas?</li> <li>- Will the proposal maintain or enhance the present landscape character of the area?</li> <li>- Will the proposal affect a search area for wild land or an area with a high quality of wildness?</li> <li>- Will the proposal affect the isolated coast?</li> </ul>	<p>The assessment matrix provided with the Scoping Report has been superseded following the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist.</p>

- Does the proposal accord with the landscape capacity of the area?

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