

Appendix 1b:

Following on from the agreement that CaSPlan would trial the SNH/HS/SEPA draft Site Assessment and SEA checklist, we produced a modified version and submitted a revised Scoping Report to the SEA Gateway in November 2013. The tables below relate to the responses we received to the revised Scoping Report and deal just with the site assessment and SEA checklist. Following on from the responses for this this that we received from the Consultation Authorities, various alterations were made to the draft matrix in consultation with the Consultation Authorities.

Historic Scotland

Welcome your intention to use the pro-forma checklist. In offering comments I am working on the understanding that a double minus/plus is seen as a significant effect and a single minus/plus as not significant.	Correct.
--Development of this site would lead to the loss or major alteration of key component of a cultural heritage designation or its setting – the phrase “complete alteration” is a little confusing. As currently drafted it would appear that significant adverse effects on the setting of cultural heritage features cannot be identified.	“--” Has been redrafted to read, “Development of site would lead to loss or major alteration of components of a cultural heritage designation or its setting”
-Development of this site would have a negative impact on features of a cultural heritage designation or its setting – negative impacts on “key features” of a cultural heritage designation are likely to be significant.	Noted. The word “minor” has been added.
+renovation/regeneration of historic buildings lying empty/at risk and /or development will enable better access to the historic environment and/or maintain the setting of cultural heritage features – development can be brought forward without altering important aspects of the setting of cultural heritage sites.	Text has been amended to reflect the suggested changes.
++Large-scale redevelopment and reuse of historic buildings/building from at risk register and /or enhance the setting of cultural heritage features and/or designation of a new conservation area or scheme of safeguarding – in some cases development can aid in the enhancement of degraded settings of cultural heritage features.	Noted.

Scottish Environment Protection Agency

We very much welcome the fact that you are trialling the SNH/HS/SEPA produced draft Site Assessment and SEA checklist, with some additional questions/modifications of your own. This should help ensure that the final version we release is a useful document.	Noted
I refer you to our previous scoping response in relation to comments on the scoping of “air”, about proportionality and in relation to the quantitative nature of your assessment – the fact that questions that start “to what extent” are more difficult to answer than questions that start “will the option...”.	Air has been scoped out of the assessment in agreement with the Consultation Authorities.
Site history and outside settlement boundary – good useful information.	Noted
In the “Comments” column - Suggest you add in again the column which explains how the information was gathered. Alternatively, if the question is always answered in the same way you could just provide a separate table that provides this information once (rather than it have to be repeated every time for each assessment)	Appendix 7 of the Environmental Report is a blank version of the site assessment matrix and the sources of information column is shown for each question.
Q1: “or may have an affect on the actions being carried out by the North Highland Area Advisory Group” – seems a reasonable addition.	Text added to question.
Q6 Climate change mitigation – how is this going to be scored?	Pre and post mitigation scoring has been added.
Q7 Flood risk – The new Q7 negates the need for Q 8, 9 and 10	Noted, flood risk is now just question 3a.
Could Q17 and 18 be combined (vehicle access constraints or opportunities and is the site close to a range of facilities)	Two separate questions remain.
Q23 (what level of work would be required to connect to a public water supply and waste drainage system) could be covered in Q20	Separate question on public water supply remains.
Q24 air quality - Do you really think that air quality is going to be a very significant issues for Caithness and Sutherland allocations? (At the scoping stage we suggested that it wouldn't be) Suggest opportunities exist to shorten and streamline this section. There are no existing air quality management areas in Caithness and Sutherland so this question is not relevant to the Plan - suggest you remove.	Air quality has been removed in agreement with the Consultation Authorities.

Q32 – just cover contamination in Q33	Question 32 (now 11a) now just covers brownfield land and not contamination.
Q36 – add “and other carbon rich soils”	Text added.

Scottish Natural Heritage

Q5 – maybe to be in line with the style of other questions this should be re-phrased to - ‘To what extent would the proposal affect groundwater abstractions?’ and then the accompanying text in the right hand column would set out the details of how this would be assessed (i.e. distance from roads, borrow pits etc). In this respect we suggest there should be more clarity on what is a ‘large scale proposal’ (a term not used for other assessment questions)	Question 5 is no longer a question.
Q6 – if the SPACE model simply provides a figure (e.g. CO2 output) a yardstick will need to be devised to assess this as positive or negative	The SPACE model was not used, instead yardsticks of sizes of developments were used to provide scores.
Q12a – we suggest that in order to integrate with the HRA of the plan, any likely significant effect on a Natura site should be assessed as - -, while a minor effect (i.e. an effect but not significant) should be assessed as – . This would help with the screening stage (alone or in combination) in HRA. Mitigation would have to be dovetailed between the SEA and HRA (see latest SG Advice Sheet on HRA and SEA)	Noted
Q12b – we suggest a - - score should be where there could be an effect on the integrity of the designated site or the qualities for which it is designated. This is especially important for any effect on a SSSI (which is a national designation) as opposed to a SLNCI or LNR (which are not). A – score would be for a negative effect that was not significant	Scoring text amended to reflect this.
Q12c – we suggest a - - score should include where there would be a loss of woodland that is included in the Ancient Woodland Inventory, given the strong presumption against loss of such woodland in the Control of Woodland Removal Policy and its accompanying guidance.	Scoring text amended to reflect this.

Another habitat to list here is blanket bog (i.e. Annex 1 habitats)	
Q12d – we suggest a - - score should be where it is likely that a protected species licence will need to be obtained to allow the development to proceed. A – score could be where protected species are likely to be present, but mitigation should be possible to avoid the need for a licence	Scoring text amended to reflect this.
Q21 – other ‘bad neighbours’ could be considered here as well as electricity pylons – e.g. quarries, pipelines, wind farms. Distance thresholds could be used to define - - and - effects	Question amended to reflect suggestion
Q28 – we suggest this is segregated into two questions to help answer the two different facets to this issue – Q28a – “To what extent will the proposal affect the quality of open space or result in a loss of open space?” Q28b – “To what extent is the proposal accessible to existing open space?” (distance thresholds could be used for this one, e.g. a site < 250m = ++, <500m = +, >500m = - - and >1000m = - -)	Amendments made to these questions following further discussion with SNH.
Q32 – this covers both contaminated and brownfield land, and we suggest these are segregated out, since different issues relate to each. In fact Q33 also covers contaminated land, so some rationalisation appears possible here, e.g. “To what extent does the proposal re-use brownfield land?”; “Are there contaminated land issues on the site, and if so will the proposal reduce contamination?”	Question now just covers brownfield land.
Q36 and 37 – again some rationalisation appears possible here, as both these consider carbon-rich soils / peat. We suggest Q36 considers carbon rich soils and Q37 considers prime agricultural land. However given the special nature of Caithness and Sutherland we suggest you will want to consider any effect on good quality croft land (e.g. in-bye). So we suggest Q37 should address both prime land and good quality croft land, i.e. Q36 = “To what extent will the proposal lead to a disturbance of carbon-rich soils (including peat) and hence their carbon storage properties?”; and Q37 = “To what extent will the proposal affect prime quality agricultural land or good quality croft land?”	Question 12a deals with carbon rich soils and question 12b deals with high quality agricultural soil or croft land, using text suggested.
Q42 – we suggest a - - score should be where there could be an effect on the integrity of the designated site or the qualities for which it is	Changes have been made to scoring text following further discussions with SNH.

<p>designated. This is especially important for any effect on a NSA (which is a national designation) as opposed to a SLA (which is not). A – score would be for a negative effect that was not significant. (NB there is a typo in the right hand column as this refers to designed landscapes rather than designated landscapes). We also suggest that at present the text in the RH column is only relevant for proposals affecting designated areas (i.e. NSA, SLA) and is not relevant for consideration of impact on landscape character more widely. So we suggest further accompanying text along the lines of “- - = The proposal is of a scale or nature that would be difficult to be accommodated within the particular landscape character type”; “ - = The proposal does not relate to the characteristics of the landscape in the area”; “+ = The proposal has been designed to blend in to the existing character of the landscape”; “+ + = The proposal enhances a degraded landscape character area”. It is unclear why there is a 0/X option here – we would have assumed these were two separate options (‘0’ = neutral and ‘X’ = not applicable, although the SEA issue of landscape should be applicable to all proposals)</p>	
<p>Q43 – we suggest wild land is made into a separate question, so that this question can focus on landscape character more generally. So a separate question Q43b would be along the lines of “To what extent will the proposal affect any area with strong qualities of wildness (including the isolated coast)?” with Q43a being “To what extent will the proposal affect features of landscape interest, including the distinctive character of the landscape?”</p>	<p>Question is now just about wildland. Landscape is dealt with on other questions.</p>
<p>Q44 – we suggest amending the question here to “To what extent is the proposal within the capacity of the landscape to accommodate it?” We suggest adding a supplementary question here along the lines of “To what extent would the proposal be visually intrusive” bearing in mind the criteria in the RH column here (NB however there is scope for rationalisation re landscape between Qs 43a and 44 as they are very duplicative)</p>	<p>Question 15a has been amended to reflect the suggested text and question 15b now asks “To what extent would the proposal be visually intrusive”.</p>
<p>Q51 – re World Heritage Sites a note should be added here in order that any impacts on the tentative Flow Country WHS is considered</p>	<p>Text added</p>
<p>How would a judgement be made across the totality of answers to</p>	<p>A discussion is included in the Environmental Report for each</p>

these questions as to whether a site is acceptable to carry forward as a preferred option in the MIR? Does that depend on suitable mitigation being included for identified significant negative effects?	settlement which highlights how SEA has influenced the decision over whether sites are preferred or non-preferred.
How will this assessment be used for sites that are already in the Adopted Local Plan or have an extant planning permission?	Existing sites in local plans and sites that have extant planning permission have all been assessed using the site assessment matrix.
Thought should be given to how the amount of time spent on completing this assessment for each bid site (and for publishing and reading the SEA in due course!) can be kept to a manageable level.	Noted.