

Post Adoption Strategic Environmental Assessment Statement: A96 Growth Corridor Framework

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POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

To: SEA.gateway@scotland.gsi.gov.uk

or

SEA Gateway
Scottish Executive
Area 1 H (Bridge)
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Edinburgh EH6 6QQ

PART 2

A post-adoption SEA statement is attached for the PPS entitled:

The A96 Corridor Growth Corridor Development Framework

The Responsible Authority is:

The Highland Council

PART 3

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Malcolm MacLeod3/09/2008

POST - ADOPTION SEA STATEMENT

Post-adoption SEA statement for:

The A96 Corridor Growth Corridor Development Framework

Adopted on:

26th September 2007

Responsible Authority:

The Highland Council

POST-ADOPTION SEA STATEMENT - INTRODUCTION

This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

POST-ADOPTION SEA STATEMENT AVAILABILITY OF DOCUMENTS

WEBSITE

The full PPS as adopted, along with the Environmental Report and post-adoption SEA Statement are available on the Responsible Authority's website at:

<http://www.highland.gov.uk/businessinformation/economicdevelopment/regeneration/a96-corridor-masterplan.htm>

OFFICE ADDRESS

The PPS, as adopted, along with the Environmental Report and post-adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principal office of the Responsible Authority:

Contact name, address and telephone number

Malcolm MacLeod,
Development Plans Manager,
Planning and Development Service,
The Highland Council HQ,
Glenurquhart Road,
Inverness,
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Telephone 01463702506.

Times at which the documents may be inspected or a copy obtained:

Monday to Friday 0900-1700.

POST-ADOPTION SEA STATEMENT - KEY FACTS

Name of Responsible Authority	The Highland Council
Title of PPS	The A96 Growth Corridor Development Framework
Purpose of PPS	Supplementary Planning Guidance

What prompted the PPS

The timetable for the production of the Highland Wide Local Plan meant that there would be no guidance on the A96 Corridor developments for some time. The Supplementary Guidance is intended to provide interim guidance until the completion of Highland Wide Local Plan.

Subject

Strategic Growth

Period covered

The document is to be used for developments post 2011 however the exact period of time is indeterminable as the document sets out development of strategic projects for the next thirty years.

Frequency of updates

Supplementary Planning Guidance will not be updated. Local Plans/ Local Development Plans, including policies on the A96 Development Framework Area will be reviewed as part of Development Plan Reviews.

Area of PPS

The framework covers the area along the A96 Corridor covers all of the land between Inverness and the border with Moray and south to the B9006.

Summary of nature/content of the Supplementary Planning Guidance Document

The A96 is a strategic corridor identified in the National Planning Framework as a sub-regional expansion area and offers potential for the continued growth of Inverness and the rest of the Highlands. The document forms supplementary planning guidance to the approved development plan for the area until the provisions set out in the document can be taken forward through the Highland Wide Local Plan. This work is due to commence once the new Development Plan regulations are in place in early 2009. As a result the Council looks forward to the pro-active engagement of the Consultation Authorities in bringing forward the revised Strategic Environmental Assessment process on the whole content of the Plan, which will contain substantial elements relating to the A96 Corridor.

The document sets out development frameworks for East Inverness, Nairn and also a supplementary green framework for the rural area between. The framework contains a protocol for developer contributions which sets out a consistent approach for the delivery of

contributions towards the major infrastructure required to deliver the proposals in the document.

Date adopted

26th September 2007

Contact name & job title

Address, email, telephone number

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Date 3/09/2008

POST-ADOPTION SEA STATEMENT - STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The A96 Growth Corridor Development Framework has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the A96 Corridor Framework and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the A96 Corridor;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the A96 Corridor Framework
- Committing to monitoring the significant environmental effects of the implementation of the A96 Corridor Framework. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

How environmental considerations have been integrated into the A96 Growth Corridor Development Framework and how the Environmental Report has been taken into account

This section of the report sets out how the environmental report has been taken into account in the final version of the A96 Corridor framework. In doing so, it

- list environmental problems identified in the Environmental Report and explain how these have been taken into account in the PPS;
- list negative effects identified in the Environmental Report and whether / how these have been dealt with in the PPS;
- list measures for prevention, reduction and offsetting of significant adverse effects identified in the Environmental Report plus any revised measures considered later and explain how these have been integrated into the PPS;
- list positive effects identified in the Environment Report and whether/how these have been integrated into the PPS.

Table 1 - How Environmental considerations have been integrated into the A9 Growth Corridor Development Framework

Issue	Integrated into A96 Corridor Framework?	How integrated/taken into account or reason for not being taken into account
Biodiversity, Flora and Fauna		
<p>Many habitats throughout Inverness & Nairn now exist only as isolated remnants of once larger areas of wetland, woodland or moorland. Wildlife often cannot move between these remnants, and so populations of some species become isolated and more vulnerable to changes in climate, disease and predation (habitat fragmentation). SNH comment that this makes it especially important to maintain and enhance the connectivity of natural and semi-natural habitats within the Corridor. Conflicts between different biodiversity interests exist; as there will be different issues in different locations, and legal restrictions on the control of some species. For example, European protected species – bats, otters, dolphins and porpoises, waterfowl and UK protected species – badgers, red squirrels, great crested newts.</p>	YES	<p>The Green Framework recognises the opportunity to establish new wildlife corridors to provide habitat networks and encourage biodiversity through appropriate linkages. In particular, three corridors have been identified at Mains of Balnagowan, Morayston and Newton. The urban frameworks for Nairn and Inverness also very deliberately identify clear separation between different elements of development. The work on setting these in place will form an important element of the Local Development Plan process.</p>
<p>Conflict between badger foraging and development pressures on suitable land.</p>	YES	<p>The Green Framework recognises the sensitive nature of the badger population in and around the growth corridor. The green framework safeguards a range of different types of green space in the countryside around developments in order to maintain a good level of biodiversity in the area. In addition new wildlife corridors provide linkages between developments, allowing badges and other wildlife to move freely within the growth corridor. The Council has an adopted policy on Badgers which requires any development over 1 hectare in isolation to appoint a badger surveyor to assess the need for a badger survey. This is applicable in the A96 Development growth corridor .</p>

Potential disturbance of protected sites along the route of the Coastal Link Path	YES	The current coastal link path is shown on the green framework and has been informed by discussion with the relevant stakeholders in the area. The detailed routing will be subject to much greater levels of assessment as the Frameworks contained within the document are firmed up through the Highland Wide Local Development Plan.
Potential impact on designated sites of natural and historic or cultural value.	YES	The Green Framework clearly identifies the sites of natural and cultural heritage importance in the Corridor. Allocations identified within the Framework have also where possible been located to avoid areas of sensitivity. As detailed planning work continues, and allocations for development are refined, the detailed impacts and any necessary appropriate assessments will be undertaken in more detail.
Impact on designated areas	YES	The allocations throughout the Corridor have been informed by the designated areas which surround them.
Loss of greenfield sites to development and associated impacts on local biodiversity, habitat connectivity and protected sites	YES	The Framework works to accommodate growth and to effectively manage associated negative impacts upon local biodiversity concerns by providing ample green spaces, buffer zones (green wedges), safeguarding protected areas, woodland and countryside All detailed development proposals with the potential to affect European protected sites are required to be subject to Appropriate Assessments under the provisions of the EU Habitats Directive, which requires consideration of effects on the management and integrity of the site in question Some permanent loss of local greenfield space compensated by urban development of greenspace and the quid-pro-quo protection and enhancement of extensive areas throughout the A96 Corridor
Development may affect the European and Nationally protected sites as well as locally important wildlife networks	YES	Appropriate Assessments will be required for any detailed development proposal that could impact upon European protected (Natura 2000) sites There is a significant overall positive effect through protection of extensive countryside and woodland areas, development of additional wildlife corridors and the identification and safeguarding of protected European and national sites of importance

Soil, Water and Land Use

Potential issue of Soil Sealing	INDIRECTLY	The Council recognises that soil sealing is a problem with any new development. The Council recommends the use of Sustainable Urban Drainage (SUDs) to combat some of the problems associated with soil sealing.
Some water bodies in the area, such as Loch Flemington, are suffering from nutrient enrichment as a result of past land management practices and sewage discharges, resulting in 'blooms' of blue-green algae, which can kill other aquatic life.	YES	The optioneering process leading to the production of the preferred options for Nairn, Inverness East and the Green Framework have consistently recognised the numerous protected sites within the study area and throughout, these sites have been given priority in locating development proposals that avoid the likelihood of negatively impacting upon their integrity.
Development on identified floodplains should be avoided.	YES	The A96 framework takes account of flood plains and areas at risk of flooding as identified by SEPA. Most of the areas at risk have been avoided, and the Council is continuing to work with SEPA on a number of areas which remain of concern.
Many sources of pollution directly affect species at the lower end of the food web, such as filter feeding bivalves (cockles, mussels, etc), pollutants may then be passed on up the food chain.	INDIRECTLY	The Framework does not promote any potentially contaminating land uses and all development is considered suitable for use in relation to existing issues with associated identification and remediation where necessary. In addition planting suitable trees along river courses (riparian zones) is promoted as a means of reducing soil erosion, runoff events and helping limit pollutants from soils and surface spillages/ contamination entering the local water environment.
Potential affect on Dolphins in the Inner Moray Firth	YES	There are proposals in the framework which aim to utilise effective plant and technology at Ardersier to produce high quality disinfected effluent to be pumped into the Moray Firth using the existing 250mm outfall pipe to accommodate the expected large increase in flows.
Affect on biodiversity due to increased water demand	YES	The Framework provides a strategic approach with effective phasing of development with water supply infrastructure and waste water treatment that replaces existing small sites to improve the local water environment. In addition, the Framework encourages new developments to provide water demand reduction measures through the increased use of

		sustainable building techniques.
<p>Soil resources include archaeological soils containing remains and a record of past human activity, development could lead to the loss of some of these areas/ features</p> <p>Some land take is necessary to accommodate expected population growth leading to concerns over the potential effects of land use change</p>	YES	<p>Following consultations with Historic Scotland, the Framework highlights identified historic features and affords protection from development, in association with Highland Council policies that presume against development that negatively affects historic features</p> <p>Rural land take has been minimised throughout the Masterplanning process with key development areas concentrated around the urban fringes of Nairn and Inverness</p> <p>Minor negative impact of development overall, however the Framework works to minimise negative effects by assigning multiple urban areas for greenspace, as well as identifying much of the A96 Corridor hinterland as of value and worth protecting</p>
<p>Risk of pollution affecting watercourses</p> <p>Risk of increased populations overloading current wastewater treatment works</p> <p>Increased populations will lead to increased water demand</p>	INDIRECTLY	<p>The Framework directs the framework for development proposals and provides fully assessed capacity studies for local water supply and treatment, an assessment of SUDS methodologies, as well as directing future development away from flood plain areas, as part of the fundamental planning approach</p> <p>The Framework provides a strategic approach with effective phasing of development with water supply infrastructure and waste water treatment that replaces existing small sites to improve the local water environment</p> <p>Minor negative impact of development, as increased construction and population can be expected to impact upon water quality at some point, however the Framework limits these effects through consideration of floodplains and increased planting, which can help reduce pollution impacts</p> <p>Overall long term effect is expected to be neutral with some potential for short term impacts if development is not properly phased with water supply and treatment infrastructure</p> <p>The Framework recommends effective co-ordination and delivery mechanisms based on joint ventures across the A96 Corridor</p>
<p>Positive overall effects identified by minimal land take for urban development and the protection of</p>	YES	<p>Loss of greenfield land is minimised by the Framework and the Green Framework provides quid-pro-quo protection of other greenfield areas</p>

<p>countryside and woodland areas Positive effects to be realised by securing green wedges and buffer zones between urban areas</p>		<p>The Framework provides an effective framework for managing growth and minimising rural land take The Framework works to safeguard countryside, woodland, environmental and historic assets</p>
Population and Health		
<p>Access to nature without hindering the economic activities of the surrounding area</p>	YES	<p>The Framework provides for improved path networks, access to local environmental assets and important view points across the corridor. This supplements the contents of the Core Paths Plan Plans are also outlined for improved access to critical sites including a route between tourist centres running from Culloden Battlefield to Rait Castle, which may improve the economic vitality of some areas within the corridor.</p>
<p>Potential for use of energy efficient and renewable resources within the corridor</p>	YES	<p>Energy and water efficiency have been encouraged throughout the Framework. It is considered that proposals that include considerations for energy efficiency and the use of renewable energy should be given priority.</p>
<p>Projected population increases in the area are expected to increase traffic pressure in Nairn town centre and at the Inverness Raigmore Interchange; leading to higher levels of congestion and local urban air pollution.</p>	YES	<p>The Framework includes provision for bypasses for Nairn town centre and the Raigmore interchange. This is addressed through the A96 Developer Contributions Protocol. It is anticipated that the bypass and improvements to the interchange would reduce the congestion and therefore alleviate local air pollution in certain areas. The benefits of the reduced congestion on the Raigmore interchange maybe lessened as the route passes directly by the regional sports complex, campus green spaces, and high density housing therefore the anticipated health benefits of reducing traffic flow may not be realised.</p>
<p>Increasing populations require sufficient access to services, healthcare, reliable public transport and greenspaces – preferably in conjunction with designed walking and cycling routes.</p>	YES	<p>The Framework improves linkages between facilities for local communities. The Framework aims to provide improved public transport infrastructure (bus lanes and rail upgrades, park and ride facilities, accessible high density housing making routes more viable for transport operators and more attractive for residents) The Framework provides for the fundamental design principle of creating walking and cycle friendly places</p>

		as well as improving public transport infrastructure
Potential for social exclusion following rapid increase in population without sufficient provision of affordable housing, health and social care	INDIRECTLY	<p>The Framework outlines proposals that direct development to the most suitable locations (after considerable consultation processes) that are expected to lead to the realisation of viable neighbourhoods and sustainable patterns of phased development. Viable neighbourhoods includes the provision of affordable housing to meet the Highland Council's target of 25% provision in areas of housing need.</p> <p>The Framework affords opportunities for local healthcare provision, education social and community services, improved public transport infrastructure, community access and employment options as well as the protection of cultural heritage and the historic environment.</p>
<p>Potential for numerous development proposals to negatively affect the overall environmental quality of the A96 Corridor</p> <p>Positive effects are to be expected through the development of the Green Framework proposals with the inclusion of extensive walking paths and trails along and across the Corridor.</p>	YES	<p>The Framework provides Urban Frameworks guiding sustainable development for the accommodation of expected population increases of up to 30,000 people.</p> <p>Green Framework proposals increase the environmental aspects for the sustainable development of the Corridor area as a whole.</p> <p>The Framework has an overall significant positive effect in developing the A96 Corridor with respect to sustainable patterns of location and type of development by minimising and mitigating negative effects associated with large population increases.</p> <p>The Framework provides the framework for improved path networks, access to local environmental assets and important viewpoints across the Corridor.</p>
New developments must be adequately serviced by effective utilities infrastructure, preferably infrastructure that is designed following sustainability principles minimising energy use and maximising renewable or recycled resources.	YES	The Framework has been strategically phased as not to add too much pressure onto the existing infrastructure in the area in one short burst. However, it will be a requirement for new developments to follow the guidance laid out in the Designing for Sustainability in the Highlands SPG
Waste management for increasing populations should incorporate provision for effective recycling and minimisation.	NO	The Framework does not address waste issues directly but does provide a strategic framework for development proposals to provide more detailed assessment at local levels.

		New housing developments in the growth corridor will have to provide sufficient space for waste segregation at source allowing more effective management and recycling.
Urban drainage should be designed using SUDS principles to minimise risks of flooding.	YES	The Framework encourages the use of Sustainable Urban Drainage Systems to prevent surface runoff and emulate natural drainage systems as much as practically possible. Due to the presence of Inverness Airport it is essential that large expanses of water must not be used in SUDS as they attract birds which would cause a danger to aircraft. It is hoped through the intelligent siting of SUDS it will be possible to use this type of drainage as not to present a risk to aircraft and perhaps could cause a net benefit in attracting birds away from the airport.
Inappropriate development can affect the landscape, the historic environment (destruction of resources/ impacts on historic or landscape setting) and amenity values for local residents.	YES	The Framework has been developed to address the issue of suitable locations for development that is going to happen along the corridor. The Framework uses the significant landscape and historic environments as constraints to development and therefore there will be little or no negative affect on these environments. The Framework identifies the many historic features within the area as priority assets and presumes against development that will negatively impact protected features.
Local landscapes and important views should be adequately protected.	YES	The Urban Frameworks recognise local features, important views and the landscape qualities of the approaches to Nairn and Inverness. The planning process includes the use of Landscape Character Assessments and Landscape Capacity Appraisals to determine areas capable of absorbing new/increased urban development.
Potential for new development to detract from existing character of Nairn's seaside holiday setting. Potential that new development and in-migration increases property prices and leads to exclusion of local residents. Development pressure could reduce greenspace and urban amenity. Increasing rates of local consumption and waste	YES	A key development principle of the framework is to respect and create effective places that respect local character and distinctiveness. The Framework outlines appropriate mixed use and housing density development that respects local distinctiveness, providing for local historic features and settings. The Framework secures green spaces within the Urban Frameworks. Smart Growth principles are proven to deliver more effective places that add to urban amenity for residents.

<p>production increases pressure on local facilities.</p>		<p>The Highland Council have indicated that housing developments will have sufficient space for waste segregation at source, allowing more effective management and recycling.</p> <p>The Framework does not address waste issues directly but does provide a strategic framework for development proposals to provide more detailed assessment at local levels.</p> <p>Proposals for waste management facilities are not included within the remit of the A96 Corridor.</p>
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Air		
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<p>Increasing populations will lead to increased transport emissions – either by increasing private car use or through increased demand for public transport</p> <p>Significant negative effect on overall urban air quality to be expected from increased population</p>	<p>YES/NO</p>	<p>The Framework addresses some of these issues by providing for improved public transport infrastructure.</p> <p>The Framework provides for the fundamental design principle of creating walking and cycle friendly places as well as improving public transport infrastructure.</p> <p>Proposals for A96 dualling will help improve traffic flow, dispersing emissions and allowing the provision of dedicated bus lanes to improve public transport infrastructure.</p> <p>Suitable provisions for a bypass at Nairn will significantly improve local air quality in the town. The Framework will have a positive effect on managing transport emissions.</p> <p>The Framework cannot reduce expected increases but does provide means to mitigate and promote alternative forms of transport in a strategic manner.</p> <p>Ongoing negative effect due to expected increases in transport levels.</p> <p>The Framework provides means to mitigate these pressures but must be combined with other proposals and technologies to determine a suitable long-term sustainable solution.</p>
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Climatic Factors

Overall negative impacts on climate due to pressures of accommodating up to 30,000 more people in any area
 All development will present issues with respect to energy use and transportation effects

INDIRECTLY

The Framework is not responsible for these impacts but addresses the issues of how to accommodate such growth in a sustainable manner
 The Framework mitigates and manages climatic impacts through the strategic direction of growth to make accommodation of 30,000 people less damaging.
 Extensive planting regimes will go some way to mitigating local GHG production.
 The Framework addresses the issues of sustainably managing population growth, however the overall impact of development will be negative as GHG production will increase in line with population levels.
 The Framework directs the framework for future development but cannot control methods used by developers.
 Detailed development proposals will be required to demonstrate consideration of energy conservation in line with the Highland Council's Supplementary Planning Guidance, 'Designing for Sustainability in the Highlands'.
 Population increases will increase overall GHG emissions, leading to a negative assessment of effects, however the Framework directs growth and provides Green Framework proposals to mitigate climate effects.

Historic Environment

Potential for urban development to lead to damage to, or in extreme cases, loss of local historic features
 Potential for unsuitable development to affect the

YES

Consultations with Historic Scotland have helped direct the process
 The Framework identifies the many historic features within the area as priority assets and presumes against development that will negatively impact protected features

<p>wider historic or landscape setting of features and affect the townscapes of Conservation Areas</p> <p>Potential loss or damage to historic/ natural history features associated with road developments</p>		<p>The Highland Council has similar policies within the Inverness and Nairnshire Local Plans</p> <p>Road routings are indicative only and are not to scale, historic features will be taken into account in more detailed appraisals and EIA at lower levels of plan development, with the presumption that specific routes that impact historic sites will be rerouted to avoid damage</p> <p>Overall neutral impact is expected for the Urban Frameworks as the Framework recognises historic sites and lists them as constrained development areas</p> <p>Planting proposals could affect some features, requiring further consultation with Historic Scotland on suitable planting regimes/exclusion zones</p> <p>The historic environment is recognised as adding value to new developments as it encourages/ aids the establishment of an area</p>
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Landscape

<p>Developments have the potential to negatively affect the local landscape through unrestricted and unsympathetic construction that does not respect landscape features or important views</p>	<p>YES</p>	<p>The Framework is developed to address the issue of suitable locations for development that may happen along the Corridor. The Frameworking process includes the use of Landscape Character Assessments and Landscape Capacity Appraisals to determine areas capable of absorbing new/ increased urban development.</p> <p>The Framework maintains open aspects, introduces green wedges and environmental buffer zones at critical places to ensure there are no encroachments/ coalescence of urban expansions. Overall positive effects are expected for the Urban Frameworks.</p> <p>Urban Frameworks recognise local features, important views and the landscape qualities of the approaches to Nairn and Inverness. The Framework aims to deliver urban expansion to accommodate population increases whilst maintaining the local 'countryside' feel to the area</p>
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Table 1 - How Environmental considerations have been integrated into the A9 Growth Corridor Development Framework

How opinions expressed during consultation have been taken into account

Responses to the Strategic Environmental Assessment Environmental Report were received from the Consultation Authorities. In addition a number of responses to the public consultation referred specifically to the Environmental Report.

The Consultation Authorities have raised a number of important issues in relation to the content of the Environmental Report and their earlier input through the scoping stage of the exercise. The matters raised are very useful and have resulted in some changes to the finalised Framework, as detailed in the appendix. The majority of comments will also either inform the Strategic Environmental Assessment which must be prepared for the Highland Local Development Plan or inform the detailed master planning exercises which are or will be carried out in relation to the expansion areas identified in the Plan.

The comments from the public in relation to the Environmental Report also provide useful contribution to the work which will be needed to identify suitable mitigation to the environmental impacts associated with any development of this scale.

Whilst there has been some criticism of the Strategic Environmental Assessment process for the A96 Corridor in the responses received, the lack of detailed allocations and specific mitigation proposals at this Framework level makes the assessment process very difficult, and impossible to outline every eventuality. That said, the next stage of the work (through the Local Development Plan process) will offer an opportunity to address the majority of the perceived weaknesses. The SEA Statement will set our commitments to follow through on these as more detail comes forward.

It is proposed that close working arrangements are established with SEPA, Scottish Natural Heritage and Historic Scotland to enable a much more proactive approach to the preparation of the Strategic Environmental Assessment on the Highland wide Local Development Plan.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
Scottish Environment Protection Agency (SEPA) – dated 5 April 2007				
1	Covering Letter	Alternatives to the Framework do not seem to have been assessed in a manner which allows consideration and comparison of potential effects.	A full examination of alternatives has been undertaken in Stage 1 and Stage 2 of the Framework's development. Stage 1 considered eight alternatives for accommodating long-term growth. Stage 2 has considered a further range of growth alternatives at Inverness and Nairn (five for each settlement). This has allowed exhaustive consideration and comparison of potential effects.	No Change.
2	Covering Letter	Some significant proposals within the proposed Framework area, in the form of development at Whiteness, Tornagrain, small settlement expansions and Inverness Airport have not been taken into consideration	The Environment Report considers the impact of these proposals at a framework level through discussions on the Green Framework. In addition, the detail of these proposals has been developed through different initiatives outside the explicit scope of the A96 Corridor Framework Stage 2. However the detailed Strategic Environmental Assessment on the Highland wide Local Development Plan will address these issues in greater detail.	No change, but the issues raised will be flagged up during preparation of the Local Development Plan, including the preparation of a further Strategic Environmental Assessment.
3	Scope of the SEA and Scoping report Responses (section 2.3.2 / section 3.1 and elsewhere)	The ER made it clear that Stage 1 of the Masterplan included policy outcomes in relation to amongst others, "a preferred location for a new settlement of 10,000+ located south of Inverness Airport.", "A new community/resort at Whiteness" and	See 2 above.	As above.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>“growth of existing smaller settlements in the Corridor.” Development at Inverness Airport is also outlined in the Green Framework.</p> <p>While it is acknowledged that Whiteness already has outline planning consent SEPA would have expected all these aspects of the current Masterplan to have been assessed as part of the SEA process and considers the lack of specific consideration of the above sites a weakness in the overall assessment. SEPA considers that this is likely to result in potential significant effects of the Masterplan being underestimated.</p>		
4	Wider Environmental Context (Section 3.3 and Appendix A)	SEPA considers that this appendix provides a very well researched list of the plans, programmes and strategies and legislation which might impact upon the Masterplan, but is disappointed to note that the policies SEPA identified as likely to be relevant at the scoping stage have not been included.	<p>Noted.</p> <p>It was felt that the additional SEPA policies should be more effectively considered at a more detailed level; however the additional SEPA policies could have been added to Appendix A.</p> <p>The additional SEPA policies identified were</p> <ul style="list-style-type: none"> • SEPA policy 19 – Groundwater protection policy for Scotland, and • SEPA’s policy on Provision of waste water drainage in settlements <p>The ER does make specific reference to EU, UK and national level policies, and offers a synopsis of the environmental objectives at the relevant strategic level of the Framework.</p>	No Change. The future Strategic Environmental Assessment exercise will however refer explicitly to the policies mentioned.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
			Groundwater and drainage issues (including SUDS) were discussed within the Environmental Report.	
5	Environmental Baseline and Issues (section 4)	<p>SEPA is generally satisfied with the scope and level of detail provided on the environmental baseline which takes into consideration most of the comments SEPA made at the scoping stage, however the following should be noted.</p> <ul style="list-style-type: none"> • The Shellfish Harvesting waters at Whiteness Head should have been acknowledged in the Water section; • In line with SPP7 the 200 year event (rather than 50 or 100 year event) should be used to determine the current coastal flood risk (section 4.8.18); • The sea level rises quoted in section 4.8.19 are in the middle range of the latest guidance on climate change from UKCIP. It should be acknowledged that the extreme predictions would double the figures quoted in the ER. Also, research by the Scottish Executive Central Research Unit Environment Group Research Programme "Research Findings No.19 – Climate Change: 	Noted.	Amend Environmental Report to highlight the presence of the Shellfish Harvesting waters, and ensure inclusion within the Strategic Environmental Assessment to accompany the Highland wide Local Development Plan.
		<ul style="list-style-type: none"> • The Shellfish Harvesting waters at Whiteness Head should have been acknowledged in the Water section; 	Noted.	Amend Environmental Report.
		<ul style="list-style-type: none"> • In line with SPP7 the 200 year event (rather than 50 or 100 year event) should be used to determine the current coastal flood risk (section 4.8.18); 	Noted. The Environmental Report suggestion on estimates of current flood risk is accepted as an error. The Framework itself was produced using the 200 year event for risk assessment, in line with SPP7.	Amend Environmental Report.
		<ul style="list-style-type: none"> • The sea level rises quoted in section 4.8.19 are in the middle range of the latest guidance on climate change from UKCIP. It should be acknowledged that the extreme predictions would double the figures quoted in the ER. Also, research by the Scottish Executive Central Research Unit Environment Group Research Programme "Research Findings No.19 – Climate Change: 	Noted. The extreme predictions and associated risks for tidal flooding range should be acknowledged.	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>Flood Occurrences Review, 2002” suggested that areas below the 5.0 m contour could be at risk of tidal flooding, rather than “up to 4 – 5m becoming vulnerable”;</p>		
		<ul style="list-style-type: none"> The section on climate change would have benefited from information on the local context or the nature of current emissions of greenhouse gases from the A96 corridor area (section 4.11). If no such information exists this could usefully have been stated; 	<p>The ER states in section 4.11.1 that, “Detailed information on the level of CO2 emissions at a local authority level are not available for the Highlands and Islands region”. This suitably implies that there is no local emissions data.</p>	<p>No change</p>
		<p>The Responsible Authority should be minded that the provision of re-routed roads which are significantly longer will not necessarily reduce the level of transport emissions within the A96 Corridor and the removal of the bottleneck could actually encourage additional private vehicles onto the local road network.</p>	<p>Noted. The Council is aware of these considerations, and all ongoing work is directed towards identifying multi-modal solutions which allow public transportation, cycling and pedestrian links to be brought forward, rather than purely focussing on private vehicles.</p>	<p>No change</p>

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
6	Selection of SEA Objectives (section 5.1)	SEPA welcomes the clear justification provided for choosing each of the SEA objectives and considers Table 5.1 as an example of good practice. A number of the objectives, could, however still have been tightened up as suggested at the scoping stage.	Noted. SEPA recommend the use of more effective terminology, such as 'increase', 'reduce' rather than 'minimise' or 'maintain'; however as the draft Framework is setting a framework for development, the use of 'minimise' and 'maintain' was considered effective in this case. Some of the objectives were tightened up where possible, as recommended.	No change
		In relation to the commentary on flood risk, rather than suggesting "preference should be given to development out with the flood zones" comments should relate to ensuring accordance with the risk framework identified in SPP7.	Noted. The finalised development frameworks do adopt the recommended approach.	Allocations within the final framework were identified to avoid areas at risk from flooding. In light of supplementary comments received, the Council recognises that the potential flood risk in particular areas such as at the business / industrial area to the east of Nairn and the residential allocations to the north of Firhall and Moss-side in Nairn as well as in East Inverness, will have to be subject to further assessment.
7	Compatibility Testing (section 5.2 and Appendix C)	It is presumed that, rather than as is stated at the beginning of the section, the Vision and Development Principles have been assessed against the SEA Objectives to determine their environmental performance.	The appraisal assesses the Vision & Principles (high level Framework objectives) against SEA objectives and the resulting analysis assesses environmental performance.	No change.

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		<p>As the Vision Statement itself makes no meaningful reference to protection of the environment receptors which SEPA is specifically interested in, then SEPA does not consider it possible to score the Vision in such a positive light. At best, in SEPA's opinion, the Vision Statement should be scored as 'neutral or unknown impact – difficult to predict' against SEA objectives relating to soil, water, air and climatic factors. SEPA considers that this highlights an environmental weakness in the Vision which SEPA would encourage the Responsible Authority to address. Rather than referring to 'distinctive green Highland places' the Responsible Authority may wish to consider replacing 'green' with a more robust language – for example "distinct sustainable and sensitively located Highland places...".</p>	<p>The vision is designed to provide an accessible and inspiring view of the future presented in plain English.</p> <p>The Vision Statement has already been agreed in earlier phases of Framework development.</p> <p>The Vision was scored as mixed or minor positive for the majority of air, water, soil & climatic factors and significantly positive when considering objectives promoting public transport and energy efficiency.</p> <p>This is not considered a weakness when the Vision is understood as a means of managing and mitigating the impacts of expected growth, rather than being a driver for growth.</p>	No change
		<p>SEPA is generally satisfied with the assessments of the Development Principles although SEPA's general comments in relation to Assessment of Preferred Options (below) should be noted. Addressing 'key road challenges' is likely to result in conflict and this will require appropriate mitigation.</p>	Noted.	No change

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		SEPA notes that the Vision and Development Principles are not actually stated in the Draft Masterplan.	The Vision and Development principles are integral foundations to the Framework.	The final draft Framework very clearly sets out the Vision and Development Principles for the A96 Corridor.
		SEPA welcomes the fact that detailed comments explaining the assessment results have been provided in Appendix C, and the subsequent matrices.	Noted.	No change.
8	Assessment Methodology (section 6.1)	SEPA is pleased to note the proposal to apply the precautionary approach to the assessment following the good practice outlined in the SEA Toolkit, however, SEPA does have concerns that this has not actually been fully applied and further comments on this are provided later.	Noted. The principles of the Precautionary Approach have been applied where considered necessary under appraisal conditions. Specific SEPA comments will be addressed below.	No change.
9	Approach to Mitigation (section 6.3)	SEPA supports the proposed implementation of the mitigation hierarchy, however, again SEPA is concerned that this has not actually been fully implemented.	Noted. The mitigation hierarchy was implemented whenever deemed appropriate. Specific SEPA comments will be addressed below.	No change.
10	Assessment of Urban Frameworks	In relation to the Urban Framework SEPA has taken this to mean assessment of	Noted. Section 6.5 and Appendix D refer to Phase	

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	(section 6.5 and Appendix D)	<p>the section entitled “Mixed Use Guidance for Nairn and East Inverness” as an entirety.</p> <p>SEPA makes the following specific comments in relation to the assessments presented in Appendix D for the Urban Framework:</p>	<p>2 of the Framework development process for the Urban Frameworks for Inverness and Nairn only.</p> <p>Phase 1 was not assessed under SEA.</p>	No change.
		<p>SEA Objective 5: SEPA accepts that rural land take probably has been minimised, however, since nearly all the proposed development occurs on rural land, much of it prime agricultural land SEPA considers that urban development will have a significant negative impact against the soil SEA objective. SEPA also does note the inclusion of the Whiteness development in this assessment.</p>	<p>Noted. However, the assessment considers the impact with respect to the soil resource over the A96 Corridor as a whole, of which the Green Framework advocates protection for large areas. The relative amount of rural land take overall was therefore assessed as a minor negative, rather than significant. This could have been made clearer in the accompanying commentary.</p>	No Change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>SEA Objective 6: SEPA agrees that there are likely to be significant negative impacts on the water environment due to increased populations overloading current sewage treatment works. Information presented in section 4.8 suggests that new facilities and significant improvement works will be required. SEPA understands that no commitment is made in the draft Masterplan to identify which of the options proposed are to be implemented or to require adoption by Scottish Water. As this is the case SEPA considers that no firm mitigation has been provided and the residual effect at this stage is still a significant negative effect on the water environment.</p>	<p>The commentary provided for SEA Objective 7 states that the Framework provides for a strategic approach to development in conjunction with effective phasing of water supply and waste water treatment infrastructure – this could have been included in the commentary for SEA Objective 6 to address SEPA's specific concern.</p>	<p>No Change</p>
		<p>SEA Objective 7: It is not clear whether the draft Masterplan makes it explicit that additional water supply will need to be secured from Loch Ness before certain phases of development can commence. If this is not the case then applying the precautionary approach residual effects could still be significantly negative.</p>	<p>Separate considerations have been progressed by Scottish Water in these regards and the resulting assessment of a residual mixed impact was deemed effective as at this point in time. SEPA are fully involved in the options appraisal work that Scottish Water are undertaking, and the outcomes of this work will flow into the statutory Local Development Plan process.</p> <p>In light of separate considerations being progressed by Scottish Water, as referred to above, a residual mixed impact was deemed appropriate. As with the wastewater treatment situation detailed</p>	<p>No Change</p>

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			<p>above, SEPA are aware that Scottish Water has committed to identifying a long term solution to water supply in the area. It is important that all partners work together to identify long term solutions based on development needs.</p>	
		<p>SEA Objective 8: Some of the sites allocated in the urban frameworks are in the area at risk of flooding based upon the Indicative River and Coastal Flood Map (Scotland). SEPA considers this a significant negative effect against this SEA objective. No mitigation for this is currently proposed in the draft Masterplan therefore SEPA considers, applying the precautionary approach, that residual effects would still be significantly negative. In line with the mitigation hierarchy SEPA's preferred approach to mitigation would be to remove sites identified as at potentially at risk. Further comments on this are contained in SEPA's response to the draft Masterplan.</p>	<p>Accepted. The issues raised by SEPA have been addressed within the final draft Framework. Amendments have been made to the Framework following receipt of clear information.</p>	<p>The Nairn Development Framework has been amended to reflect the issues raised by SEPA.</p>

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		SEA Objective 14: Due to the proposed increase in population SEPA considers that there will be a significant negative impact due to waste production. As the Masterplan does not include allocations or policies promoting waste recycling, re-use and reduction measures applying the precautionary approach SEPA considers that the residual impact is still significant.	<p>The assessment commentary does state that further detailed development proposals will have to respond to the Highland Council Development Plan Guidance, with sufficient provision for waste management measures.</p> <p>As this is a matter of detailed consideration beyond the scope of the land use and transportation framework, the residual effect of the Framework as mixed, was deemed appropriate</p>	No change, but the issue of waste management will be an important element of the Highland wide Local Development Plan review. It is expected that SEPA will play a major guiding role in this review, and that for the moment, the approved Highland Structure Plan provides a robust policy position on waste management.
11	Assessment of Green Framework (section 6.5 and Appendix D)	The assessment of the Green Framework does not seem to have considered the potential impacts of the dualling of the A96. SEPA considers that this is likely to have significant negative impacts on all the SEA Objectives relating to water, soil and air. Mitigation for this should be considered further.	<p>Accepted.</p> <p>Headline features of proposed works for the A96 are appraised in Appendix E, however the proposed dualling was not considered as an element of the Green Framework.</p> <p>Proposals for dualling the A96 will be subject to various other assessments including a Scottish Transport Appraisal Guidance (STAG) assessment, Environmental Impact Assessment, and in the context of the Highland wide Local Development Plan , a Strategic Environmental Assessment.</p> <p>As such, the assessment within the Framework SEA was limited in this respect.</p> <p>Comments on the effects are included in the appraisal of the development principles in Appendix C.</p>	No change. The work being undertaken by Transport Scotland on potential upgrading of the A96 will continue to inform the planning strategies for the A96 Corridor.

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12	Alternatives Considered (section 7)	<p>The planning process identified five framework options (alternatives) for both Inverness East and Nairn.</p> <p>Section 7.1.1 outlines that each alternative was subject to review and appraisal against 17 identified issues. A number of these issues relate to the environment. Appendix B seems to provide a summary description of the options but not of the assessment. It is therefore not clear that the alternatives have been assessed in any meaningful way.</p> <p>SEPA considers this a significant weakness in the ER.</p>	<p>During Stage 1 of the masterplanning process, eight options for accommodating growth across the Corridor were proposed and sustainably appraised.</p> <p>During Stage 2, the 5 framework options were assessed through extensive stakeholder consultation and sustainability appraisals.</p> <p>These appraisals are documented and available on The Highland Council website at http://www.highland.gov.uk/businessinformation/economicdevelopment/regeneration/a96-corridor-masterplan.htm .</p> <p>It was not considered necessary to evaluate further against SEA objectives specifically.</p> <p>The assessment of urban and green frameworks, as well as headline features of preferred options provides an effective appraisal at an appropriate strategic level for the framework.</p>	<p>The Environmental Report which will be prepared for the Highland wide Local Development Plan will stipulate the availability, content and coverage of existing option appraisals across Stage 1 & 2.</p>
13	Assessment of Preferred Options (section 7.3 and Appendix E)	<p>SEPA notes that the main components of the preferred options have been assessed. SEPA considers this approach appropriate.</p>	<p>Noted.</p>	<p>No change.</p>

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		<p>In general SEPA considers that the assessments of 'headline features' as outlined in Appendix E has been carried out conservatively and does not seem to consistently follow the precautionary principle proposed earlier in the document. Where significance is uncertain, more rather than less significance should be assumed for negative effects, and less rather than more significance should be assumed for positive effects.</p>	<p>Assessment of headline features was carried out in light of previous assessments for urban frameworks, therefore effects were determined to be more localised with lower overall significance. It is accepted that this distinction between the significance of effects i.e. localised and wider more significant could have been clearer in the Environmental Report.</p>	<p>No change.</p>
		<p>Any proposals which include physical development are likely to have at least short term negative effects against SEA objectives relating to air, water and soils during construction. This does not seem to have been acknowledged. For example, SEPA does not accept that all the housing in the East Inverness Preferred Option is likely to have 'no relationship' with all the water SEA objectives.</p>	<p>Please refer to response above, re. the qualification of significance in headline assessments.</p> <p>The effects of building development against SEA objectives were covered in the Urban Frameworks Assessment, any potential negative effects (long and short term) are identified there – it should be noted that the effects are neutral in the long term subject to proposed phasing of development of water infrastructure.</p>	<p>No change</p>

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		<p>Where impacts of development are long lasting or larger in scale these effects should be considered as significant e.g. engineering to watercourses which reduces the likelihood of reaching good ecological status, any proposals for development in areas identified as at risk from flooding. This does not seem to have been considered consistently. For example, the dual carriageway A9/A96 bypass will impact on the Scretan Burn and Cairnlaw Burn but this does not seem to have been acknowledged. Similarly it is noted the Scretan Burn also runs straight through the Innovation Park but this does not seem to be considered in the assessment.</p>	<p>The approach used attempted to apply SEA at an appropriate strategic level – these matters reflect detailed impacts beyond the consideration of the Environmental Report for the Framework. However, these will be brought forward to the relevant stage in the Local Development Plan or to the stage where detailed Frameworks are prepared.</p>	<p>No change, but these potential impacts in East Inverness should be brought forward for any consideration in relation to detailed masterplans in this area or within the preparation of the Local Development Plan.</p>
		<p>In relation to SEA Objective 5 on soil SEPA would have expected all individual proposals located on prime agricultural land to be assessed as conflicting with this objective, however, this does not seem to be the case. It is acknowledged that due to the land use history of the Masterplan area the scope for avoiding Greenfield development within the Masterplan is limited however this does not negate the requirement to identify the use of Greenfield or prime land as at conflict with the SEA Objective.</p>	<p>The use of agricultural and greenfield land around the urban fringes was deemed to be negative in the Urban Frameworks Assessment, and relative to the Corridor overall the Highland Council considered it to have a residual mixed impact.</p>	<p>No change.</p>

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14	Inverness	Dual carriageway bypass A9/A96 – SEA Objective 9: It is not clear how providing a dual carriageway bypass route will strongly promote/increase the use of public transport.	The bypass route is only part of a suite of transport improvements proposed for the City of Inverness. Improved connectivity, traffic flow and routing past the academic, innovation, sporting and retail facilities should benefit public transport travel times.	No change
		New Inverness College – SEA Objective 5: It is not clear how this development will remediate contaminated sites, conserve soil resources or safeguard prime agricultural land.	Restricting the building footprint on the site and providing a high quality parkland setting should minimise land take and conserve soils.	No change.
		Regional Sports complex – SEA objective 7: It is not clear why this specific proposal has been scored negatively.	It is accepted that this is an error in the assessment matrix.	The Environmental Report which will be prepared for the Highland wide Local Development Plan will review significance for Objective 7.
15	Nairn	A96 bypass – It seems clear that the proposed bypass, which will be routed on prime agricultural land, will require substantial earth moving works, will require a number of watercourse crossings (including the River Nairn), may at parts be at risk from flooding and potentially other watercourse engineering works will have significant negative effects against the SEA objectives for soil and water.	Noted. These features are assessed as having negative effects and the assessment of significance is in line with previous assessments on the Urban & Green Frameworks and the protection of resources across the Corridor as a whole. This distinction between the significance of effects i.e. localised and wider more significant could have been made clearer in the Environmental Report.	No change.

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		<p>Some areas of the new neighbourhood at South Nairn, the School site and the major business and industrial land allocation are within the 1 to 200 year Coastal and Fluvial Flood Maps and could potentially be at risk from flooding. SEPA considers this a significant negative effect of the Masterplan and should be assessed as strongly conflicting with the achievement of SEA Objective 8.</p>	<p>The Nairn Development Framework was prepared with limited information in these regards. Subsequently, improved information has allowed the Framework to be amended.</p>	<p>The Development Framework for Nairn has been amended to reflect the updated information on flood risk. As noted above, the Council recognises that the potential flood risk in particular areas such as at the business / industrial area to the east of Nairn and the residential allocations to the north of Firhall and Moss-side in Nairn as well as in East Inverness, will have to be subject to further assessment.</p>
		<p>It is not clear how allocating major business and industrial land on the eastern flanks of the town will result in a significantly promote /increase use of public transport.</p>	<p>In conjunction with the Nairn bypass route close-by the allocated area and improved access by public transport, reduced journey times, and proposals for bus lanes, etc. an increase in the provision and use of public transport to access this area will be expected.</p>	<p>No Change.</p>
16	General	<p>SEPA recommends that the assessments be reappraised in light of the above general and specific comments and all significant effects accounted for in mitigation.</p> <p>SEPA requests that the Post Adoption SEA Statement make it explicitly clear how each significant effect will be mitigated and who will be responsible.</p> <p>Without such an approach, it can be difficult to tease out the measures required and does not make any commitment that such measures are</p>	<p>Noted. The Council believes that a reappraisal is unnecessary as the actions outlined above allow SEPA's concerns to be addressed. The Framework concept of the Framework is reflected in the Environmental Report's high-level approach.</p> <p>More detailed appraisals through Environmental Impact Assessment will be required for specific proposals as they are developed. This table of comments will be integrated with the ongoing implementation as a means of confirming</p>	<p>No change. However, continued discussions with SEPA to take forward outstanding issues into the Local Development Plan process will be essential. It is intended that a more formal group involving SEPA, SNH and Historic Scotland will be set up to progress this.</p>

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		<p>indeed put in place.</p> <p>The Responsible Authority are reminded that one of the most important mitigation measures to consider in the ER is the way in which the Masterplan has been modified as a result of the effects identified in the environmental assessment process.</p> <p>SEPA requests that clarification of this also be provided in the Post Adoption SEA Statement.</p>	<p>effective response to consultation comment.</p> <p>A similar summary of the consultation comments and resultant actions will be included in a Post Adoption SEA Statement.</p> <p>However, the most appropriate means of taking the framework forward is through the new Statutory Development Plan for the area, of which the Framework will be one element. This Development Plan will be subject to further SEA. Many of the issues raised will be dealt with in that context.</p>	
17	SEA Indicators (section 8)	<p>A wide variety of potential SEA indicators has been identified most of which are usefully specific. However, it is not clear at this stage which of those proposed will actually be implemented and this should be clarified in the Post Adoption SEA Statement.</p>	<p>Noted. The Council will set out the relevant indicators within the post adoption SEA Statement.</p>	<p>Outline the relevant indicators which will be taken forward within the post adoption SEA Statement.</p>
18	Monitoring Framework (section 8.3)	<p>SEPA welcomes the Councils proposals to establish and maintain a Monitoring Register to centrally manage relevant information [sic]. Such a central register should streamline the SEA process for the Council and help to reduce the likelihood of duplication of work, both baseline assessment and monitoring, between departments.</p>	<p>Noted.</p>	<p>No change. Monitoring Framework to be established and implemented in close collaboration with the Consultation Authorities.</p>

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		The proposals to produce a short annual report are also noted.	Noted	
		The proposals for a monitoring framework as outlined in Table 8.2 are very comprehensive. SEPA welcomes the clear setting out of target trends and actions required. SEPA's only real query regarding this is how will or is it ensured that some of the actions will actually take place?	Noted. The Council is committed to improving the range of environmental information that is held to inform not just the implementation of the A96 Corridor project but all of the other Strategic Environmental Assessments required.	
Historic Scotland – dated 5 April 2007				
19	Covering Letter, Part 2: Environmental Report, Section 1	Only some of the comments we provided on the Scoping Report have been taken into account during the preparation of the Environmental Report.	Noted. The Environmental Report did not fully list or assess effects on historic sites identified as being within areas protected under the Green Framework, i.e. unaffected by the Framework.	No change.
20	Covering Letter, Part 2: Environmental Report, Section 2	The Environmental Report does not provide an objective or accurate assessment of the implications of the Masterplan for the historic environment.	Noted. However, the final Framework has been amended to explicitly recognise the important value of the historic environment.	The draft final Framework contains a number of references within the Green Framework section to the need to protect the historic environment. In order to strengthen this approach, it is proposed that a further bullet point should be added under the part of the document relating to protection and enhancement. This will read as follows, as a separate bullet point on page 7, the policy approach is to identify:

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				"the need to ensure that the historic and cultural heritage, and its setting, is protected as development opportunities across the corridor come forward".
21	Covering Letter, Part 2: Environmental Report, Section 3	The assessment of alternatives has not been undertaken using the SEA objectives and has not taken into account the information provided to The Highland Council by Historic Scotland.	A full range of alternatives for accommodating growth across the Corridor has been considered. This included eight strategic options during Stage 1 of the project. Five alternatives were considered for East Inverness and a further five options were examined for Nairn.	No change.
22	Covering Letter, Part 2: Environmental Report, Section 4	The assessment makes reference to integrating the historic environment into the Masterplan and to the inclusion of the historic environment in the Masterplan's principles. I have seen no evidence of such inclusion and therefore consider that the assessment somewhat overstates the position.	The historic environment is a critical asset to be utilised in bringing forward development of the Corridor. This is a clear development principle, which will be established through further design work in the future. Moreover, the impact of any development upon the historic environment will continue to be assessed against the provisions of the approved Highland Structure Plan and the adopted Local Plans in this area, until such time as they are updated within the new Local Development Plan.	The Council will ensure that the Local Development Plan provides adequate and appropriate policy provision for historic assets.
23	Annex B, Part 1: Introduction, Section 1	I am content with the information provided in this section.	Noted.	No change.
24	Annex B, Part 2: SEA and Consultation	One of the key aims of the SEA process, missing from Paragraph 2.1.1, is the provision of information to the decision-maker on the environmental effects of the	Noted.	No change.

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	Processes, Section 2	Masterplan.		
25	Annex B, Part 2: SEA and Consultation Processes, Section 3	The Scoping Report, however, implied that the Masterplan would apply to the whole of the study area.	The Framework does apply to the whole study area as required by the consultancy brief. However, the SEA Environmental Report and analysis was limited to those areas directly managed by the masterplanning consultants.	No change.
26	Annex B, Part 2: SEA and Consultation Processes, Section 4	<p>I am concerned that HS's response to the scoping report and the draft Masterplan (3 October 2006) have been somewhat misrepresented in the Environmental Report.</p> <ul style="list-style-type: none"> • 	Noted.	
		Historic Scotland's response to the draft Masterplan identified our concerns about the potential loss of nationally important historic environment features and/or effects on their setting. Nowhere does our response refer to "minor effects on the integrity of features" as set out in Paragraph 2.3.8.	Noted. The Framework stated 'At least minor effects ...and... at worst, result in permanent loss' - this was intended to reflect the potential range of effects. It is accepted that a more complete representation of HS comments, rather than paraphrasing a summary of concerns, may not have led to these conclusions.	Ensure full involvement of Historic Scotland in the preparation of the Highland wide Local Development Plan and associated Strategic Environmental Assessment.

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		<p>Whilst HS would be in favour of appropriate proposals to improve access and interpretation of the historic environment, this has not been stated in any of our previous responses to the draft Masterplan (Paragraph 2.3.9).</p>	Noted	As above.
		<p>We raised our concerns about planting both on and in the vicinity of scheduled ancient monuments and other features of the historic environment (Paragraph 2.5 of our letter of 3 October 2006). However, this related to the proposals for woodland/green space, rather than road screening proposals. Inappropriate planting can be detrimental to both the integrity of features and their setting.</p>	Noted. This issue will be taken forward through the Local Development Plan process and when detailed proposals for development begin to come forward.	Ensure that the concerns raised are flagged up during preparation of the Local Development Plan.
27	Annex B, Part 3: A96 Corridor Masterplan and its Context, Section 5	I found the information provided in this section helpful. Please note that “historic features” should be distinguished from “natural features” (Paragraph 3.1.3).	It is accepted that this is an error in the Environmental report.	
28	Annex B, Part 3: A96 Corridor Masterplan and its Context, Section 6	The list of historic environment legislation and policy set out in Table 3.1 does not mirror that set out in Appendix A.	NPPG 5 is omitted from Table 3.1. Others were included in the table after HS suggestions but may be omitted from printed revision of Appendix A.	Ensure full coverage of environmental legislation is included within the Strategic Environmental Assessment on the Highland wide Local Development Plan.
29	Annex B, Part 3: A96 Corridor Masterplan and its Context, Section 7	Environmental protection objectives are not set out in Table 3.1, other than those relating to Gardens and Designed Landscapes. Instead, a description of the baseline environment is provided.	The text does contain the overview that national policy is to protect and where possible enhance features of the historic environment.	No change.

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30	Annex B, Part 3: A96 Corridor Masterplan and its Context, Section 8	Table 3.1 states that the Masterplan recognises the important role of the historic environment as an asset, promotes the protection of the historic environment, and highlights protected sites and constraints. Given our concerns in Points 21-23 (below), I consider that the Masterplan in its current form does not live up to these aspirations.	The Masterplan meets these aspirations in the context of its consideration as a framework document.	No change.
31	Annex B, Part 4: Environmental Baseline and Issues, Section 9	Paragraph 4.2.4 sets out conclusions from the Stage 1 capacity assessments. I consider that these are planning issues, rather than issues for the environmental assessment, unless they are considered to be drivers of environmental change (which have on the whole not been identified).	The outcomes from Stage 1 through the capacity statements considered social, economic, environmental and accessibility matters in that round of considerations. These were planning issues identified earlier in the Framework process and summarised here as having some environmental impact but are not necessarily directly addressed at this stage or by the SEA.	No change.
32	Annex B, Part 4: Environmental Baseline and Issues, Section 10	(Section 4.4, Land Use in the A96 Corridor Area) The baseline information provided in this section focuses almost exclusively on biodiversity.	It is accepted that the baseline information is as stated. Sections 4.4 – 4.8 consider land use, water environments & biodiversity, flora and fauna.	No change.
33	Annex B, Part 4: Environmental Baseline and Issues, Section 11	Paragraph 4.4.20 states that the A96 Corridor Masterplan incorporates principles and guidelines for development that directs the use of land to inter alia conserve built/cultural, natural and historic resources. I consider that this	The critical Framework principle states that the development of the A96 Corridor “maintain and enhance open space, natural features and critical environmental areas and ensure these are provided within settlements and integrated into	See response at 20 above.

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		may be over-stated, given that they have not been provided in the current version.	development that maximise their recreational contribution to the quality of life.” It is proposed that the draft final Framework is strengthened to reflect the fundamental importance of the historic environment.	
34	Annex B, Part 4: Environmental Baseline and Issues, Section 12	I note that you have used the definition of the historic environment provided in our scoping response.	Noted	No change.
35	Annex B, Part 4: Environmental Baseline and Issues, Section 13	Paragraphs 4.1.5.3-6 show little understanding of the historic environment or the policy pertaining to it, and I suggest that you may wish to revisit this in future assessments.	Noted. It is hoped that the changes made now reflect a better understating of the historic environment. The continued involvement of Historic Scotland as The Council progresses the preparation of the Local Development Plan will ensure that these matters will continue to addressed.	No change.
36	Annex B, Part 4: Environmental Baseline and Issues, Section 14	Paragraph 4.15.13 sets out HS's definition of gardens and designed landscapes, but does not provide a reference; also, the quote is incomplete.	Noted. The quote should actually read: “grounds that are consciously laid out for artistic effect and most often contain architectural features, trees, shrubs, flowers, water features, lawns, woodland and parkland”, Scottish Historic Environment Policy (SHEP) 3 Gardens and Designed Landscapes.	No change.
37	Annex B, Part 4: Environmental Baseline and Issues, Section 15	The baseline information shown in Figure 4-7 is incomplete. See Annex C for details.	This was the latest version available at the time of submission, based on information supplied. Figure 4-7 was not intended to include sites not affected by Framework proposals (i.e.	No change, but ensure that a fully up to date baseline is brought forward for the SEA on the Local Development Plan.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
			within Green Framework areas), which includes several of those listed by HS in their Annex C.	
38	Annex B, Part 4: Environmental Baseline and Issues, Section 16	I note that this section (Paragraph 4.18.2) identifies effects on the historic environment (loss, effects on setting) as a concern. However, this does not appear to have been taken forward into the assessment matrices in any detail.	In the summaries of the Urban and Green Framework Assessments, the effects on the historic environment have been assessed in matrices at a level appropriate to the Framework. Historic environment features are not expected to be affected by proposals, however, the adopted Framework and the existing Development Plan will offer the appropriate level of protection should any such threat emerge.	No change.
39	Annex B, Part 5: Analysis of SEA Objectives, Section 17	I note that the SEA objective for the historic environment has been amended in line with suggestions made in our scoping response.	Noted.	No change.
40	Annex B, Part 5: Analysis of SEA Objectives, Section 17	The supporting text also identifies sites protected for their biodiversity and/or landscape value; their inclusion would dilute the assessment of effects on the historic environment.	The comment was included to emphasise the need to protect both historic and natural features.	Amend to include historic assets only within future Strategic Environmental Assessment,
41	Annex B, Part 5: Analysis of SEA Objectives, Section 18	I note that the Vision and Development Principles have been provided in the Environmental Report, but not in the Masterplan.	Noted.	The final draft Framework now very clearly sets out the Vision and Development Principles for the A96 Corridor.
42	Annex B, Part 5: Analysis of SEA Objectives, Section 19	The assessment for the historic environment is identified as “++”, presumably in light of the consideration that the Green Framework will improve	One of the guiding principles for the framework is to incorporate historic assets into the Framework. The impact of any development upon the	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>access to local historic environment features.</p> <p>However, development has the potential to adversely affect historic environment features and the assessment should therefore be changed to read “+/-“.</p>	<p>historic environment will continue to be assessed against the provisions of the approved Highland Structure Plan and the adopted Local Plans in this area, until such time as they are updated within the new Local Development Plan.</p>	
43	Annex B, Part 5: Analysis of SEA Objectives, Section 20	Nowhere in the assessment of the Vision and Development Principles has it been acknowledged that development may have an adverse effect on the historic environment, other than road development. This is a serious omission.	<p>Noted. It is hoped that the change proposed to the text of the Framework, set out at 20 above, will ensure that these concerns are met.</p>	
44	Annex B, Part 6: Assessment of Environment Effects and Mitigation Measures, Section 21	<p>The assessment of the urban framework has not identified the potential impacts on a number of historic environment sites.</p> <p>This could have been done, assessing the proposals contained in the frameworks against the baseline information provided by Historic Scotland.</p>	<p>Assessments maintained at a high level to reflect framework status of the Framework. However, individual development proposals will be required to assess potential impacts on the individual historic environment features/sites that HS require in line with national legislation and the Development Plan.</p>	
45	Annex B, Part 6: Assessment of Environment Effects and Mitigation Measures, Section 22	<p>I have the following comments to make on the assessment provided in Table 6.3:</p> <p>Potential Significant Effects</p>		
		<table border="1"> <tr> <td data-bbox="464 1101 716 1360">Potential for urban development to lead to damage to, or in extreme cases, loss of local historic features</td> <td data-bbox="716 1101 978 1360">Loss has been identified in at least two instances. Many of the historic environment features affected are of national, rather than local,</td> </tr> </table>	Potential for urban development to lead to damage to, or in extreme cases, loss of local historic features	Loss has been identified in at least two instances. Many of the historic environment features affected are of national, rather than local,
Potential for urban development to lead to damage to, or in extreme cases, loss of local historic features	Loss has been identified in at least two instances. Many of the historic environment features affected are of national, rather than local,			

No.	Reference	Comment		How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
			importance e.g. SAMs.		
		Potential for unsuitable development to affect the wider historic or landscape setting of features and affect the townscapes of Conservation Areas	This effect has been identified as minor negative; it should be significant negative, as setting of SAMs is of national importance (see NPPG5).	This effect has been listed in Table 6.3 specifically because it is a potential significant effect. The residual comment, after consideration of protection policies, identifies an overall neutral effect. The physical setting was considered a matter of detail beyond the scope of a framework document.	No Change
		Potential loss or damage to historic/ natural history features associated with road developments	Agree with this but note that impacts in the A96 Corridor area are not solely related to road development.	Noted. The potential for damage associated with roads is in conjunction with urban development.	No Change
		Mitigation Methods			
		Consultations with Historic Scotland have helped direct the Masterplanning process	Information provided in July and October 2006 does not appear to have been incorporated in the	HS information and comments were taken into account. Many of the comments were of a detailed nature to be considered at a later stage in the project's implementation.	No Change

No.	Reference	Comment		How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
			assessment.		
		The Masterplan identifies the many historic features within the area as priority assets and presumes against development that will negatively impact protected features	This information is not included in the Masterplan. Baseline information provided by HS has been only partially incorporated into the assessment.	Baseline information pertaining to the framework has been incorporated into considerations (i.e. specifically relating to Nairn and East Inverness). Table 4.13 identifies the SAMs (existing and proposed) and Listed Buildings that are of most concern in the Urban Framework.	No Change
		The Highland Council has similar policies within the Inverness and Nairnshire Local Plans	No Masterplan policies have been provided as part of this consultation.	The adopted Local Plans for Inverness and Nairnshire will remain in place until such time as the new Local Development Plan is prepared.	No Change
		Road routings are indicative only and are not to scale, historic features will be taken into account in more detailed appraisals and EIA at lower levels of plan	HS will hold discussions with Transport Scotland regarding the appropriate routing of the A96 trunk road.	Noted	No Change

No.	Reference	Comment		How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		development, with the presumption that specific routes that impact historic sites will be rerouted to avoid damage			
		Residual Effect			
		Overall neutral impact is expected for the Urban Frameworks as the Masterplan recognises historic sites and lists them as constrained development areas	The Masterplan provided for consultation does not provide this undertaking. Accordingly, this impact remains significant negative. Indeed, loss of SAM 6001 to housing cannot be mitigated in this way.	The urban frameworks respect the historic assets within them. There is no proposal within the framework for any loss of Scheduled Ancient Monuments, and mitigation at the detailed level will be put in place given the presumption against development in these areas. It is nevertheless important that potential impacts on the historic environment at the more detailed level are spelled out within the Local Development Plan or within the more detailed masterplanning exercises being undertaken.	Ensure that potential impacts on the historic environment are identified and avoided in line with national policy.
		Planting proposals could affect some features, requiring further consultation with Historic Scotland on suitable planting regimes/ exclusion zones	Planting on SAMs would require scheduled monument consent from HS.	Noted.	No Change.

No.	Reference	Comment		How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		The historic environment is recognised as adding value to new developments as it encourages/ aids the establishment of an area	This is not a benefit to the historic environment, but an added value to development. The impact is therefore neutral.	Noted. This comment seems to mirror the consultants overall assessment.	No Change.
46	Annex B, Part 6: Assessment of Environment Effects and Mitigation Measures, Section 23	Table 6.4 provides a summary which focuses exclusively on the positive impacts of the green framework. However, the assessment of the green framework has disregarded the potential adverse impacts on a number of historic environment sites.		The green framework is underpinned by the policies for protection of such sites. The table is not intended to seem to disregard the importance of the historic environment/assets, but to imply that the principle of protection is fundamental to the framework and no impacts are anticipated.	No change.
47	Annex B, Part 7: Alternatives Considered, Section 24	I note that the assessment of alternatives has not been undertaken using the SEA objectives. This is not in accordance with the intentions set out in the Scoping Report (Paragraph 5.5.1) or, indeed, with good practice. In consequence, the historic environment has not been considered in the assessment of alternatives. However, these alternatives all have adverse implications for the historic environment, as set out in HS' letter to The Highland Council of 2 October		The implications as set out in HS' letter were considered in the preparation of the developed frameworks and referred to as a critical consideration in deliberations.	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		2006. These issues should have been considered in the decision-making process.		
48	Annex B, Part 7: Alternatives Considered, Section 25	No assessment is provided of the negative effects arising from the proposals at East Inverness. Historic Scotland has assessed these proposals and consider that certain aspects may have significant effects. I therefore consider that the assessment is inadequate.	There are no significant negative effects anticipated as arising from the framework at East Inverness. In that respect The Council does not agree that the assessment is inadequate. It is submitted that the level of detail is not yet sufficient to allow this conclusion. As well as the adopted Local Plan for the area and the approved Highland Structure Plan, national policy protecting such sites is very much in place. The Council will continue to engage with Historic Scotland as various schemes come forward.	No change,
49	Annex B, Part 7: Alternatives Considered, Section 26	I note that the Environmental Report considers that cumulative effects are difficult to predict. However, given the level of development proposed for the A96 Corridor area, and the level of information available, I consider that an overview could have been provided (as in Appendix D, for example). In consequence, there is no overall view of the potential effects of the development of the A96 Corridor on the environment to aid decision-makers.	Although not an in-depth analysis, an overview of other developments is provided. It is accepted that a summary matrix may have added clarity. That said, the Local Development Plan process will provide the additional information as and when further detail becomes available.	No change.
50	Annex B, Part 8: SEA Indicators, Implementation and Monitoring, Section	I am content with the indicators.	Noted.	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework																						
	27																								
51	Annex B, Part 8: SEA Indicators, Implementation and Monitoring, Section 28	However, I suggest that the “potential data sources” identified will not provide the information needed for monitoring.	The list provided is indicative and not all encompassing; please refer to 17 above. The Council will continue to work with all of the available data sources to ensure the correct level of information is included.																						
52	Annex C: Baseline Historic Environment Data, Scheduled ancient monuments	<p>The following scheduled ancient monuments are not shown on Figure 4-7.</p> <table border="1" data-bbox="464 646 978 1364"> <thead> <tr> <th data-bbox="464 646 682 751">Scheduled ancient monument</th> <th data-bbox="682 646 800 751">Index Number</th> <th data-bbox="800 646 978 751">Grid Reference</th> </tr> </thead> <tbody> <tr> <td data-bbox="464 751 682 862">Howford, ring ditch 100m NW of</td> <td data-bbox="682 751 800 862">5095</td> <td data-bbox="800 751 978 862">NH874538</td> </tr> <tr> <td data-bbox="464 862 682 938">Kebuck Stone, Cross Slab</td> <td data-bbox="682 862 800 938">9433</td> <td data-bbox="800 862 978 938">NH825555</td> </tr> <tr> <td data-bbox="464 938 682 1049">Brackla Farm, enclosure 300m SW of</td> <td data-bbox="682 938 800 1049">5027</td> <td data-bbox="800 938 978 1049">NH857513</td> </tr> <tr> <td data-bbox="464 1049 682 1187">Hillhead of Ardersier, ring ditches 1050m W of Littleton</td> <td data-bbox="682 1049 800 1187">5071</td> <td data-bbox="800 1049 978 1187">NH780564</td> </tr> <tr> <td data-bbox="464 1187 682 1297">Aiten Farm, ring ditch 850m SW of Wester Bog</td> <td data-bbox="682 1187 800 1297">5026</td> <td data-bbox="800 1187 978 1297">NH792552</td> </tr> <tr> <td data-bbox="464 1297 682 1364">Ballagan, enclosure 300m</td> <td data-bbox="682 1297 800 1364">5028</td> <td data-bbox="800 1297 978 1364">NH796526</td> </tr> </tbody> </table>	Scheduled ancient monument	Index Number	Grid Reference	Howford, ring ditch 100m NW of	5095	NH874538	Kebuck Stone, Cross Slab	9433	NH825555	Brackla Farm, enclosure 300m SW of	5027	NH857513	Hillhead of Ardersier, ring ditches 1050m W of Littleton	5071	NH780564	Aiten Farm, ring ditch 850m SW of Wester Bog	5026	NH792552	Ballagan, enclosure 300m	5028	NH796526	<p>It is accepted that these are not shown on Figure 4-7. However HS are aware that problems with GIS and data mapping led to revisions of this overview.</p> <p>The version used in the Environmental Report was the most recent revision available at the time of submission.</p> <p>It is also likely that these features were not included as they lie within the areas to be protected by the Green Framework, i.e. no development effects.</p>	
Scheduled ancient monument	Index Number	Grid Reference																							
Howford, ring ditch 100m NW of	5095	NH874538																							
Kebuck Stone, Cross Slab	9433	NH825555																							
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Aiten Farm, ring ditch 850m SW of Wester Bog	5026	NH792552																							
Ballagan, enclosure 300m	5028	NH796526																							
			The review of the Local Development Plan will incorporate these features.																						

No.	Reference	Comment			How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		ENE of				
		Balblair, enclosure 100m ESE of	5164	NH804514		
		Loch Flemington, barrow 1000m SSE of Balspardon	5005	NH806519		
		Old Petty, motte 115m WSW of	3141	NH738498		
		Clava Cairns, chambered cairns, ring cairn, stone circles and chapel	90074	NH752439		
		Milton, ring-ditch 320m SSE of	6001	NH709466		
53	Annex C: Baseline Historic Environment Data, Listed Buildings	There are many listed buildings in the study area that are not shown in Figure 4-7, and this is not acknowledged in the report.			Listed buildings within the A96 Corridor that were not directly impacted through the framework's considerations (i.e. East Inverness and Nairn), are consequently not shown in Figure 4.7.	No change.
54	Annex C: Baseline Historic Environment Data, Gardens and designed landscapes	Figure 4-7 shows Culloden House garden and designed landscape. There are also the following 4 other gardens and designed landscapes present in the study area that should be shown on the map.			These assets within the A96 Corridor were not directly impacted through the framework's considerations (i.e. lie within Green Framework areas – unaffected by proposals).	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework
Scottish Natural Heritage (SNH) – dated 28 March 2007			
55	Covering Letter - SEA Environmental Report: General Comments	<p>We are disappointed to note that many of our comments at the scoping stage (see our letter dated 4 September 2006) have not been incorporated into the Environmental Report. Our response to the Environmental Report therefore reiterates a number of our previous comments. Our main comments are:</p> <ul style="list-style-type: none"> • The designated areas and protected species, including European Protected Species, present within/adjacent to the A96 corridor are not adequately described. • Potential impacts on designated areas are not adequately recognised. • The indicators for designated areas and protected species are vague and the targets to highlight the desired outcomes are not SMART and, in some cases, absent altogether. • The baseline landscape is not adequately described and we consider this is likely to lead to an underestimate of the impact of the development on the landscape and visual resource. <p>SNH therefore conclude that the Environment Report does not adequately</p>	<p>Comments made by SNH were reviewed and addressed throughout the process, however we did not include a section specifically reviewing comments individually.</p> <p>Data tables included are taken directly from those available on the JNCC website.</p> <p>Further direction on ‘adequate descriptions’ would be useful and welcomed.</p> <p>Specific comments will be addressed below.</p> <p>Specific comments will be addressed below.</p> <p>The baseline landscape character description undertaken for the Framework at Stages 1 and 2 is adequate to inform the preparation of a high level framework.</p> <p>The Framework sets the ‘framework’ for development – SEA was carried out as a high level assessment to reflect the nature of the framework. When the development proposals contained in the Framework become part and parcel of the Local Development Plan, and subject to further SEA, mitigation and monitoring will be further reviewed and refined to the appropriate detail.</p>

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>identify the current state of the environment and key trends. Nor does it adequately assess the likely significant effects on the environment. In addition, the mitigation and monitoring measures described in the report are not SMART and are too vague to give confidence that they will prevent, reduce or offset any significant adverse effects on the environment when the masterplan is implemented.</p>		
56	<p>Non-Technical Summary - Page 13: Summary of Green Framework</p>	<p>There is no mention of European Protected Species or nationally protected species under Biodiversity, Flora and Fauna. This is a serious omission and should be rectified.</p>	<p>Omission noted. However, protected species are addressed in the main report.</p>	<p>Ensure that European Protected Species along with Protected Sites are fully recognised within the Strategic Environmental Assessment on the Highland wide Local Development Plan.</p>
57	<p>Non-Technical Summary - Page 17:10 Cumulative Impacts</p>	<p>Please note that Appropriate Assessments are only relevant in relation to Natura 2000 sites and not all designated sites.</p>	<p>Noted. Text states 'as required by the EU Habitats Directive' for any projects having significant impacts on protected European sites.</p>	<p>No change.</p>
58	<p>Table 3.1: Biodiversity, Flora and Fauna</p>	<p>Nature Conservation Act (Scotland) 2004 should be added to the list of key documents. Ramsar sites should be added to the list of designations covered in the 'how objectives have been taken into account'. In addition SPAs and Ramsar sites</p>	<p>Noted. This Act is included in the Appendix list, it is unfortunate that this was omitted from Table 3.1, however this Table was designed as an overview, and reference is made to the wider list in Appendix A, as in Section 3.3.1 of the Environmental Report. Ramsar sites are mentioned within the Environmental</p>	<p>Ensure that details are included within the SEA on the Local Development Plan.</p>

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		should be added to the list of sites that will not be damaged by schemes.	Protection Objectives listed.	
59	Table 3.1: Landscape	The Inner Moray Firth Landscape Character Assessment (1998). The Inverness District Landscape Character Assessment (1999) and the Moray and Nairn Landscape Character Assessment (1995) should all be listed as key documents.	Noted. These documents should be included in any future assessment, especially with respect to SEA upon the Development Plan, into which the Framework will feed.	Ensure that these documents are included within the SEA on the Highland wide Local Development Plan.
60	4.4.16	Please note that juniper scrub at Kildrummie Karnes SSSI is of national rather than local importance.	Noted. This designation was drawn from the LBAP documentation.	
61	4.4.19 page 34	We are not sure where "...priority work areas and objectives for SNH ..." referred to in this section have come from. Natural Heritage Futures prospectus 21 provides an overview of our aspirations in this general locality—although it covers a much wider area than the A96 corridor. A copy of the prospectus can be seen at http://www.snh.org.uk/futures/Data/pdfdocs/MorayFirth.pdf	Noted.	No change.
62	4.5.4.	The legislation referred to in this paragraph should be referenced as "The Protection of Badgers Act 1992 as amended" and "Wildlife and Countryside Act (Scotland) 1981 as amended".	Noted – Reference to both Acts should be "as amended" and delete the phrase "and a subsequent amendment... (1985)".	Ensure correct level of importance is included within future SEA.
63	4.5.5	The Inverness Badger Planning Policy Guidance Note and its accompanying Best Practice notes should be referred to here. This is especially relevant in	Accepted. Local documents could have usefully been referenced. However, it is determined that this is a matter of detail beyond the consideration of an Environmental Report for the high level framework. The policy guidance note will however	No change.

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		<p>relation to paragraph 4.5.7 of this section as the Badger PPGN includes a flow diagram that describes the approach that should be taken when a development is sited within a badger territory.</p> <p>The guidance note is available at: http://www.highland.gov.uk/yourenvironment/planning/developmentplans/developmentbriefsandframeeworkplans/badger-policy-guidance-note.htm</p>	<p>be used to assess proposals which do come forward in advance of the Local Development Plan.</p>	
64	4.5.6	<p>Please note that it is now an offence to recklessly disturb or damage a badger sett.</p> <p>For clarity it should be noted that amongst other things SNH are the licensing authority for planning, development and research work and SEERAD are the licensing authority for agricultural and forestry operations.</p> <p>Further information can be found in our publication “Naturally Scottish: Badgers” (ISBN: 1 85397 254 1). This is available from: Scottish Natural Heritage, Publications Unit, Battleby, Redgorton, Perth, PH1 3EW. Telephone 01738 444177 Email: pubs@snh.gov.uk</p>	<p>Noted.</p>	
65	4.5.12	<p>SNH have ‘designated’ rather than recorded SSSIs.</p>	<p>Future Strategic Environmental Assessment will note the replacement of “ recorded” with “ designated”.</p>	
66	4.5.13	<p>Please note that under the Nature Conservation (Scotland) Act 2004 developments within SSSIs that have full planning permission do not require</p>	<p>Noted – the Environmental report should have noted “proposed” before development; and deleted “will require” and replaced with “should be consulted upon with SNH”.</p>	

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		additional consent from SNH.		
67	4.5.15	<p>Please note that:</p> <ul style="list-style-type: none"> • SPA's are classified for rare and vulnerable birds, listed in Annex 1 to the Birds Directive, and for regularly occurring migratory species rather than for habitat. • Loch Flemington is covered by another designation. It falls within the boundary of Kildrummie Kames SSSI. • For consistency all relevant SPAs should be listed in this paragraph 	<p>Noted.</p> <p>Para. 4.5.1a notes that all SPAs are also SSSIs. This paragraph actually refers to the fact that Loch Flemington is not covered by Ramsar/ SAC etc.</p> <p>To avoid repetition, SPAs with other classifications are not listed.</p>	<p>The fact that t Loch Flemington also falls within Kildrummie Kames SSSI has been noted and will be addressed as such in ongoing work.</p>
68	4.5.16	<p>As the SAC series has now been adopted by Europe there are currently no candidate Special Areas of Conservation (CSACs) in this area and therefore these sites should be referred to as SACs.</p> <p>Please note SACs are selected rather than identified.</p> <p>For consistency all relevant SAC should be listed in this paragraph. They are Moray Firth SAC, Cawdor Wood SAC and Culbin Bar SAC. Please note that there is not an SAC called the Moray Coast and Inner Moray Firth Regions.</p>	<p>Noted.</p> <p>These are listed.</p> <p>Accept that name is incorrect – rephrase as Moray Firth SAC.</p>	<p>In future the correct SAC name will be used (Moray Firth SAC).</p>
69	4.5.17	<p>The Inner Moray Firth SPA is described in this paragraph under the SAC title. This information would be best presented in the paragraph about SPAs.</p>	<p>Noted. A matrix format may have added clarity to this section.</p>	<p>No change.</p>

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
70	4.5.18	The two Ramsar sites referred to in this paragraph are the Inner Moray Firth (a composite four piece site) and the Moray and Nairn Coast. Both sites are also designated as SSSIs and classified as SPAs. However, only part of Moray and Nairn coast is also an SAC.	Noted.	No change.
71	4.6.3	It is worth noting that Ramsar sites have the same policy protection as Natura 2000 sites.	Noted – these are also listed as – SAC, SPA, SSSI and covered by earlier comments.	No change.
72	Table 4.2	The Inner Moray Firth SPA is not listed as an SAC. The header Species currently occurring at levels of national importance should read 'noteworthy importance' not national.	It is listed in paragraph 4.5.18 and in the line in the table stating "Also listed as...". Terminology on importance was taken directly from the JNCC website details.	No change.
73	Table 4.4	The information on 'soil and geology' and 'geomorphology and landscape' is background information only and should be listed as such. The current presentation is confusing and implies that the SPA qualified for these features.	It is accepted that the table could be clearer; however the details were adopted from JNCC tables.	No change.
74	Other SACs and SPAs	Tables for the Inner Moray Firth SPA, Moray and Nairn Coast SPA, Culbin Bar SAC and Moray Firth Sac should be added to this section.	Ramsar data tables were used, as it was felt that mentioning the other designations within these tables would avoid repetition.	No change.
75	Figure 4.2	The shape file for Kildrummie Kames SSSI is incorrect. The site is not a composite site and therefore should not appear as three separate shape files.	The SSSI is presented in a simplified manner to aid interpretation and to ensure clarity. The shape file is crossed by roads and may look like separate sites, however this is not actually the case.	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
76	4.8.1	Non-native invasive species that are of particular concern in riparian areas within this study area include Japanese knotweed, giant hogweed, Australian swamps stonecrop and signal crayfish.	Noted.	No change.
77	4.16.2	The list of key sensitive landscapes in incomplete: it does not include all the ancient woodlands or Historic Gardens and Designed Landscapes found in the study area. Nor does it mention commercial woodland blocks, which are a key feature of the Forest Edge Farming Landscape type found within the study area.	<p>Noted.</p> <p>The details provided cover those key sensitive landscapes as they pertain to the preparation of the framework.</p> <p>These and other key features were identified and examined through the Green Framework Working Group, which involved the active participation of SNH.</p> <p>Please refer to responses to HS comments above, re. specific sites within Green Framework areas with no expected effects are not mentioned.</p>	No change.
78	4.16.10	We welcome the recognition that there is an opportunity to enhance access provision in the area by adding to the existing network. It is important that settlements are designed with clear landscape links between housing and path networks.	Noted.	No change.
79	4.16.11	This paragraph refers to greenspace and wildlife corridors. It is important that the location of wildlife corridors is informed by survey work. However, we understand from 6.5.3 that 3 corridors have already been identified. It would be helpful to get further information about this selection process.	Selected through consultation with SNH, local farmers and land managers.	No change.
80	4.18.2	With reference to bullet point 8, please note that the Castle Stuart Golf Course	Noted.	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		development has full planning consent.		
81	Table 5.1-1	For the avoidance of doubt paragraph 3 should be altered to read ‘..if development is likely to have a significant effect on an SPA, Ramsar site of SAC an appropriate assessment should be carried out. Licenses may be required if protected species are to be disturbed and the statutory requirements regarding SSSIs must be adhered to’.	Noted.	Ensure that this point is fully recognised within the Strategic Environmental Assessment on the Highland wide Local Development Plan.
82	7.4.11	Work within SSSIs. Please note that work classified as an Operation Requiring Consent may require consent from SNH. However, if another regulatory body has given consent then additional consent from SNH is not required. Pleas see http://www.snh.org.uk/publications/online/designatedareas/ssi2/default.asp for further information	Noted.	Ensure that this point is fully recognised within the Strategic Environmental Assessment on the Highland wide Local Development Plan.
83	Appendix A: A96 Policies, Plans and Programmes And Appendix D	In our opinion, specific or SMART measures have not been used to illustrate column 3. Instead there are vague references such as the ‘...Masterplan should minimise the risk...’ or the ‘...Masterplan should promote choice...’ Or ‘... adequate consideration of impacts... will be recommended’. Similarly we consider some statements to be inadequate, for example ‘...Adequate consideration of impacts affecting biodiversity with support for more detailed assessment at the local level	The measures are appropriate in the context of a development framework, and as a guide to monitoring proposals. The Council will consider the targets on future implementation and development of the Local Development Plan.	Consider the targets on future implementation and development of the Local Development Plan.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>where appropriate will be recommended...'</p> <p>In our opinion the mitigation and enhancement measures described in Appendix D are also vague.</p>		
84	Appendix A: A96 Policies, Plans and Programmes	The document's reference to the Modernising the Planning System White Paper is now very dated and reference should be made to the Planning etc. (Scotland) Act 2006. Omission of this document is a serious oversight.	Noted. The review of the Local Development Plan will be fully considered in the context of the Planning etc (Scotland) Act 2006 and associated Regulations.	No change.
85	Appendix A: A96 Policies, Plans and Programmes	The consideration of the Birds and Habitats Directives are confused and their implication poorly described. For example, the legislative requirements and implication of the proposals, in terms of the three tests described in the Regulations should be clearly spelt out. The reference to 'regional SPAs' is not appropriate and should be removed.	Further described within the Environmental Report – Note on Natura 2000 obligations section 4.6.	No change.
86	Appendix A: A96 Policies, Plans and Programmes	Repeating the text relations to adequate consideration of biodiversity is not helpful in this section.	Noted.	No change.
87	Appendix A: A96 Policies, Plans and Programmes	There is no mention of European Protected Species (EPS) in relation to the Birds and Habitats Directives, or the legislative protection afforded to EPS.	Noted. Future work on the Statutory Development Plan should identify European Protected Species as described.	The preparation of the Local Development Plan will include detailed discussions with SNH to highlight how these European Protected Species will be identified.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
88	Appendix A: A96 Policies, Plans and Programmes	The reference to the Wildlife and countryside Act is not comprehensive and only concentrates on SSSI legislation. This should be widened to include information about the protection of scheduled species outwith designated areas.	Noted.	No change.
89	Appendix A: A96 Policies, Plans and Programmes	The consideration of impacts is weak in relation to the implications of the Biodiversity Action Plan, for example: 'The A96 Corridor plan will take account of the principles within this document and through the local level plans.' We consider that greater consideration should be given to biodiversity in the wider countryside.	Assessment is appropriate given the nature and level of the Framework. Wide ranging protection of biodiversity in the wider countryside has been provided by the Green Framework.	No change.
90	Appendix A: A96 Policies, Plan and Programmes	The section on the Land Reform Act concentrates on community land ownership and not on responsible access for all or the development of core path networks. Although the latter is touched upon in the @SOAC section' we consider it would be more appropriate for it to be described in the Land Reform Act section.	Noted.	No change.
91	Appendix A: A96 Policies, Plans and Programmes	In terms of NPPG14, the Appendix states 'The A96 Corridor Masterplan should aim to reflect the spirit of the guidance, including its positive approach to sustainable development.' Please note that the Masterplan should comply with the policy framework of NPPG 14 and not	Noted. The Council's view is that the draft final framework, when looked at along with the up to date Development Plan does comply with the policy framework of NPPG14.	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		simply reflect the spirit of the guidance.		
92	Appendix A: A96 Policies, Plans and Programmes	We are disappointed that none of the Planning Advice Notes have been analysed to establish how they affect or are affected by the Masterplan. The PAN's represent current best practice and more comprehensive analysis of them would clarify how the Masterplan reflects this good practice.	Noted. It was not considered necessary to consider the Planning Advice Notes at the level of detail suggested. However in light of comments received future SEAs will provide a full assessment of them.	No change.
93	Appendix A: A96 Policies, Plans and Programmes	The entry for the Inverness and Nairn Local Biodiversity Action Plan should indicate how this affects or is affected by the A96 Masterplan.	<p>Noted. The provision of green corridors and bridges, connected urban green spaces and pathways and the provisions of the Green Framework were all deemed to be beneficial for local biodiversity.</p> <p>The preparation of the Local Development Plan offers an opportunity to ensure full linkages are made with the Local biodiversity Action Plans for the area.</p>	Discuss further with SNH in the context of the Local Development Plan review.
94	Appendix A: A96 Policies, Plans and Programmes	We reiterate our earlier advice that the Inverness Badger Policy Guidance note should be included in this appendix.	Noted. Refer to 63 above.	No change.
95	Appendix D: Urban Frameworks Assessment: row 1	The wording of the SEA Topic/Objective is confusing. Surely it should read protected species and designated sites including geomorphological sites.	The Council is satisfied that the wording was correct, but it is appropriate to discuss further with SNH in view of the imminent preparation of an SEA on the Local Development Plan.	No change
		The Anticipated (Significant) Environmental Effects column does not take into account the potential impact the proposed Nairn bypass could have on Kildrummie Kames SSSI.	There is no anticipated impact from the suggested by-pass on the SSSI at this stage of the Framework's development.	No Change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		SNH disagrees that the impact on 'environmental, historical and geological' will be positive. If anything the impact will be 'mixed'.	Protection of sites is positive. (Green) Loss of greenfield & threats to badgers is negative (Orange). Therefore the overall assessment is mixed.	
		Please note that badgers are not protected under the Wildlife and Countryside Act. They are afforded protection under the Protection of Badger Act as amended by the Nature Conservation (Scotland) Act 2004.	Noted - The Protection of Badgers Act is listed, however, we accept the error regarding the Wildlife and Countryside Act.	
96	Appendix D: Urban Frameworks Assessment: row 4	The reference to grey squirrel control would be more appropriate in row 1 of this table.	Noted.	
97	Appendix D: Urban Frameworks Assessment: row 6	This line refers to the risk of increased populations overloading the current wastewater treatment plants. SNH reiterates the advice contained in our letter of (4September 2006) (Annex 1 Ref 21) relating to water quality and bottlenose dolphins. This advice should be referred to in the mitigation/enhancement column of row 6. We are concerned to note that a 'mixed' residual effect on water quality is predicted. Acceptable standards will be dictated inter alia by the conservation objectives of the Moray Firth SAC – see www.snh.org.uk/pdfs/about/directives/Moray_Firth.pdf	Noted. It is considered that the Mitigation column adequately addresses potential pollution impact on protected species and marine life generally through SEPA regulations and the detailed phasing of development and infrastructure. The residual impact of urban development is minor negative due to increased pressure on water environment, however we accept that set standards will apply and the long term effect will be neutral.	

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
98	Appendix D: Urban Frameworks Assessment: row 7	This row deals with water demand and notes that increased draw-down on reservoirs is likely to impact on biodiversity. As per our letter of 4 September 2006 a number of the local reservoirs are designated sites and/or support protected species and consideration should be given to the impact of water abstraction on these.	Detailed considerations & ecological survey will be required at the appropriate stage.	No change.
99	Appendix D: Urban Frameworks Assessment: row 11	We note that at least 400 ha of new trees will be planted including extensive urban development. As tree planting has the potential to have both a positive and a negative impact on biodiversity SNH recommends that a woodland management plan be written. This should include information about where the planting will occur, species mix and how this will affect protected species.	Noted. Council Forestry and Biodiversity Officers should be consulted on these proposals at the relevant stage in the production of the Local Development Plan.	Consult with relevant experts in preparation of Local Development Plan.
100	Appendix D: Urban Frameworks Assessment: row 16	The landscape sections of the SEA are underpinned by the A96 Landscape Character Assessment (LCA). However, we have a number of concerns about the LCA and these were described in a letter we wrote to The Highland Council dated 5 March 2006—a copy of this letter is available on request. If the comments we have made in relation to the A96 LCA are not adopted then we consider that the baseline landscape is not adequately described and this is likely to lead to an underestimate of the impact of the development on the landscape and visual	<p>The landscape character assessments undertaken were adequate for the level required to inform the preparation of a strategic framework.</p> <p>These assessments were also relied upon for the SEA under guidance from the masterplanning team.</p> <p>It will be beneficial for the Council and SNH to discuss how these landscape assessment issues can now be effectively utilised in the context of ongoing masterplan work, and also within the context of the new Local Development Plan.</p>	No change.

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		resource of the A96 corridor. It will also mean that optimal mitigation to address landscape and visual impacts will not be possible.		
101	Green Framework Assessment Table: 1	We disagree that the runway expansion at the airport is classified as a green development.	The Framework framework has been amended to identify this area as a green protection area.	Amend Framework to reflect this comment.
102	Appendix E: Preferred Options Assessment	From the drawings presented in other sections of the SEA we understand that the proposed Nairn bypass may have a negative impact on Kildrummie Kames Site of Special Scientific Interest (SSSI). This should be highlighted in the table.	The proposed by-pass does not have a negative impact on the SSSI, at this stage in the process, as the indicative route is not to scale and will be subject to further appraisal.	No change.
Individual responses received which refer to the Strategic Environmental Assessment				
103	Scottish Badgers	High density of badger social groups in this area – need to protect social groups and foraging habitats not just individual animals. Cumulative impact of development in this area will have a serious impact; - recommend that development be looked at as a whole and not on an adhoc, site by site basis.	Page 17, Section 10 of the Non Technical Summary states that “development should be in response to demand, effectively phased and coordinated throughout the Corridor to minimise the cumulative impacts of multiple development projects”. SEA will be undertaken at the Local Development Plan stage (when proposals for land take are sited/proposed in detail) i.e. looking at development and cumulative impacts as a whole.	No change, but recognise the important badger populations in this area. Any development proposal should be assessed in this regard and cognisance taken of the existing supplementary planning guidance on badgers, as well as SNH advice.
104	Scottish Badgers	Pleased to see that plans area already in place to carry out further surveys to	Noted	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		update information discovered in 2003.		
105	Mr. J.S. Brennan A3	SEA/ER 4.12.10 and 4.12.14 partially highlight the likely needs for a significant high density low-cost rented house sector. SEA/ER recommendations (paragraphs 4.12.18 and 4.12.19) are that the council continue its existing policy for new developments of 25% affordable housing which Council accepts does not address current needs effectively. Question whether the Masterplan in current state is flexible enough to allow effective response to this need for low cost rental homes.	Current Scottish legislation and advice issued by the Executive has informed the SEA, and will continue to inform the LDP. Housing needs assessment will assist in informing the Local Development Plan and Action Programmes in delivering affordable housing through the development process. The Council's emerging planning policy on this issue is to regard the 25% requirement as a minimum which can be increased if need can be proven and market conditions allow.	No change
106	B4/B5	Severe design challenge of the three green corridors proposed, considers that they won't do much for wildlife with the exception of grey squirrels and foxes.	The detail of the "challenge" will be addressed at the appropriate level, i.e. the Local Development Plan and associated SEA/EIA.	No change
107	C4	The proposed new Town is in an environmentally sensitive area, containing at least 1 nationally important badger sett, orchids and uncommon fungi. Highland Council's record (and that of their chief engineering contractors) of badger mitigation is one of failure and the Environmental Report is not much help so far.	Mitigation of effects on the biodiversity, flora and fauna at the Framework level is identified in Appendix D of the SEA. A more detailed investigation of mitigation will be undertaken as identified by the SEA of the LDP, if negative impacts from development are unavoidable.	No change
108	C5	A thorough ornithological survey of the airport, Tornagrain and business park area is overdue – ER addresses this only cursorily. An amphibian survey should be	Such surveys could be undertaken as part of the baseline information process necessary to be able to monitor and mitigate the effects of development on biodiversity, flora and fauna. This will be appropriately undertaken as the Local Development Plan	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		undertaken – data referred to in the ER is not detailed enough to serve as a basis for assessing the impact of the intended strategy on this area.	progresses. In addition information will be gleaned from the ongoing environmental assessment associated with many of the proposals which are coming forward in this area.	
109	C7	The Green Framework map dated November 2006 is not reliable enough to serve as a basis for supplementary planning guidance (as it tries to show both green expectations and theoretical land take) and contains at least one significant inaccuracy (preferred location for a waste water treatment plant at Blackcastle, not confirmed by SEPA or Scottish Water).	Noted Final locations still to be assessed by Scottish Water and dealt with through detailed planning applications.	No change. The indicative location of a wastewater treatment plant is now shown around Ardersier, although Scottish Water is currently preparing an options appraisal to find an appropriate site at the eastern end of the Corridor. The Council, SNH and SEPA have been involved in this scoping work, and will continue to assist Scottish Water to deliver the most appropriate solution for the area.
110	C8	Notional line of A96 diversion to Tornagrain will take noise away from residential areas of new town and impose it on neighbours either side of the railway including breeding corn buntings (identified in ER)	The actual course of the A96 dualling and diversion to proposed new town are yet to be considered as part of the planning application process. Due consideration at the LDP, its' SEA and further assessments at the detailed planning stage will allow impacts to be further assessed.	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
111	D1a	ER accepts that the frequency of 200 year flooding events are likely to increase – Ardersier is vulnerable to such events, and increased amounts of treated effluent are likely to end up on its beach, to the detriment of the local community.	Aim of the SEA and ER is to identify and then mitigate adverse impacts from proposed development .The necessary water and sewerage infrastructure will be phased alongside development. Due consideration at the LDP, its' SEA and further assessments at the detailed planning stage will allow impacts to be further assessed.	No change
112	D1a	Proposal for 'Dalcross' appears to be in front of Dalcross Castle. Paragraph 4.15.17 identifies that Historic Scotland are working on a strategy for the protection of battlefields – may be the only way to deflect proposal.	The historic environment has been taken into consideration in the SEA. Impact on listed buildings and scheduled monuments will be closely monitored by the consultation authority, Historic Scotland, and further consideration is appropriate at further detailed planning stages.	No change
		Proposal to discharge into the Nairn is possibly going to add to further downstream discharges (one of SEPA's concerns) and proposed technology is not trouble free.	The aim of the SEA and consultation on it is to inform the development process of potential impacts and identify ways forward in mitigating where possible. We will work with SEPA to address this potential problem at more detailed stages of the planning process.	No change
113	D3	Reference to the proposed EfW refuse plant in the Inner Moray Firth Area – should NOT be sited within any sightline or prevailing upwind direction of any settlement, especially between Gollanfield and Balloch. Reasonable for such an assurance to form part of SPG to emerge from this process.	The Highland Structure Plan contains appropriate and approved locational guidance on waste management facilities. Further consideration to such issues will be given at the Local Plan and detailed application stages.	No change
114	D4	A failing of the ER it its constant reference to the ability of the Masterplan to address more or less successfully	The aim of the SEA and Environmental Report is to identify ways forward in minimising adverse and maximising positive environmental effects, not just at the end of the process but throughout it. Therefore the Framework has been developed with	No change

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		nearly all of the problems it lists.	constant review with regard to possible impacts, the outcome being a Framework where the likely impacts have been minimised as far as is possible, not one where there are no adverse impacts.	
115	W. B. Nield	Pleased to see that proposals to build in the flood plain around Balnaspirach have been dropped in the current Framework Plan, good news for wildlife such as migratory greylag geese.	Noted	
		Highlighting problem of drainage from the bypass in this report will benefit when it comes to designing the road.	No Change	
		Development to the north west of the B9091 at Balnaspirach will inevitably involve surface water being discharged yet again into the flood plain (identified by Halcrow on Page 16 of Non Technical Summary) – not confident that developers will identify and address the impact.	Noted. These issues will be addressed at the more detailed levels of planning, i.e. at Local Development Plan and when an application for development is made.	
116	RSPB	Current proposals are an improvement on earlier documents but adverse environmental impacts have been underplayed.	Noted	
			No change. RSPB will continue to make an important contribution to the preparation of the	

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		<p>Matrixes on pages 97 and 98 of the SEA identifying that the parkland associated with the new campus and other green wedges will support biodiversity targets is oversimplifying the issue – currently as farmland, it supports several species of nationally declining birds, and the species will disappear once area ceases to be actively farmed, and overall impact will be negative.</p>	<p>Illustrating the balance between negative and positive effects at this high level can often be perceived as oversimplifying.</p> <p>Comments regarding the loss of specific farmland species are accepted. Framework identifies the likely positive enhancement measures and these will be further detailed as the various proposals are taken to more detailed planning levels.</p>	<p>Local Development Plan, at which point further detail as to the proposals across the Corridor will come forward.</p>
117	Michael Hutcheson and Alison Lowe	<p>PDET Committee should postpone any decision completely until they are in possession of all reports (SNH, SEPA).</p>	<p>Noted - Committee postponed until SEPA, SNH, and Historic Scotland consultations received and assessed.</p>	<p>No change</p>
		<p>SEA document is only available at post offices, service points and exhibitions – unreasonable to expect anyone to read and digest it at these locations.</p>	<p>Noted – However all documents have been made available online to allow wider access.</p>	<p>No Change</p>

No.	Reference	Comment	How the comment has been taken into account in making the decision to adopt the A96 Corridor Growth Development Framework	
		Discrepancy between Biwater report and the 9 possible sewage disposal and treatment options identified in it, and the one that appears as preferred by officials on the Green Framework Map – decision should be postponed until councillors are in receipt of a final report from SEPA.	Final locations still to be assessed through work being carried out by Scottish Water in discussion with partner agencies and the community.	
118	J.A. and E.M.C. Holland	SEPA deadline for comments extends beyond the committee date that Councillors are going to vote.	Noted - Committee postponed until SEPA, SNH, and Historic Scotland consultations received and assessed.	
119	Ardersier and Petty Community Council	Retiring councillors cannot vote authoritatively before responses from statutory consultees on the SEA/ER have been perceived.	Noted	

Table 2 - How opinions expressed during consultation have been taken into account

Reasons for Choosing the A96 Growth Corridor Development Framework

Summary of Development Option Appraisal Process

Framework options for Inverness East and Nairn were produced through a stakeholder consultation process termed Collaboration for Success (CfS). This process allowed governmental agencies, community groups, political interests and private stakeholders the opportunity to participate in the development of five framework options (alternatives) for each location, which reflected the range of issues, concerns and opportunities represented by the mixed groupings. Each option was subject to review and appraisal on the following:

- Transport, access and accessibility
- Education & lifelong learning
- Development capacity
- Marketability
- Infrastructure
- Community
- Existing development
- Adjoining land uses and relationship with surrounding communities
- Pollution, waste and resources
- Energy
- Buildings, urban design and land use
- Open spaces
- Site characteristics
- Topography
- Landscape features
- Wildlife and habitat
- Views

The framework options/ alternatives were reviewed by technical staff to allow ease of comparison across a range of indicators. The updated framework options were then subject to a second round of CfS workshop events, containing a similar mix of expertise as the first, where each option framework was assessed in the context of:

Accessibility – Examining the range of transport options available including new road and rail infrastructure, public transportation links and improved pedestrian and cycle connectivity.

Economy – Promoting a strong local economy based on local job creation, education & lifelong learning opportunities and set within realistic market ambitions.

Community – Assessing the options with regards social justice, crime prevention planning, health and safety and the opportunity to create distinct and attractive places.

Environment – Looking at the opportunities to create quality urban design and the sustainable integration of land use, as well as how the development options would influence waste disposal and energy use, pollution reduction and mitigate for landscape and ecological impacts.

In parallel to the CfS sessions, technical reviews of the options assessing planning and urban design, transportation and market suitability were conducted by Halcrow and other consultants.

The outcome of both the CfS sessions and technical review process was a ranking of framework options for suitability and sustainability, which in turn led to the identification of the preferred development options for Inverness East and Nairn. The resultant preferred options are hybrids of the individually assessed options, which incorporate the benefits and eradicate major problems identified within the individual framework options.

Results of Development Option Appraisal Process

For Inverness East, the technical consultants' preferences were divided between options A (marketability), C (delivery and urban form) and E (traffic and planning), reflecting the range of strengths and weaknesses in each case.

A number of common themes emerged, which included the creation of a compact place with good mix of housing densities, the need to balance new employment opportunities with future population growth, the opportunities to integrate education, research and related business activities as a development cluster, and the selection of an A9/A96 bypass route which also furthers accessibility by non-car transport modes

Additional points of emphasis related to the scope to strengthen community provision for the established Culloden community within a new District centre for East Inverness.

Opportunities to facilitate bulky goods retailing adjoining the existing Retail Park to minimise transport effects and land take, consolidating wedges of parkland and flood risk zones as major open space corridors, and the merits of Beechwood as a university campus location offering high levels of accessibility.

The strongest messages concerned the wish to retain Balloch as a freestanding community within a green setting, support for urgent upgrading of the trunk road network and availability of coherent transport alternatives, together with the need to address significant deficiencies in key public services locally. The main agency comments covered rail services, green wedges, the new Inverness College/ UHI campus and the impact on birds and sensitive coastal habitats.

For Nairn, the technical consultants' preferences were stated as option A (marketability), B (traffic and planning), C (delivery) and E (urban form). Common development principles which emerged included the strong desirability of locating new population growth such that it can help reinforce a strong nucleus of town centre functions, the acute requirement to stimulate additional employment opportunities in Nairn, to avoid reinforcing the current high

dependence on unsustainable levels of net commuting, and the selection of an effective trunk road bypass route that also serves and integrates expansion into the fabric of the wider town.

Stakeholder participation through a series of local workshop sessions and discussion at the Nairn Framework Planning Group, ranked options as A and B followed by C. Although broadly similar to the technical outcomes, important issues were identified in relation to the avoidance of flood-risk zones, resistance to low density housing development on the western approaches, and a strong awareness of the very high intrinsic amenity of lands adjoining the River Nairn and overlooking the Firth at Delnies – these areas reflect both the original market town/ service centre and later coastal (fishing, links golf and mass tourism) traditions of Nairn.

Levels of public interest and participation in Nairn were particularly high and there was a noticeable appetite for the town to take stock and move forward. Option B (southern expansion) was strongly favoured in the written responses received. There was a high level of support for a town bypass and the earliest possible implementation. Town centre regeneration was important, together with well-planned and resourced green space.

Again, different options performed better on certain aspects of development suggesting that a hybrid overall solution would best match local expectations.

Measures that are to be taken to monitor significant environmental effects of the implementation of the A96 Growth Corridor Development Framework

Monitoring the implementation of the A96 Framework should enable two things to happen:

- Monitor how the Framework is affecting the environment, i.e. measuring indicators of identified issues;
- Monitor the environment more generally to allow unforeseen impacts to be picked up.

The SEA of the Framework identifies the environmental issues which are most likely to be affected by development proposals. Effective monitoring should compile detailed baseline data and assess it for comparison during and after the implementation of proposals. Any changes in baseline conditions or results will then present tangible information that can be attributed directly to development within the Framework area. Future monitoring relies on the baseline being updated.

Table 3 outlines a basic framework to undertake this monitoring. The framework incorporates the SEA indicators and a rationale for monitoring. Monitoring will be conducted by the Council on an annual basis in their capacity as Responsible Authority for the SEA.

As well as monitoring the changes on environmental conditions of issues foreseen by the SEA process, the process should also be wide ranging enough to 'pick up' other changes in the environment that the SEA has not identified as potential issues. The range of indicators and data sources in Table 1 is considered sufficiently wide to provide information on changes to conditions in the wider environment. These effects and changes to the environmental baseline may or may not be easily attributable to proposals implemented in the Framework. Should undesired changes occur, mitigation or remedial action will be addressed in future Local Development Plans, development or design briefs, and individual planning applications by means of the required SEA and EIA processes.

It is proposed that a Monitoring Register will be maintained by the Council, which will detail the relevant information to meet the monitoring requirements specified here. The Register will be available to the public and a short annual Monitoring Report will be produced by the Council, summarising the findings of the monitoring conducted during the previous year. The Monitoring reports will be forwarded to the SEA Gateway and published on the Council website. This monitoring regime will be further discussed with the Consultation Authorities following publication of this Post Adoption SEA Report.

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
Biodiversity, Flora and Fauna				
To protect designated wildlife and geological sites, maintain and enhance habitat connectivity and avoid irreversible species loss	Areas of European or national designated sites (Ramsar, SACs, SPAs and SSSIs) affected by development	European sites are key natural assets of the area and should be protected from development as a priority. A record of areas affected will build effective baseline data for future protection or enhancement measures	Target – No change, or increased areas of protection Actions – If protected sites are affected, effective consultation with relevant authorities and developers to determine remediation/compensatory measures	<ul style="list-style-type: none"> • Migrating and resident bird data, breeding locations to be avoided – RSPB, SOC • Data on protected marine species – Moray Firth Partnership • Designated sites – THC, SNH, HS; • Local priorities, targets and indicators for monitoring – Inverness to Nairn LBAP; • Protected woodlands / woodland areas – Forestry Commission;
	Number of development applications with approved Appropriate Assessments (AA)	Various development proposals across the area may impact upon European sites, a record of approved AA will demonstrate the Council is meeting the requirements of the Habitats Directive	Target – All relevant development proposals present effective appraisals of potential effects on European sites Actions – If protected sites are likely to be affected, in any way, effective consultations with relevant authorities to determine appropriate action	<ul style="list-style-type: none"> • Designated sites – THC, SNH, HS; • Local priorities, targets and indicators for monitoring – Inverness to Nairn LBAP; • Protected woodlands / woodland areas – Forestry Commission;
	Area of geological SSSIs affected by new development	Important geological SSSIs are a prominent feature of the area and should be protected as a priority A record of areas affected will build effective baseline data for future	Target – No change, or increase areas of protection Actions – If protected sites are affected, effective consultation with relevant authorities and developers to determine remediation/	<ul style="list-style-type: none"> • Designated sites – THC, SNH, HS;

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		protection or enhancement measures	compensatory measures	
	Changes in monitored populations of protected species (e.g. badgers)	Inverness and the A96 Corridor supports a large badger population, monitoring will help determine effects of development on population levels	<p>Target – Maintain healthy populations</p> <p>Actions – Any major proposals should incorporate a badger survey to determine likely effects on local populations</p> <p>Effective consultation with relevant authorities and developers required to determine relocation/compensatory measures</p>	<ul style="list-style-type: none"> Inverness Badger Survey – SNH
	Associated monitoring indicators of the Highland and Inverness / Nairn Local Biodiversity Action Plans (LBAP)	The BAP is currently being reviewed, any indicators relevant to species or habitats within the Corridor area should be incorporated into the Monitoring Framework	<p>Target – Incorporate local priority habitats and species into development considerations</p> <p>Action – Requires further consideration in association with local biodiversity officers</p>	<ul style="list-style-type: none"> Local priorities, targets and indicators for monitoring – Inverness to Nairn LBAP;
	Changes in area of semi-natural woodland cover / protected / ancient woodlands	Monitoring increases or reductions in woodland areas associated with development will allow early compensatory or enhancement measures to be implemented	<p>Target – Maintain ancient and protected woodland, increase area of semi-natural woodland</p> <p>Action – If developments affect protected sites then effective consultation with relevant authorities</p>	<ul style="list-style-type: none"> Protected woodlands / woodland areas – Forestry Commission;

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
			and developers required to determine relocation/compensatory measures	
Human health and population				
To promote healthy living: create conditions to improve health and reduce health inequalities.	Changes in number of households within 10 min walk from key services	Will give an indication of the success of Framework proposals to develop successful places that improve non-motorised access to key services	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Access to key services at settlement zone level – THC • Access to facilities and services information – Scottish Household Survey • Population profiles – THC, Census Information
To promote vibrant and viable neighbour-hoods and townscapes.	Changes in number of households within 10 min walk from greenspace / recreational facilities	Will give an indication of the success of Framework proposals to develop successful places that improve access to recreation and improve urban greenspace provision	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Access to local greenspace, area, number of sites – THC
To protect and enhance greenspace: improve the quality of accessible open space.	Changes in the area of protected amenity and recreational open space	Will give an indication of the success of Framework proposals to develop successful places that improve access to recreation and improve urban greenspace provision	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Access to local greenspace, area, number of sites – THC

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
	Changes in the amount of semi-natural woodland cover	Will give an indication of the success of Framework proposals to develop successful places that improve access to recreation and improve urban greenspace provision	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Access to local greenspace, area, number of sites – THC • Inverness Open Space Audit - Greeninverness
	Changes to the length of cycle and walkways	Will give an indication of the success of Framework proposals to develop successful places that improve access to recreation and improve urban greenspace provision	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Length of cycle / footpath network – THC, greenInverness
	Changes in the number of recreational facilities (indoor and outdoor)	Will give an indication of the success of Framework proposals to develop successful places that improve access to recreation	Target – Increase Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on completion	<ul style="list-style-type: none"> • Access to key services at settlement zone level – THC • Access to facilities and services information – Scottish Household Survey
	Changes to population profile / local life expectancy / mortality causes / road accidents	Changes against existing data/ baselines could indicate healthier living conditions by design	Target – Improve health conditions, reduce accidents, mortality and morbidity Action – Establish baseline data on current situation, record anticipated effects of new development proposals and actual effect on	<ul style="list-style-type: none"> • Years of healthy life expectancy at Highland level – the Highland Wellbeing Alliance • Population profiles – THC, Census Information

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
			completion	
	Projections of population / number of household increases	Monitoring actual increases against projections will help with development phasing in response to demand	<p>Target – Phase development in response to demand to maintain steady population growth and minimise unnecessary development</p> <p>Action – Planning response to development coordination and phasing of appropriate infrastructure provision</p>	<ul style="list-style-type: none"> Population profiles – THC, Census Information

Soil

To manage growth ensuring rural land is minimised, appropriately remediate contaminated sites, conserve soil resources and safeguard prime agricultural land.	Changes in the numbers of local contaminated sites	Will demonstrate either positive or negative effects associated with development	<p>Target – Prevent contamination, remediate and re-use contaminated sites</p> <p>Action – Maintain record of developments improving baseline conditions</p>	<ul style="list-style-type: none"> Areas of contaminated land – THC, SEPA
	Area of prime quality agricultural land affected by new development	Will demonstrate either positive or negative effects associated with development	<p>Target – Maintain most fertile areas and key soil resources</p> <p>Action – Planning response to protect agricultural resources</p>	<ul style="list-style-type: none"> No. of applications affecting prime agricultural land - THC
	Changes in the amount of vacant land	Will demonstrate either increases or reductions	<p>Target – Reduce</p> <p>Action – Planning response to direct</p>	<ul style="list-style-type: none"> Vacant land, properties and derelict land – THC Vacant and Derelict Land Studies

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		associated with development	development	
	Changes in the amount of derelict land	Will demonstrate either increases or reductions associated with development	Target – Reduce Action – Planning response to direct development	<ul style="list-style-type: none"> Vacant land, properties and derelict land – THC Vacant and Derelict Land Studies
	% of new dwellings and re-use of existing buildings on previously developed land	Will demonstrate either positive or negative effects associated with development, especially in utilising brownfield sites	Target – Increase Action – Planning response to direct development	<ul style="list-style-type: none"> No. of brownfield sites – THC Housing Land Audit No. of Greenfield sites – THC Housing Land Audit
Water and climatic factors				
To protect surface and groundwater quality, reduce water pollution to levels that do not damage natural systems.	Changes in length of rivers classified as being of excellent / good quality	SEPA maintain records of local ecological and chemical river quality, changes will demonstrate positive or negative effects associated with development	Target – Maintain or improve local river quality designations Action – Consult with SEPA to identify causes of deterioration, if attributed to development identify remediation processes and apply polluter pays principle	<ul style="list-style-type: none"> Water quality, flood maps / zones, number and severity of pollution events – SEPA;
To maintain water abstraction, run-off and recharge within carrying capacity (including future capacity).	Changes in classification of surrounding bathing waters	SEPA maintain records of bathing water quality, changes will demonstrate positive or negative effects associated with development	Target – Maintain or improve local bathing water quality designations Action – Consult with SEPA to identify causes of deterioration, if attributed to development identify remediation processes and apply polluter pays principle	<ul style="list-style-type: none"> Water quality, flood maps / zones, number and severity of pollution events – SEPA;

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
To maintain and restore key ecological processes, e.g. hydrology, water quality, coastal processes and flood plain development (reduce risk of flooding).	Number of water pollution incidents reported to SEPA	Changes in the number of incidents reported that can be attributed to development processes will demonstrate positive or negative effects associated with development	Target – Reduce Action – Consult with SEPA to identify causes of pollution, if attributed to development identify remediation processes and apply polluter pays principle	<ul style="list-style-type: none"> Wastewater treatment infrastructure – Scottish Water; Local wastewater capacities, projections for increased demand – Scottish Water;
	Number of water courses requiring alteration as a result of new development	CAR Regulations apply restrictions to the number and type of engineering works along water courses to reduce the potential impact of flooding events	Target – Maintain river courses to reduce flooding impacts Action – Planning response to direct development, in consultation with SEPA	<ul style="list-style-type: none"> Water quality, flood maps / zones, number and severity of pollution events – SEPA;
	Areas of development in identified flood plains	Government policy directs development proposals away from identified flood plains, and the Framework recognises the flood plains in and around Inverness and Nairn	Target – Prevent development within identified floodplains Action – Planning response to direct development	<ul style="list-style-type: none"> Water quality, flood maps / zones, number and severity of pollution events – SEPA;
	Change in number / frequency of flooding incidents	Increased rainfall across Scotland could significantly increase the frequency and magnitude of flooding events Records of events and areas affected will help direct future planning to avoid affected areas	Target – Develop detailed record of flooding incidence and areas affected Action – Planning response to direct development	<ul style="list-style-type: none"> Water quality, flood maps / zones, number and severity of pollution events – SEPA;
	Number of new sites developed	There is recognised potential for	Target – Protect coastal areas from potential flooding	<ul style="list-style-type: none"> Land vulnerable to erosion from the sea – Moray Firth

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
	within 500 metres of coast	increased coastal flooding due to sea level rise and increased extreme weather events, that could lead to increased incidence of storm surges	events Action – Planning response to direct development. Coastal developments should include effective appraisals of flooding risks	Partnership, THC, SNH, SEPA <ul style="list-style-type: none"> Number and location of proposed coastal developments – THC
	Changes to local water supply and waste water capacity	Changes to supply infrastructure to meet demand should work to maintain local water quality and reduce overflow/pollution incidents	Target – Improve supply and treatment capacities Action – Planning response to phase development according to demand	<ul style="list-style-type: none"> Wastewater treatment infrastructure – Scottish Water; Local wastewater capacities, projections for increased demand – Scottish Water;
	Number of developments incorporating SUDS	The inclusion of SUDS technologies in new developments will help mitigate the increased risk of flooding and maintain water quality	Target – New developments to include effective SUDS Action – Planning response to ensure effective SUDS provision	<ul style="list-style-type: none"> Wastewater treatment infrastructure – Scottish Water;
	Number of new houses / buildings incorporating water reduction technologies	In accordance with Highland Development Plan Guidance, 'Designing for Sustainability in the Highlands', new developments should include proposals for reducing water demand in domestic and business developments	Target – Reduce water demand through inclusion of appropriate technologies in new developments Action – Planning response to ensure effective appraisal and inclusion of water demand reduction technology	<ul style="list-style-type: none"> Wastewater treatment infrastructure – Scottish Water; Local wastewater capacities, projections for increased demand – Scottish Water;

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
Air and climatic factors				
To promote / increase use of public transport	Convenience of public transport and travel demand by mode	Monitoring changes in demand and convenience will demonstrate effective action associated with increasing public transport provision	Target – Improve uptake of public transport options Action – Planning response to improve infrastructure and accessibility	<ul style="list-style-type: none"> • Convenience of public transport and travel demand by mode – Scottish household Survey • Level of traffic in area – Scottish Transport statistics • Number of visitor attractions accessible by public transport – THC • Proportion of journeys made by 'green' modes – Travel to work statistics • Local carbon dioxide emission rates – THC, SEPA • Local gas and electricity energy use rates (domestic, business, industrial) – NOT IDENTIFIED • Renewable energy production within the A96 Corridor study area – THC • Mode of travel – Scottish Transport statistics, THC • Local readings for PM10 and Nox gases – Inverness monitoring station
To reduce local urban air pollution at identified problem areas.	Changes to frequency / carrying capacity of local public transport services	Monitoring changes in frequency and carrying capacity will demonstrate effective action associated with increasing public transport provision	Target – Improve uptake of public transport options Action – Planning response to improve infrastructure and accessibility	<ul style="list-style-type: none"> • Number of visitor attractions accessible by public transport – THC • Proportion of journeys made by 'green' modes – Travel to work statistics • Convenience of public transport and travel demand by mode – Scottish household Survey
To manage climate change: reduce local GHG emissions associated with development.	Changes to public transport infrastructure	Positive changes in infrastructure (e.g. bus lanes, interchanges) will demonstrate effective action associated with increasing public	Target – Improve uptake of public transport options Action – Planning response to improve infrastructure and accessibility	<ul style="list-style-type: none"> • Proportion of journeys made by 'green' modes – Travel to work statistics • Convenience of public transport and travel demand by mode – Scottish household Survey

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		transport provision		
To promote waste energy conservation through sustainable design and construction: reduce the need for energy and to travel.	Changes to number of local attractions / facilities accessible by public transport	Increases in the number of facilities accessible by public transport will demonstrate effective action associated with increasing public transport provision	Target – Improve uptake of public transport options Action – Planning response to improve infrastructure and accessibility	<ul style="list-style-type: none"> Number of visitor attractions accessible by public transport – THC
	Changes in the concentration and emissions of local air pollutants	Important to demonstrate expected improvements at identified problem areas Important to monitor effects of new routes and road developments within urban areas	Target – Reduce levels of urban air pollution Action – Highland Council should introduce air sampling at upgraded areas to determine effects (positive or negative) Planning response to direct road improvement	<ul style="list-style-type: none"> Local readings for PM10 and Nox gases –Inverness monitoring station Local carbon dioxide emission rates – THC, SEPA
	Changes to traffic levels in bypassed areas and in trunk road length	Reductions in traffic numbers through urban centres in favour of bypass routes will improve local urban air quality and road safety Increases in traffic levels associated with population increase should be monitored to develop future baseline statistics	Target – Reduce levels of urban air pollution, improve local road safety Action – Highland Council should investigate regular traffic surveys on key development areas to determine effects of increased populations	<ul style="list-style-type: none"> Proportion of journeys made by ‘green’ modes – Travel to work statistics Mode of travel –Scottish Transport statistics, THC
	Changes in levels of local CO2 production	No records for local CO2 pollution available for	Target – Produce effective assessment of carbon footprint/	<ul style="list-style-type: none"> Local carbon dioxide emission rates – THC, SEPA

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		<p>baseline assessment</p> <p>Identified need to develop baseline information for future review</p>	<p>CO2 emissions for key development areas</p> <p>Action – Highland Council should investigate means of producing details for A96 Corridor area to demonstrate effects of development over time</p>	
	Number of new developments that utilise energy from renewable sources	<p>Government goal to improve domestic energy efficiency to meet carbon reduction goals</p> <p>Future developments should include effective means of reducing reliance on fossil fuels</p>	<p>Target – UK Government target to reduce CO2 emissions by 60% by 2050</p> <p>Action – Planning response to drive energy efficiency/ demand reduction by design</p>	<ul style="list-style-type: none"> Renewable energy production within the A96 Corridor study area – THC
	Number of local renewable resources	<p>Producing information on local resources and available energy produced/ number of energy users in the area will demonstrate effective action in meeting renewable energy targets</p>	<p>Target – UK Government target to produce 10% of energy from renewable sources by 2010</p> <p>Action – Planning response to drive renewable energy considerations within developments</p> <p>Highland Council should give priority consideration to community heating, microgeneration and other small scale renewable energy options</p>	<ul style="list-style-type: none"> Renewable energy production within the A96 Corridor study area – THC
	Number of new houses / buildings	<p>Increases in energy efficient and sustainable</p>	<p>Target – Increase</p> <p>Action – Planning</p>	<p>Monitoring of No. of buildings with BREEAM certificates - THC</p>

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
	meeting BREEAM standards for sustainable buildings	buildings is a key aim of the Highland Council Development Plan Guidance and will help meet targets as above Recording details will help demonstrate positive action and inform future reviews	response to drive sustainable buildings, energy efficiency and demand reduction	
Material assets				
To respect urban form: value local distinctiveness and improve the quality of the built environment.	Number of affordable housing units provided	To ensure that new developments meet Highland Council targets of 25% provision in areas of identified housing stress Affordable housing units should not be of inferior quality	Target – Increase affordable housing to meet Highland Council target of 25% provision in areas of identified housing stress Action – Planning response to direct development and ensure quality	<ul style="list-style-type: none"> Affordable Housing data from monitoring statistics of local housing strategies
To promote waste recycling, re-use and reduction measures, in accordance with the waste hierarchy, including the re-use and recycling of finite resources.	Changes to levels of aggregate production / amount of aggregates re-used or recycled	Reducing the reliance on primary production produces significant benefits in reducing energy use and climate emissions Records of changing use will demonstrate positive/ negative	Target – Increase recycling/ re-use of aggregates Reduce reliance on primary production Action – Planning response to drive appropriate construction methods that reduce energy demand	<ul style="list-style-type: none"> Municipal waste arisings – THC Area Waste Plan Progress Report Number of recycling / waste handling / landfill facilities – THC Area Waste Plan.

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		associated with development		
	Number of new houses with space provided for segregated waste bins	SEPA recommend planned provision for waste segregation and efficient handling Each new house should have space for 3 segregated bins	Target – Increase segregated waste provision in accordance with Area Waste Plan Action – Planning response to drive accommodation of waste segregation in new developments	<ul style="list-style-type: none"> Municipal waste arisings – THC Area Waste Plan Progress Report
	Number of flats with space provided for segregated waste provision	SEPA recommend planned provision for waste segregation and efficient handling Flatted developments should have space for communal segregated waste	Target – Increase segregated waste provision in accordance with Area Waste Plan Action – Planning response to drive accommodation of waste segregation in new developments	<ul style="list-style-type: none"> Municipal waste arisings – THC Area Waste Plan Progress Report
	Number of developments incorporating green waste management facilities	SEPA recommend planned provision for waste segregation and efficient handling Green waste management includes composting facilities	Target – Increase green waste facilities in accordance with Area Waste Plan Action – Planning response to drive accommodation of green waste management in new developments	<ul style="list-style-type: none"> Municipal waste arisings – THC Area Waste Plan Progress Report
	Change in number of recycling facilities provided within area	SEPA recommend planned provision for waste segregation and efficient handling New development areas should include recycling	Target – Increase recycling facilities in accordance with Area Waste Plan Action – Planning response to drive accommodation of recycling facilities in new	<ul style="list-style-type: none"> Number of recycling / waste handling / landfill facilities – THC Area Waste Plan.

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
		facilities close to source	developments	
	Change in total amount of waste sent to landfill	Increasing populations will result in increased waste production and increased waste to landfill Monitoring changes in levels sent to landfill will demonstrate effective action in managing population growth if other waste management provision is effective	Target – Reduce waste to landfill per capita Action – Planning response to ensure effective waste management provision in new development aids reduction targets	<ul style="list-style-type: none"> Municipal waste arisings – THC Area Waste Plan Progress Report
Historic environment / cultural heritage				
To protect and where appropriate, enhance the historic environment.	Number and area of developments affecting Conservation Areas	Maintaining a record of development applications affecting Conservation Areas will demonstrate positive action in maintaining the historic environment and in providing evidence for future reviews	Target – Maintain historic environment Action – Planning response to direct development that respects and maintains the character of Conservation Areas	<ul style="list-style-type: none"> Number, area and locations of historic buildings / archaeological sites – Historic Scotland, THC
	Number and area of protected sites or listed features that	Maintaining a record of development applications affecting	Target – Maintain historic environment Action – Planning response to direct	<ul style="list-style-type: none"> Number, area and locations of historic buildings / archaeological sites – Historic Scotland, THC

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
	are affected by development	protected sites/ listed features will demonstrate positive action in maintaining the historic environment and in providing evidence for future reviews	development that respects and maintains the integrity, character, landscape and historic settings of protected sites and listed features	
Landscape				
To manage the character and appearance of the landscape and townscape, conserve scenic areas, protect and enhance landscape value, particularly designated areas, strengthening local distinctiveness and sense of place.	Changes to landscape character	Effects upon landscape character should be a key consideration of any detailed development proposal Maintaining a record of development impacts and changes to Landscape Character Assessments will demonstrate positive action for review	Target – Maintain high quality landscapes Improve landscape where possible Action – Planning response to limit development that negatively impacts landscape quality Planning response to encourage proper consideration of landscape effects	<ul style="list-style-type: none"> Landscape character assessments / designations – THC, SNH
	Changes in area of woodland cover	Monitoring increases or reductions in woodland areas associated with development will allow early compensatory or enhancement measures to be implemented Maintaining a record of such changes in the A96 Corridor will	Target – Increase Action – Planning response to ensure effective assessment of landscape impacts and inclusion of compensatory/ screening measures where appropriate	<ul style="list-style-type: none"> Historic Land Use Assessments – Historic Scotland, SNH

SEA Objective	Monitoring Proposed	Rationale	Targets and Actions	Potential Data sources
	Changes in habitat connections – area of new planting (eg. trees/ hedgerows)	<p>effective action for future review</p> <p>Improvements to landscape possible by appropriate screening/ soft landscaping such as tree planting with associated benefits for wildlife</p> <p>Maintaining a record of such changes in the A96 Corridor will demonstrate effective action for future review</p>	<p>Target – Increase</p> <p>Action – Planning response to ensure effective assessment of landscape impacts and inclusion of compensatory/ screening measures where appropriate</p>	<ul style="list-style-type: none"> • Historic Land Use Assessments – Historic Scotland, SNH

Table 3 - Monitoring of SEA Objectives

Conclusion

We believe the SEA process has been a great help in developing the A96 Growth Corridor Development Framework. Clearly there are a number of areas which require further assessment and work on over the course of 2008 and 2009 during preparation of the Local Development Plan. A new Strategic Environmental Assessment will be prepared to inform that process.