

Appendix 1 – Response to Environmental Report Comments

Historic Scotland

Comment	THC Response
<p>Vision/Strategy and Policy Assessments The assessments of the preferred vision and policies and their reasonable alternatives is clearly laid out in Appendix 4 of the Environmental Report and we are content to agree with the scorings for these assessments.</p>	Noted.
<p>Influence of SEA on each settlement This summary outlining the influence of the assessment on the spatial strategy decision making process is particularly welcome.</p>	Noted.
<p>General comments on Spatial Strategy The rigorous approach to the assessment of the spatial strategy is welcome. A clear understanding of the historic environment baseline is evidenced and it is particularly welcomed that this understanding has been brought through to the discussion of settlement context that is contained within the Main Issues Report itself.</p>	Noted.
<p>As we have previously discussed the framework utilised for the site allocations assessments does have one disadvantage in that the assessment criteria discusses both setting and access but does not allow for a +/- score. This has led to a number of assessment scores that we do not agree with. I note that the assessment question 16h relates to the historic environment. When updating the Environmental Report at Proposed Plan stage you may wish to use this question to consider access while solely considering the relative impacts on historic environment assets and their setting through assessment questions such as 16a. This would enable the assessment to more accurately reflect the impacts on setting and access.</p>	<p>The assessment criteria was agreed with the Consultation Authorities and whilst it has become apparent through doing the assessments that a +/- score would be useful, the assessment database has been created. This comment has however been noted and West Highland and Islands LDP has taken this on board and included a +/- score in their site assessment scoring.</p> <p>The use of questions 16a and 16h is noted.</p>
<p>Edderton ET01 As noted in the assessment, this allocation contains the scheduled monument Carr Blair stone circle and cist. Given the issues</p>	Pre-mitigation score has been changed to “- -“. Mitigation now includes a requirement for sensitive access to site, with post mitigation score changed to “-“ to reflect the impact of development on setting.

<p>associated with accessing this site we consider that the site should be scored as a significant negative effect prior to mitigation, with the delivery of appropriate mitigation lessening this impact.</p>	
<p>Edderton ET03 We consider that the scoring for this site prior to mitigation should be for a significant negative effect. The mitigation outlined within the assessment of the impact on the setting of the scheduled Clach Chairidh symbol stone is particularly welcomed and should serve to mitigate the significance of the effect to one that is minor negative in nature. We would therefore disagree with the post mitigation scoring of a positive effect. The positive element of an improvement of access to and interpretation of the site is notes and would therefore agree with the scoring at 16h. However, we consider that the scoring of 16a should reflect questions of setting (as access and interpretation are dealt with by 16h) and while accepting that the mitigation will lessen the setting impact it cannot be seen as a positive impact against the monuments current setting.</p>	<p>Pre-mitigation score has been changed to “- -“. Post mitigation score changed to “-“ to reflect the impact of development on setting.</p>
<p>Wick WK24 This allocation contains the scheduled monument The Pap, broch 350m E of Hillhead (Index no.578). We consider that the assessment should score the development of this site as a significant negative effect prior to mitigation. The appropriate delivery of the mitigation outlined in the assessment should serve to lessen this impact but we would not agree that this should be considered to be positive. As in the comments above relating to Edderton ET03 an improvement of access does not mitigate setting impacts.</p>	<p>Pre-mitigation score has been changed to “- -“. Post mitigation score changed to “-“ to reflect the impact of development on setting.</p>
<p>Wick WK27-28 Given the proximity of the scheduled broch discussed above we consider that the assessment provided for these two sites should mirror that of WK24.</p>	<p>Pre-mitigation score has been changed to “- -“. Post mitigation score changed to “-“ to reflect the impact of development on setting.</p>

SNH

Comment	THC Response
<p>Main Report Page 18 – Landscape table – it would be informative (as for nature conservation areas) if the % extent of the plan area covered by these features was added as a column (i.e. NSAs – 23.8%; SLAs – 20.0%; Wild Land Areas – 49.0%).</p>	Noted and included.
Page 20 – for landscape, the implications for CaSPlan of the existing environmental problem of attrition of wild land and wildness qualities is not discussed. Development plans should identify and safeguard the character of wild land areas (SPP, para 200).	Noted and included.
Pages 21-22 and 25-29 – it is rather unclear why only a few of the main issues (preferred approach and alternatives) are discussed or assessed here. Issues 2a, 2b (i) (managing new growth), 2c, 2d, 3, 5 and 6a are not discussed or assessed; although for some of these, no alternative is identified. Issues 3 however (Economy) does have alternative approaches.	<p>We took the approach of only assessing policies and policy tools and their alternatives. The other chapters (issues) are there to embellish the thinking behind the vision and spatial strategy and therefore are covered by the assessments for the vision.</p> <p>The revised ER will however include an assessment for the hinterland boundary policy tool.</p>
Page 24 – the table of SEA Objectives and Site Assessment Questions appears not to match the numbering used in Appendix 6. We think for our interests it should read as follows – SEA Objective 1 (Biodiversity, flora and fauna) - 5a, 5b, 5c, 5d, 5e, 5g SEA Objective 2 (Population and Human Health) (re open space, paths and green network) – 10a, 10b, 10c, 10d, 10e SEA Objective 3 (Soil) (re carbon rich soil and geodiversity) – 5f, 12a SEA Objective 8 (Landscape) – 14a, 14b, 15a, 15b	This has been corrected.
Pages 33-35 Summary of Site Assessment Findings – please see our detailed comments under Appendix 6 below for some other instances where we think a significant negative effect pre-mitigation could be identified.	Noted.
Page 38 – the discussions of how SEA has influenced site selection for each settlement is very welcome. We suggest the discussion for Lochinver would be worth expanding to include LV03 and LV07, given the effects on the environment that development of these sites raises.	The discussion of each settlement has been updated to reflect the allocations identified in the Proposed Plan.

Page 42 – Monitoring – Biodiversity – there should also be monitoring of any loss of woodland and the degree to which (in accordance with Control of Woodland Removal Policy) this is matched by compensatory planting. If the green network is identified for the East Coast Settlements and for Thurso/Wick (existing and aspirational), monitoring can include the impact of development on the green network, e.g. any fragmentation or any improvement of connectivity.	The monitoring section has been updated to reflect a more pragmatic approach to monitoring.
Page 43 – Monitoring – Soil – any development on carbon rich soil should also be monitored.	The monitoring section has been updated to reflect a more pragmatic approach to monitoring.
Page 45 – Monitoring – Landscape – any development in Wild Land Areas should also be monitored.	The monitoring section has been updated to reflect a more pragmatic approach to monitoring.
Appendix 1 – How earlier comments have been taken into account No comments.	Noted.
Appendix 2 – Baseline data, information and maps Biodiversity, flora and fauna – baseline environmental information on protected species – reference to the SNH website could more specifically refer to the interactive map on SNHi – http://www.snh.gov.uk/publications-data-and-research/snhi-information-service/map/	Included
Maps of Marine Protected Areas and designated seal haul-out sites can now be added (the latter is listed under Landscape, but would more appropriately be listed here).	Information added.
Soil – spatial data on carbon rich soil, deep peat and priority peatland habitat will shortly be available (primarily to inform wind energy spatial frameworks) – see – http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soilsand-development/cpp/	Noted
Landscape – Descriptions Reports for Wild Land Areas will be available in due course, so reference can then be added to these.	Noted.
Appendix 3 Outline of vision, spatial strategy and general policy approaches See comment under Appendix 4.	Noted
Appendix 4 – Vision/Strategy and Policy Assessments	We took the approach of only assessing policies and policy tools and

<p>As already noted, it is unclear why only some of the issues and options are assessed here. It would be helpful if the reason for this could be provided. Issue 3 for example ('How should CaSPlan support a strong and diverse economy?') would appear to warrant assessing, given that the preferred approach includes the Council potentially considering suitable marine renewables proposals on non-allocated sites, and given that one of the alternatives is not to allocate business land, but to allow business to locate and expand wherever they feel is best, guided only by HwLDP policies.</p>	<p>their alternatives. The other chapters (issues) are there to embellish the thinking behind the vision and spatial strategy and therefore are covered by the assessments for the vision.</p>
<p>Appendix 5 – Cumulative Assessment In terms of this cumulative assessment, and the scenario of 100% take-up of allocated sites, it may be worth considering Dornoch in particular. This settlement is adjacent to a number of protected areas (NSA, SAC, SPA/Ramsar). However we appreciate that cross-reference is made here to the eventual Habitats Regulations Appraisal of the plan, which will consider in-combination effects as regards European sites.</p>	<p>The comment is welcomed and we have continued to use the same cumulative assessment approach.</p>
<p>Appendix 6 – Settlement Assessment General - the answers to Q5g do not relate to habitat connectivity, although the analysis does.</p>	<p>It is noted that the answers do not relate to habitat connectivity however this was spotted after the matrix had been finalised. For Q5g the scoring has been completed in the knowledge that the accompanying text is incorrect. The comments and mitigation do however relate to habitat connectivity. This error has been noted by the Development Plans Team and has been corrected for future use of the assessment matrix in other LDPs.</p>
<p>Brora BR10 (non-preferred) – Q10e – the '+' score for green networks is unclear, as there is no commentary/mitigation text.</p>	<p>The post mitigation score has erroneously been put where the mitigation comment should be. The mitigation comment which should have been shown is: "Provide path linking into adjacent roads/paths".</p>
<p>Brora BR11 (non-preferred) – Q10a/b – re open space this is scored '0' but given the MIR indicates a (non-preferred) use of housing, and given from a desk appraisal this appears to be an amenity area, a '-' or even '- -' score would have been expected.</p>	<p>The pre and post mitigation score has been changed to "- " in recognition of the potential loss of open space if site is used for housing.</p>
<p>Castletown CT01/03 – Q12a – here it says that the site is in an area of blanket peat coverage, but this should be checked for accuracy, as it is not included in the draft SNH carbon-rich soil map.</p>	<p>The pre and post mitigation score has been changed to "- " in recognition of the mistake.</p>
<p>Castletown CT12 (non-preferred) – Q5d – re woodland this site appears</p>	<p>Pre mitigation scored changed to "- -" and post mitigation to "- " as site</p>

from a desk survey to be wholly within inventoried woodland, which would indicate a '- -' rather than a '-' score.	wholly within inventoried woodland.
Castletown CT04 – Q10b – re open space provision it is unclear why this is scored '++' as opposed to '+' (as in the case of CT01) – do the proposed masterplans of these two potential large allocations differ in their open space requirements?	Pre-mitigation changed to “+”
Castletown CT05 – Q5e – given reference in Q5d to possible felling of large mature trees, a bat survey may be required.	“Bat survey may be required” added to mitigation. And Pre-mitigation score changed to “-”.
Castletown CT11 (non-preferred) – Q5c and Q5f – given location of this site wholly within Dunnet Links (geological and biological) SSSI, a '- -' rather than a '-' (5c) and '0' (5f) score would have been expected.	Q5c. Pre and post mitigation scores changed to “- -” to reflect impact on designations Q5f. Pre and post mitigation scores changed to “-” to reflect potential geological impact
Dornoch DN01 and DN09 – Q5b – given proximity to several Natura sites, a '-' score pre-mitigation rather than '0' would seem more logical, pointing to the need for further assessment as part of the HRA (as has been done for other housing sites in Dornoch).	Pre-mitigation score changed to “-” for both sites.
Edderton ET03 – Q15a – this is scored '-' pre-mitigation and '0' post-mitigation but no mitigation is set out to result in this; presumably it is the same mitigation as for Q15b.	Q15a has been given the same mitigation as Q15b to explain in the change in score between pre and post mitigation.
Golspie GP03 – Q15a – this question re landscape character is scored as '+' pre-mitigation but it is then noted that it is included in an area in the Sutherland Housing Landscape Capacity Study that is unlikely to be suitable for development due to value of scenic resource. It would seem more logical for the pre-mitigation score (as for Q15b) to be '-', with mitigation at best leading to a '0' score.	Scoring changed to “-” pre mitigation and “0” post mitigation..
Golspie GP09 (non-preferred) – Q5e – re protected species there is a typo here – the reference to the coast and watercourse and hence the need for an otter survey is put under Q5f (geodiversity).	Typo noted and amended.
Golspie GP10 (non-preferred) – Q10a/b – given this site would result in loss of an open space area zoned in the current Sutherland Local Plan, a '- -' rather than a '-'/'0' score for these questions re open space would have been expected.	Scoring changed to “- -”
Halkirk HK01 – Q5b – this omits to refer to proximity to River Thurso	HK Q5b. Scoring changed to “-” pre mitigation and “0” post mitigation.

<p>SAC – it should be scored as ‘-‘ given need for safeguarding of water quality; Q5e – this also omits to consider location adjacent to a river, so need for otter survey should be noted; Q5g – also given adjacency to river, habitat connectivity should be considered, with mitigation being a buffer zone between housing and the river environs. We suggest assessment for these three factors should be as for HK03 (although we note it already has a live planning permission).</p>	<p>Q5e. Pre mitigation score changed to “-“ and otter survey added to mitigation.</p> <p>Q5g. Pre mitigation score changed to “-“ and buffer zone added to mitigation.</p>
<p>Halkirk HK07 (non-preferred) – Q5f – it is unclear why this site has been scored as ‘++’ for this question re geodiversity. We suspect this is a typo, and it should be ‘0’ instead; Q12a re carbon-rich soil is marked as ‘not applicable to type or location of development’, which does not seem appropriate given location to south of Halkirk.</p>	<p>Q5f. Pre and post mitigation scores changed to “0”</p> <p>Q12a. Pre and post mitigation scores changed to “-”</p>
<p>Halkirk HK04/05/06 – Q5b – given relative proximity to River Thurso SAC this should be marked as ‘0’ rather than ‘X (N/A)’.</p>	<p>Q5b Pre and post mitigation scores changed to “0”</p>
<p>Helmsdale HD05 – Q15b – this question re visual impact is marked as ‘X’ (N/A) but this is presumably a typo because the MIR notes development here could impact on key amenity views. Hence a ‘-‘ or even a ‘--‘ score would have been expected for this (alternative housing) site re visual impact.</p>	<p>Q15b Pre mitigation score changed to “-“ and comment notes the potential for development to impact amenity views. Post mitigation score changed to “0” and mitigation added: “Any development would require careful consideration of the important amenity views from Simpson Crescent through careful siting, design and landscaping to minimise visual impacts.”</p>
<p>Lairg LA06 – Q12a – this question re carbon-rich soil is scored as ‘X’ (N/A) but this does not seem appropriate for this (greenfield housing) site, unless an explanation is added.</p>	<p>Scoring has been changed to “0”</p>
<p>Lochinver LV01, LV02, LV08 – Q5e – this question re protected species is answered ‘N/A no designations apply’, which seems inappropriate – for other sites this question is answered with a phrase like ‘0 – unlikely to be any impact on protected species’.</p>	<p>Scoring has been change to “0”</p>
<p>Lochinver LV03/LV09 – Q5c – the text here refers to the NSA, whereas this question relates to any impact on SSSIs (NSAs are covered by Q14a); Q5d – from the aerial photograph, it would appear that there is woodland adjacent to the Canisp Road at the western end of this area – this should be considered as part of this question, along with the semi-natural habitat generally of this large area, e.g. retention of trees as much as possible should be included</p>	<p>Q5c score changed to “N/A”</p> <p>Q5d score changed to “-“ pre-mitigation to account for NWSS native wood, and with mitigation post-mitigation score is “0”</p> <p>Q12a pre-mitigation score “--“</p> <p>Q14a/ 15a/ 15b mitigation now includes ‘avoiding areas of higher ground’ and ‘retaining as much woodland as possible to screen development’</p>

<p>as mitigation; Q12a – much of (non-preferred) site LV09 is carbon-rich soil on the draft SNH map, so given size of site could be scored ‘-’ rather than ‘-’; Q14a – although mitigation refers to scaling back the development to focus on the area closest to Lochinver, the SE part of (preferred site) LV03 in the MIR appears to go onto higher more rugged ground, thus making it less apparent that the original ‘-’ score re impact on the NSA can at this stage be adjusted to ‘0’; Q14b – Canisp Road leads to a Wild Land Area some 2km to the east of (non-preferred) LV09, and so a ‘-’ score seems more applicable than ‘0’; Q15a and 15b – see comments under Q14a – again if the SE part of (preferred site) LV03 in the MIR does indeed include higher more rugged ground, it does not seem that mitigation is sufficient at this stage to reduce the ‘-’ score to ‘0’ in terms of landscape character and visual impact. There is also no mention as mitigation here of retention of trees as much as possible to screen any new housing.</p>	<p>Q14b comment now acknowledges the proximity to a wild land area.</p>
<p>Lochinver LV04 – Q5e – an otter survey should be added as mitigation, to move a ‘-’ score to a ‘0’ score post-mitigation.</p>	<p>Score adjusted and mitigation updates</p>
<p>Lochinver LV07 – Q15a – we suggest this should be scored ‘-’ initially, given impact on local landscape character of any woodland removal here, with mitigation added as for other questions (e.g. Q14a) to bring score up to ‘0’.</p>	<p>Score adjusted</p>
<p>Lybster LY01/LY02 – Q5b – this is scored as ‘X (N/A) No designations apply’, but consideration should be given to East Caithness Cliffs SPA and SAC (this can be picked up as part of the HRA of the plan).</p>	<p>Score adjusted to “0” and comments now acknowledge SPA and SAC</p>
<p>Lybster LY04 (non-preferred) – Q5e – given this is an old church building, a bat survey may be required.</p>	<p>Comments and mitigation updated to reflect potential for bat presence</p>
<p>Lybster LY06 (non-preferred) – Q5b – this site includes part of East Caithness Cliffs SAC and SPA. We agree it should be scored ‘-’ pre-mitigation. However in the absence of setting out what any mitigation would be at this stage (apart from setback from cliffs), we consider it is premature to then score it as ‘0’ post-mitigation. If this site is changed from non-preferred to preferred in the preparation of the Proposed Plan, this will need careful further consideration as part</p>	<p>Site remains non-preferred, but post-mitigation scoring amended to “--”</p>

<p>of the HRA of the plan; Q5c – Dunbeath to Sgaps Geo SSSI is protected for maritime cliff vegetation – as for the SAC and SPA, given that this site intrudes into the SSSI it should be scored ‘- -’ pre-mitigation.</p>	
<p>Lybster LY07/LY08/LY09 (non-preferred) – Q5b – rather than mark this as ‘N/A no designations apply’, mention should be made of East Caithness Cliffs SAC and SPA; Q5e – given proximity of watercourses (especially re LY09) an otter survey could be required.</p>	<p>East Caithness Cliffs SAC and SPA and otter survey included in comments and mitigation.</p>
<p>Thurso TS04 – Q5c – this is scored ‘0’ because the site is downstream of Newlands of Geise Mire SSSI. However we believe that ground water in this area is linked to the SSSI (which is a ground water dependent wetland). Therefore there is connectivity between TS04 and the SSSI, which should be reflected in the SEA. Hence we advise a ‘-’ or even a ‘- -’ score would be more appropriate, with mitigation identified to be taken across to the Proposed Plan. Such mitigation could be preparation of a Groundwater Protection Plan to accompany any planning application to demonstrate no adverse effect on the SSSI; Q5e – the aerial photograph indicates that the southern part of this site includes less-managed land (noted as heather moorland in the Environmental Report) than the northern part. A species survey should therefore be added as mitigation. This should include an otter survey, given the burn that runs through the site.</p>	<p>Q5c. Pre mitigation score changed to “–” and “Preparation of a Groundwater Protection Plan to accompany any planning application to demonstrate no adverse effect on the SSSI” added to mitigation.</p> <p>Q5e. Pre mitigation score changed to “–” and “Species survey may be required. This should include an otter survey, given the burn that runs through the site.” added to mitigation.</p>
<p>Thurso TS10 – Q5b – given this site is just 80m from the River Thurso SAC across open ground (and not downstream of the SAC as stated in the SEA) we consider this question should be scored as ‘-’ rather than ‘0’ pre-mitigation, and then with standard pollution prevention measures for mitigation to score it as ‘0’.</p>	<p>Pre mitigation score changed to “–” and standard pollution prevention measures added to mitigation.</p>
<p>Thurso TS12 – Q5b – given this site is adjacent to the River Thurso, albeit just downstream of the SAC, rather than adjoining the designation as stated in the SEA, as well as connection to the public sewer, another mitigation measure should be avoidance of sediment</p>	<p>“Avoidance of sediment or pollution run-off” added to mitigation.</p>

or pollution run-off.	
<p>Thurso TS13 – Q5b – given proximity to River Thurso SAC (immediately upstream of the site) we suggest this is scored ‘-’ pre-mitigation rather than ‘0’, with measures such as connection to the public sewer, SUDS and avoidance of siltation/pollution run-off noted as mitigation, to result in the ‘0’ score post-mitigation.</p>	<p>Pre mitigation score changed to “-“ and suggested mitigation added.</p>
<p>Thurso TS05 – this appears to be missing (with TS20 included twice).</p>	<p>TS05 ‘Land West of Bishops Drive’ – was assessed together with TS01 and TS03. The sites were included as part of the Environmental Report. They form part of groups and the full site name may not have been visible.</p> <p>TS20: Land North of Scrabster Mains Farm should have been numbered TS19. This mistake has now been corrected.</p>
<p>Tongue TG01 – Q5e – re protected species, given (from a desk appraisal) trees, scrub and small watercourse on this site, we consider this should be scored ‘-’ pre-mitigation, with the requirement for a species survey and mitigation plan if necessary resulting in the ‘0’ score post-mitigation.</p>	<p>Mitigation updated to include species survey and mitigation plan</p>
<p>Tongue TG05 (non-preferred) – Q14a, Q15a and Q15b – re these questions on NSA, landscape character and visual impact, it says that this site would not significantly extend the built area of Tongue. However it also says that the majority of the site is outwith the Settlement Development Area. The MIR also states that this site would result in sprawl of housing development into the surrounding countryside, and is disconnected from the existing settlement. We therefore consider the text here should be amended to be clearer about negative landscape effects.</p>	<p>Comments and mitigation updated to clarify.</p>
<p>Tongue TG06 – this appears to be missing.</p>	<p>Site TG06 is built out and was included in the MIR in error.</p>

Wick WK25 and WK34 – Q5e – both pre- and post- mitigation scores are '0', but mitigation is included re need for protected species survey and mitigation plan if needed, because of features such as watercourses and old buildings. We suggest in order to highlight this mitigation that the pre-mitigation score should be amended to '-'.	Pre-mitigation score changed to “-“ as suggested.
Wick WK07 Sites at South Head – Q5g, Q15a, Q15b – it is unclear how the assessment considers possible effects on the whole shoreline area from say Salmon Rock to South Head. The aerial photograph indicates this is relatively natural, with paths as well as the former quarry road. The assessment could be more cautious pre-mitigation as regards habitat connectivity, landscape character and visual impact, as well as noting the negative effect on protected species (otter), open space and paths. Given this part of the site is presently zoned for amenity in the Caithness Local Plan, with proposals for enhanced recreation, the assessment of harbour-related industrial use should consider how this will be compatible (especially as this is not spelt out in the MIR).	Suggested amendments have been made to Q5g (impact on habitat connectivity), 15a (landscape) and 15b (visual impact).
Wick WK22 – Q5g – the minor watercourse through the centre of the site provides a focus for a habitat corridor and maintenance of connectivity to the south; this is not reflected in the assessment ('0') and we suggest a '- ' score is given pre-mitigation, with the '0' score being post-mitigation (i.e. protection for watercourse and its corridor, to be part of the green network of the area).	Suggested amendments have been made to Q5g
Wick WK01, WK05, WK09, WK12 and WK31 – these appear to be missing.	The sites were included as part of the Environmental Report. They form part of groups and the full site name may not have been visible.
Appendix 7 – Site Assessment and SEA Checklist No comments.	Noted.

SEPA

Comment	THC Response
<p>General Comments We consider that the main ER document provides a good summary of the detailed assessments which have been carried out. The use of clear tables, such as those used to explain the relationship between the SEA Objectives and Site Assessments and the table on pages 33-35 highlighting the significant effects for the site assessments are especially useful.</p>	Noted.
<p>We are content with the range of alternatives that were considered and the assessment of them.</p>	Noted.
<p>We are also generally in agreement with the results of the site assessments, although there is some slight inconsistency in how different sites are scored and we think there are some sites where effects were maybe missed.</p>	For the Revised ER we will try to ensure that any inconsistencies in scoring are rectified and that all effects are noted and mitigation provided as appropriate.
<p>Our detailed comments below concentrate on the assessments themselves and proposed mitigation measures, all of which should be brought forward into the Plan. Further more detailed comments are also provided for you to consider in your revised ER.</p>	Noted.
<p>Assessment of the Vision and Policies We agree with the assessment of the preferred vision that it can at best only have mixed effects on the environment as it does not make either explicit or implicit reference to issues such as soil, land, waste and water. We note that the proposed mitigation is that the Vision be revised when the Plan is next revisited in 2012. However, as outlined in our response to the MIR, now that you have identified this limitation we would encourage you to take steps to address it now.</p>	The vision and outcomes have been revised following comments from the MIR consultation and the SEA assessments have been revised accordingly.
<p>We generally agree with the assessments for the Policies and Special Landscape Areas and their alternatives.</p>	Noted.
<p>Cumulative Assessment</p>	Noted.

<p>Assessing cumulative effects is difficult and we consider your approach of comparing different development rates an interesting way of doing so. We are content with the assessments presented.</p>	
<p>Assessment of Sites We welcome the detailed assessments carried out of preferred, alternative and non-preferred sites and as outlined above are generally content with the assessment. All the mitigation measures outlined in the assessments should be brought forward into the Plan.</p>	<p>Noted.</p>
<p>Below we have provided some assessment-specific and site-specific comments where we think there is value in doing so. We highlight that sites CT07, TS05, TS19, WK05, WK09 and WK12 do not seem to have been assessed.</p>	<p>The sites were included as part of the Environmental Report. They form part of groups and the full site name may not have been visible.</p> <p>TS20: Land North of Scrabster Mains Farm should have been numbered TS19. This mistake has now been corrected.</p>
<p><u>Q1b - direct physical impacts on water environment</u> We generally agree with the assessments presented and welcome the mitigation measures when they are outlined. There are a number of sites however where the following issues were noted and could be considered further:</p> <ul style="list-style-type: none"> • Comments are made about potential pollution issues (i.e. in relation to foul drainage) or flood risk rather than concentrating on direct physical impacts; • Smaller watercourses run through the site or they are adjacent to water features and are identified as not having an effect, where we would consider that a pre-mitigation score might better relate to a potential localised negative effect. In some cases, such as WK22 in Wick, we would suggest that specific mitigation will be required to achieve a neutral post mitigation score; • Where watercourses have already been straightened opportunities exist to enhance the water environment by re-engineering the watercourses to give them a more natural course. This could result in a positive post-mitigation score. Examples are LA03 in Lairg and TS05 (not assessed) in 	<p>Noted.</p> <p>WK22 changed to include suggested amendments.</p> <p>Post mitigation score for LA03 has been changed to “+” and mitigation added.</p> <p>Suggested amendments made to TS05.</p>

Thurso.	
<p><u>Q1c - existing water supplies within 250m</u></p> <p>We highlight that WK21 in Wick does not identify the use of the watercourse at the boundary of the site for water supply for the nearby distillery. Appropriate mitigation should be outlined.</p>	Suggested amendments made to WK21.
<p><u>Q3a - flood risk</u></p> <p>As outlined in our response to the MIR, while you have not carried out a separate Strategic Flood Risk Assessment (SFRA), the assessments you have carried out addressed many of the requirements of an SFRA. You could therefore have made your text on page 15 more positive in this regards.</p>	This section of the report has been revised to reflect how SFRA has been addressed in the ER.
<p>We agree with the individual assessments outlined. There are a couple of very minor anomalies where some sites which could be at risk of flooding have been scored as zero before mitigation.</p>	Where a site may be at risk of flooding the score before mitigation has been changed to “-“
<p><u>Q9b - Connection to public water supply and waste drainage</u></p> <p>We agree with the assessments outlined which suggest that nearly all allocations put forwards in the MIR can easily connect to public water and sewerage infrastructure.</p>	Noted. There is a statement in the Proposed Plan that all allocations should connect to the public sewer.
<p>We note and agree that in Lochinver sites LV03 and LV09 could not easily connect to the existing system and welcome the mitigation measures outlined - this mitigation should be included in the Plan. The use of site LV07 is not absolutely clear and as a result the currently proposed choice of mitigation seems reasonable, but as you will note from our response to the MIR we would like to discuss this further.</p>	There is a statement in the Proposed Plan that all allocations should connect to the public sewer.
<p>A number of sites (mostly in Castletown, Halkirk, Thurso and Wick), do not include any mitigation, which in this case we consider should be a statement in the Plan which identifies that all allocations in the Plan should connect to public infrastructure, as is proposed elsewhere in the ER.</p>	There is a statement in the Proposed Plan that all allocations should connect to the public sewer.
<u>Q11a - use of brownfield land</u>	

<p>There are a number of sites in Castletown (and a few elsewhere) where it is not clear why they have been scored as zero as the scale or type of development unlikely to effect brownfield land. It would seem to us that they should have been scored "X - N/A no brownfield land on site".</p>	<p>Site assessments in Castletown have been amended.</p>
<p>Note in the amended Summary of Effects table site LA01 should be scored as significantly positive before mitigation.</p>	<p>The site assessment for LA01 gave “++ve” score pre and post mitigation for Q11a however the scoring shown in the table on page 33 of the Environmental Report was incorrect. This mistake was rectified post publication and an errata table was published showing the “++ve” scoring.</p>
<p><u>Q11b - contaminated soils</u></p> <p>There are a couple of sites in Tongue, and elsewhere where the question has been answered as “?? Unknown” but the reason for this is unclear. In most of these cases the assessment suggests the sites are greenfield with no previous use and as a result we would have thought that “no contamination present” was a more appropriate response.</p>	<p>At the time of doing the site assessments for the ER we did not have information on all sites from the Contaminated Land Unit so the answer was “unknown”. This information has now been provided and assessments amended as necessary.</p>
<p>In addition it is not clear why the scale or type of development at some sites, such as CT05 (allocated for mixed use) in Castletown and HK05 and HK06 in Halkirk (allocated for housing), would be unlikely to affect contaminated land. We presume the pre-mitigation score should have been that there was or was not potentially contaminated land on site.</p>	<p>The neutral score was being used for these sites, unfortunately the fixed response in the drop down menu in our database for neutral was not an appropriate form of words.</p>
<p>We presume that the pre-mitigation score for site WK14 should have been negative.</p>	<p>It is negative.</p>
<p><u>Q11c - loss of greenfield land</u></p> <p>There are a small number of assessments which are scored to state that the scale or type of proposal means that it's unlikely to result in a loss of greenfield land, however it seems that “no greenfield land” or “small sale use of greenfield land” would be more appropriate. Examples include TS06, TS10 and TS12 in Thurso, all of which are proposed for mixed use.</p>	<p>TS06 has already been noted as having a negative impact on the greenfield land.</p> <p>TS10 and TS12 have been changed to take account of suggested amendments.</p>
<p><u>Q12a - disturbance of carbon rich soils and wetlands</u></p>	<p>Noted.</p>

<p>You will note from our response to the MIR there are a couple of additional sites where we consider impacts are likely.</p>	
<p><u>Q13a - meeting Zero Waste Plan targets</u></p> <p>We are pleased to note that it has been identified that a number of larger allocations, such as DN01 in Dornoch and LA01 in Lairg, could include recycling facilities. We note that there are a number of allocations in Dornoch where it is thought that facilities could be included, but for example, none in Wick. If you have not done so already you may wish to consider discussing each settlement with your waste colleagues and deciding (1) whether additional collection facilities are required for the settlement and (2) if so, where should they be located.</p>	<p>Noted</p>
<p><u>Q13b - minimise demand for primary resources</u></p> <p>We note that this question has mainly been answered to suggest that development is unlikely to have any significant impact on demand for natural resources. However there are some sites, such as HD03 and HD05 in Helmsdale, where it is thought that the development will result in an increase used of primary resources. The reasons why these sites are different in not clear. In retrospect perhaps this question would benefit from some additional guidance on how it should be scored or alternatively it could be one which is removed from the suite.</p>	<p>This question has been revised for West Highlands and Islands LDP SEA site assessments, taking on board the comments received through CaSPlan.</p> <p>Sites HD03 and HD05 revised to be consistent with the approach taken by the CaSPlan team.</p>
<p><u>Q13c - proximity to waste management sites</u></p> <p>We note that for every allocation this question has been answered to say that there are no waste management facilities nearby. However note that site WK05 in Wick, which as not assessed, is the current location of a Highland Council's recycling centre.</p>	<p>Reference made to recycling centre on WK05. Pre and post mitigation scores have been changed to '0' instead of 'X'.</p>