G-S/594/CP

28th April 2011

By email only

Dear Sirs,

Inner Moray Firth Local Development Plan Call for Sites Land at Knocknagael Farm, Inverness

#### 1. Introduction

I refer to the site as above and as per the attached Call for Sites response form, location plan and photographs. The Crofters Commission, who manage Knocknagael Farm on behalf of Scottish Ministers in the operation of the Cattle Improvement Scheme which provides support to crofters, wish to make representations to the Inner Moray Firth Local Development Plan. As you will see from the attached plan there are 3 fields which this representation covers.

It is requested that Field 16 and Field 19 are allocated for residential development; and that the north-western section of Field 13 is allocated for the provision of allotments - this latter use is proposed both to address a shortfall in provision of this type of land use in Inverness, and in recognition that this use provides a suitable transition from residential development into the edge of town countryside area.

### 2. Justification for Proposed Development

The overarching reason for a review of Knocknagael and the adjoining Balrobert Farm, is that the Crofters Commission will be modernising **the bull stud facility**, as was indicated in the Crofters Commission's response to the consultation on the Highland Wide Development Plan. Release of surplus land will allow funds to be raised which will be reinvested into the modernisation programme; with this ensuring that the facility - which brings economic benefits to Inverness and wider benefits to crofting communities throughout the Highlands - will be retained and improved.

As part of this review the Crofters Commission has reviewed the extent to which their landholdings are productively used, and considered alternative land uses. Fields 16 and 19, and Part Field 13, are no longer critical to the ongoing operation of the bull stud farm due to the location of the flood protection channel, and the funds generated from their release for development, and eventual sale, would contribute positively to the ongoing modernisation.

The release or otherwise of these Fields for development would have a positive impact upon crofting - if the bull stud cannot be modernised then this will impact on the future ability for crofters to continue to produce cattle. Conversely, the release of land for development at Knocknagael provides a positive opportunity to offset the costs of the modernisation of the bull stud operation and support the Stud Farm in streamlining its operation to support the future continuation of the provision of high health cattle to groups of crofters across the crofting areas.

There are a number of reasons in **land use terms** for proposing the release of all of these 3 areas for development:

- Field 16 has been separated from the remainder of the farm by the flood protection channel and as a
  consequence cannot be utilized as part of the bull stud facility (it is currently sown with barley). Bulls
  cannot now be put on this Field since it is not directly connected to the remainder of the farm as it was
  previously.
- Field 19, has a gradient and its use by the Stud Farm has also been impacted upon by the flood
  protection channel. Due to the location of the channel there is no longer a safe work area for tractors at
  bottom of the field as there is no longer sufficient run off area available.. The bridges over the flood

protection channel would allow access into this area without disruption to the operations on the remainder of the farm unit.

- Neither field contribute to same level as they did previously to the bull stud operation the sole purpose
  of Knocknagael.
- It is considered that the most appropriate alternative use of these fields would be residential given the residential nature of the surrounding land to the north, west and east.
- As part of any residential provision, the Crofters Commission expect Highland Council to suggest a number of green amenity and community provision from the site such as allotment space. Related to the proposed residential development of Fields 16 and 19, for the reasons outlined above, the North West section of Field 13 could be suitable for any green amenity or community provision that Highland Council consider necessary for any associated change of zoning to Fields 16 and 19. This land use on the southern edge of the proposed residential area could provide a suitable transition from the built up area into the countryside, and could provide a positive opportunity for outdoor access and green space. Due to the proximity of the mains water supply, refuse collection route and main road Field 13 could contain the necessary elements for any necessary green amenity provision required by Highland Council.

Reallocation and development of this site would sit well with the Highland Council's vision, as set out in the September 2010 Highland Wide Local Development Plan - Proposed Plan. In particular:

- Supporting a Competitive, Sustainable and Adaptable Highland Economy by facilitating residential
  development in a suitable location which contributes towards reducing the need to travel and
  encouraging people to walk, cycle or use public transport; and
- Encouraging a Healthier Highlands by providing for development which contributes to quality open space provision and access to enjoy the outdoors (through provision of allotments, footpath / cycle links, and the edge-of settlement location) and by protecting and enhancing the green network.

Development of this land would sit well with the emerging Spatial Strategy for Inverness, as articulated in the Proposed Plan. The identified expansion areas of Ness Castle to the west and Culduthel / Slackbuie to the east, will both lead to the pattern of development moving slightly south. The land being promoted through this Local Development Plan submission does not extend this pattern further, but rather sits between these expansion areas and provides a natural additional area for residential development.

Providing a range of housing opportunities is consistent with the emerging strategy for the Inner Moray Firth area, which aims to increase the number of people residing in the area, with development focused where infrastructure exists, and where there are opportunities to protect and enhance access to outdoor recreational opportunities and wildlife and plant species habitat.

This site is deliverable, sustainable, and free from any major infrastructural constraints.

## 3. Potential Development; and Affordable Housing Provision

The total area of the 3 fields proposed for reallocation / development is circa 16.45 hectares:

- Field 16 circa 8.2 hectares
- Field 19 circa 4.55
- Part Field 13 circa 3.7 hectares.

This equates to around 12.75 hectares for residential, and around 3.7 hectares for any green amenity required by Highland Council as part of any zoning change.

No detailed site layout plans have been prepared, however if it is assumed that the net developable area of the residential land would comprise around 75% of the total identified area (it may be less for Field 19 given the topography), then this results in around 9.56 hectares of land for residential development. It is understood that

recent nearby residential development has been at a density of around 8 to 12 units per acre / 20 to 30 per hectare. This suggests that Fields 16 and 19 together could contribute around 195 to 290 units.

A new access could be formed off Essich Road directly into Field 16 - with this to keep residential and farm traffic separate. Alternatively, a roundabout could be formed off Essich Road, again to separate the two forms of traffic. Field 19 could be accessed via the bridges over the flood protection culvert.

Our client will ensure that affordable housing is delivered as part of the residential development of this site, in accordance with The Highland Council policy. This will be ensured either by stipulating appropriate delivery as part of the sale agreement of the site, or, if our client seeks planning permission in principle, by agreeing this direct with The Highland Council as part of the planning application process. In either case our client will not act as developer, but will ensure appropriate affordable housing provision. It is assumed that the Council would wish provision to be on-site, and we would be happy to discuss this at a later stage.

Any requirement for green amenity provision as part of the proposed change in zoning can be discussed with the Council.

## 4. Agricultural Land

Part of the land covered by this Local Development Plan representation is noted on the Local Plan Maps as prime agricultural land. The definition of prime quality agricultural land is land categorized by the Macaulay Land Institute as Class 1, 2 or 3.1.

There is no Class 1 or 2 agricultural land within Knocknagael.

The fields proposed for development / reallocation comprise the following:

#### Field 16 - total 8.2 hectares

4.0 hectares - Class 3.1 - has soil limitations due to stones. This area no longer lends itself to the agricultural practices of the Stud Farm. This area can no longer be fully utilised by the Stud Farm as the biosecurity and health & safety requirements prevent this area being used for grazing by the bulls due to the flood protection channel.

4.2 hectares - Class 3.2 - this is the area closest to Essich Road.

#### Field 19 - total 4.55 hectares

4.55 hectares Class 3.1 – this area has a gradient. The use of this land the Stud Farm has been impacted upon by the flood protection channel. Due to the location of the channel there is no longer a safe work area for tractors at bottom of the field as there is no longer sufficient run off area available. The area at the bottom of the field is immediately boundaries by the flood protection channel on the NW boundary. The field is only now suitable for grazing.

#### Field 13 - total area of whole field 13.07 hectares

Predominantly Class 3.2 with a small corner of Grade 3.1, which has been mostly lost to the Flood Prevention works, it is estimated that the maximum residue would be approximately 0.1Ha.

The proposed reallocation and development of Fields 16, 19 and part Field 13 would result in a loss of around 8.55 hectares of Class 3.1 agricultural land.

However, all of this land is constrained to some degree - by soil limitations, gradient in the case of Fields 16 and 19 respectively, and some has already been lost to the Flood Protection scheme. Field 16 is no longer a viable part of the Bull Stud Facility, as outlined above, therefore it is not a viable part of the landholding for this purpose. The additional constraint of stones lessens the productivity of this field. Thus whilst it is part Class 3.1, it is no longer a integral part of for the ongoing Bull Stud operations - and its release would have a net positive impact for the taxpayer in offsetting the cost of the modernisation of the Bull Stud Facility.

Field 19 is similarly not used as part of the bull stud operations - whereas it previously served a transition between field 16 and the remainder of the farm; it no longer serves this purpose. The site topography renders the site unsuitable for the bulls.

### 5. Impact of the change of zoning for crofting

As indicated in the Crofters Commission response to the Highland Wide Development – The modernisation of the Scottish Government Bull Stud Farm will ensure the Bull Stud continues to supply high health bulls to the crofting areas where ownership is impractical and commercial opportunities are lacking through the Crofting Cattle Improvement Scheme. The Scheme directly supports the retention of 50% of the cattle and supporting the production of high health quality beef across the crofting areas. In 2009 it was estimated that the scheme supported economic activity of a value of £708,703 pa. The scheme also supports crofters deliver certain environmental objectives through the SRDP.

The modernisation of the stud is essential to the future continuation of the Scheme and will provide Inverness and the crofting areas with a streamlined, modern bull stud facility for the future providing a safe environment for the housing of the bulls, whilst delivering best value for public money.

The modernisation project will consider and take into account both national policy objectives and the range of objectives identified in the Highland Wide Development Plan and actively input into the Inverness City Vision and the Inner Moray Firth Local Plan. Consideration will be given to the range of feasible activities which could be within the keeping of the Vision and Local Plan and acceptable use of assets to deliver best value of public money, required to deliver a successful project outcome.

Therefore the completion of the modernisation will support Highland Council in the delivery of the following objectives:

- a sustainable Highland Communities by supporting diversity in the age profile of crofters by providing both new entrants and current crofters with business opportunities which encourage them to remain in their local community;
- b Safeguarding our environment by enabling crofters to continue to deliver biodiversity and environmental benefits through the retention of cattle;
- c Supporting a competitive, sustainable and adaptable highland economy by providing crofters with the opportunity to access high health bulls where there is a lack of bulls to enable them to deliver quality calves and beef; and
- d Providing better opportunities for all crofters to invest in their businesses through the continuation of the scheme.

#### 6. Summary

The land as indicated on the attached plans has been proposed for development by the Crofters Commission following a wholesale review of their land and operations at Knocknagael and Balrobert Farms. The Crofters Commission is looking to modernize their bull stud facility' and the release of this land - which is not integral to their operations - will allow funds to be raised to ensure the modernisation can be delivered.

This positive opportunity for the Crofters Commission would lead to additional residential land being delivered - within an area where expansion has been promoted by the Highland Council in recent years. This area is highly accessible by a range of modes of transport, and is well connected to local facilities. Whilst the Fields promoted for residential development have been selected due to their separation from the remainder of the farm unit through the flood protection channel; and topography of one of the fields; the area promoted for allotments has been put forward as an opportunity to redress the identified shortage of land for this community use; and to provide a suitable transition between the urban and countryside area.

It is submitted that the release of these lands for development would facilitate modernisation of the bull stud facility, and also bring positive benefits in land use planning terms through the opportunity for development in an accessible and sustainable location.

I trust this will be of assistance, and please do not hesitate to contact the writer should you require any further information.

Yours sincerely,

Claire Peters Graham and Sibbald Email: <u>cpeters@g-s.co.uk</u>

Tel: 0141 332 1194 Mobile: 07717 321 449

# Site Forms

YOUR DETAILS	
Your Name (and organisation	Crofters Commission
if applicable)	
Your Address / Contact	Knocknagael Farm
Details	Essich Road
	Inverness
	IV2 6AJ
Landowner's Name (if	Crofters Commission
known / applicable)	
Agent (if applicable)	Graham + Sibbald (Claire Peters)
Agent's Address / Contact	18 Newton Place
Details (if applicable)	Glasgow
	G3 7PY

DETAILS OF SITE SUGGESTED	
Site Address	
Site/Local Name (if different	Land at Knocknagael Farm, Inverness,
from above	IV2 6AJ
Site Size (hectares)	Circa 16.45
Grid Reference (if known)	
Proposed Use (e.g. housing, affordable housing, employment, retail, waste, gypsy traveller, utility, community, retained public open space)	Residential, plus land for allotments
Proposed Non Housing	In the region of 195 to 290 residential
Floorspace / Number of	units
Housing Units (if	
known/applicable)	
Мар	Map attached

If you wish to suggest a site that should <u>not</u> be built on, fill in this form			
REASONS WHY YOUR SITE	SHOULD BE SAFEGUARDED FROM BUILDING		
How do the public	N/A		
enjoy the space - e.g.			
used for dog walking,			
children's play?			
What makes the site	N/A		
more <b>special</b> than other			
areas in the			
village/town?			
Does the site have	N/A		
attractive or rare			
features such as mature			
trees, historical			
significance or			
protected wildlife?			

Landowners, developers and/or agents wishing to suggest a site should fill in the following form <u>and</u> as much as possible of the strategic environmental assessment form (at the end of this document) which assesses the environmental effects of possible development sites.

If you wish to suggest a site that should be built on, fill in this form				
REASONS FO	R YOUR DEVELOPMENT SITE SUGGESTION			
How can the site be	Vehicular access off Essich Road.			
serviced?	Foul drainage to public sewer on Essich Road.			
(give details of	Surface water to be dealt with by designed SUDS			
proposed access, foul	scheme.			
drainage, surface water	Water to be taken off public supply.			
and water supply				
arrangements)	arrangements)			
	FORM CONTINUES BELOW			

REASONS FOR YO	REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION			
What are the site's constraints and how can they be resolved or reduced?  (e.g. does the site flood, are there protected species present, will good farmland be lost, will the local landscape be affected, will valued trees be felled, are any other heritage features likely to be affected?)  What benefits will result to the wider community from the site's development?  (e.g. will there be more or better jobs, will the land be put to a more productive use, will the development increase infrastructure capacity for others, will more affordable houses result, is there an unmet demand for the development?)	Local Plan maps show part of site as prime agricultural land. The highest rated land at Knocknagael is Class 3. This land is no longer able to be fully utilised by the bull stud farm primarily due to the separation of the land from the rest of the unit as a result of the flood prevention channel. Due to proximity to residential development this area cannot be used for grazing for biosecurity and health & safety reasons. Development of the land as indicated on the attached plan would have no impact on the viability of the overall farm unit and operation as the identified land is no longer critical to the operation of the unit. Further details are noted in the accompanying letter.  The site fits well within the allocated expansion area to the north and east; and the area to the west (allocated in the Adopted Local Plan). Development of this site would not extend the boundary of Inverness further south than existing. Development would contribute to a range of housing in the area with high accessibility to facilities (e.g. on Sir Walter Scott Drive, plus new Tesco on Dores Road and new Asda etc at Slackbuie).			
What impact will there be on travel patterns from the site's development?  (e.g. will more or less people engage in active and healthy travel (walk / cycle) or go by public transport as a result of the site's development rather than travel by private car?)	<ul> <li>No significant adverse impacts:</li> <li>Site is approximately 230 metres from nearest bus stop;</li> <li>Essich Road has been upgraded as part of the works for the new substation to the south;</li> <li>Site is just over 1 mile to the proposed new Asda and less than 1 mile to new Tesco i.e. suitable walking / cycling distances</li> </ul>			
Is the site well connected?  (e.g. will the average travel time to community and commercial facilities reduce or increase as a result of the site's development, is the proposed use compatible with existing / proposed surrounding uses?)	Proposed use is compatible with existing residential land use to north and west.  Adjoining allocated expansion area, and well connected as noted immediately above.			
Is the site energy efficient?  (e.g. will the site allow for energy efficient siting, layout, building design and local renewable energy source connection?)	South-facing aspect allows for natural daylight and sunlight.  Low and Zero Carbon Technologies can be incorporated into detailed design.			
What other negative impacts will the development have and how will they be resolved or offset?  (e.g. will the site's development increase any form of pollution or decrease public safety?)	No other known constraints.  Site currently forms part of amenity area / green wedge. However development would not extend settlement boundary further south than existing. Site is not highly visible from approach from the south due to topography of remaining land-holding.			

# STRATEGIC ENVIRONMENTAL ASSESSMENT FORM

Landowners, developers and/or agents wishing to suggest a site should fill in as much as possible of the following form. Strategic environmental assessment of local development plan sites is now a statutory requirement and considers the possible environmental effects of development proposals. We will check your answers and fill in any gaps.

No.	Issue	Detailed Explanation	Answer	Any Proposed Mitigation Measures (how will you reduce or offset the effects of your development?)
1	a) Will the site safeguard any existing open space within the area?	Will the site have any impact on useable public open space (such as parks, playing fields etc) or any opportunities to create additional public open space?	No - site is currently in agricultural use.	N/A
	b) Will the site enable high quality open space to be provided within the area?		Yes - development can incorporate suitable levels of accessible public open space.	N/A
2	Will the site encourage and enable provision for active travel (walking, cycling and public transport use)?	Is any part of the site within 400m straight line distance of any community/commercial building? or will development provide a community/commercial building within walking distance of existing residential areas?  - Are there opportunities to create new walking/cycling routes or improve existing routes?	Yes - site within a mile or less of new development areas including 2 supermarkets - suitable distances for walking or cycling. Development of residential areas can incorporate footpaths linking existing residential development to the west and north / east.	N/A
3	Does the site provide an opportunity for you to provide a financial contribution towards encouraging more sustainable travel patterns?	For example, can a subsidy to a local bus route be provided?	If required - impact of proposal can be considered at design stage through Transport Statement / Transport Assessment as required.	N/A
4	Will the site involve "off site" road improvements that will contribute to road safety?	Is the site likely to improve the local road network such as junctions or crossings?	If required as immediately above (question 4).	N/A
5	Is there scope for road	Will development incorporate on-site traffic	As above (question 4).	N/A

	safety measures as part of the development of the site?	calming measures (e.g. speed bumps) or street lighting? Will it incorporate the principles of Designing Streets available via: <a href="http://www.scotland.gov.uk/Publications/2010/03/22120652/0">http://www.scotland.gov.uk/Publications/2010/03/22120652/0</a>		
6	Is the site near any existing "bad neighbour" uses?	Will the site be negatively affected by any neighbouring use? (bad neighbour uses include those that affect residential property by way of fumes, vibration, noise, artificial lighting etc). Is the site affected by any of the Physical Constraints identified in the Council's Physical Constraints:  Supplementary Guidance?	The Bull stud farm will be adjacent to the areas identified. For biosecurity, health & Safety and biodiversity purposes a buffer will be provided.  The proposed use is consistent with established residential nature of surrounding area.	Hedging and fencing will be provided along the northern boundary to provide buffer and provide habitat connectivity with the gorge.
7	Are there any contaminated land issues affecting the site?	Are you aware if the site has been previously used for industrial or any other uses likely to cause contamination?	No	N/A
8	a) Is the site on derelict, vacant or other land that has previously been used?	a) Has the site been identified in Scottish Government's Vacant and Derelict Land Survey (which can be found here: <a href="http://scotland.gov.uk/Publications/2010/01/26135819/0">http://scotland.gov.uk/Publications/2010/01/26135819/0</a> ) or has the land got an existing use?	No	N/A
	b) Is the site on greenfield land?	b) Will the site be located on presently undeveloped land e.g. presently or capably used for agriculture, forestry or amenity purposes?	Yes	Please see the information provided above regarding issues around utilising the area for agricultural purposes.
9	Is the site within the current settlement boundary?	Is the site within any identified settlement boundary in the Local Plan? Is it allocated for any uses?	No - amenity / green wedge immediately adjoining expansion area	No
10	Will the site affect the distinctiveness and special qualities of the present landscape character or affect any landscape designation?	Does the site conform with the Landscape Capacity Assessment (if available)? Will the site result in the removal of valued landscape features or negatively affect any key views? Is it located within or would otherwise affect a National Scenic Area or Special Landscape Area, having regard to their special qualities?	No special landscape qualities / designation. Visibility of site is low from south due to topography of remaining land at Knocknagael	N/A

11	Will the site affect any areas with qualities of wildness? (that is land in its original natural state?)	Are you aware if the site is inside or likely to affect an area of Wild Land? (These areas are identified on Map 3 of SNH's Policy Statement, Wildness in Scotland's Countryside) and areas of Remote Coast identified by the Council, or an area of wildness identified in the draft Wild Land Supplementary Guidance?	No	N/A
12	Will the site affect a conservation area?	Is the site inside or likely to affect the character of a confirmed Conservation Area?	No	N/A
13	Will the site impact on any listed building and/or its setting?	Is there a listed building or a part of the setting "area" of a listed building within the site?	No	N/A
14	Will the site affect a site identified in the Inventory of Gardens and Designed Landscapes?	Is any part of the site inside the outer boundary of an Inventory "entry" or will the site affect the setting of an "entry"?	No	N/A
15	Will the site affect any locally important archaeological sites identified in the Historic Environment Record?	Does the site contain any features identified in the HER? If yes, will the site affect the feature?	A round barrow record HER Id MHG17655 is located within 16. There is no NMRS report found for this.	We would take guidance from Historic Scotland/the HC Archaeologist to discuss the best course of action to protect the site and enhance its surrounding features during any development of field 16.
16	Will the site impact on any Scheduled (Ancient) Monument and/or its setting?	Is there any SAM within the site boundary or will a SAM be affected?	The Boar Stone was discovered in Field 13.	We would take guidance from Historic Scotland / THC Archaeologist as to whether a watching brief would be required - although Field 13 is proposed for allotments only.
17	a) Will the site affect any natural heritage designation or area identified for its importance to nature conservation?	a) Is any part of the site inside or likely to affect the designation (SAC, SPA, SSSI, NNR, Ramsar) or Local Nature Conservation Site?	No	N/A
	b) Will the site affect any	b) Is any part of the site within or likely to	No	N/A

	other important habitat for the natural heritage?	affect non-statutory features identified as being of nature conservation importance e.g. Ancient, Semi-Natural or Long-Established Woodland Inventory sites, priority BAP habitats, habitats included on the Scottish Biodiversity List, non-designated habitats listed in Annex 1 of EC Habitats Directive?		
18	a) Will the site affect any protected species?	a) Will the site affect any European Protected Species, Badgers and species (birds, animals and plants) protected under the Wildlife and Countryside Act 1981 as amended. If such a species may be present on or near the site, a survey should be carried out to inform this assessment (for which a licence from SNH may be required)	An artificial badger sett is located along the northern boundary of this site - inside the adjoining existing housing area	An ecologist will be commissioned to prepare a suitable mitigation strategy as part of any planning application proposal
	b) Will the site affect any other important species for the natural heritage?	b) Will the site affect species listed in the UK and Local BAPs, the Scottish Biodiversity List and relevant annexes of the EC Habitats Directive?	No other species were found during the recent ecological survey carried out across the Stud. Copies of this can be provided to the Council if required.	Although no species apart from badgers were found on the fields in question, bats are located within the main steading at Knocknagael and these EPS and other species such as breeding birds utilise the steading area and gorge. It is intended that any green amenity provision required as part of any planning consent would enable us to support further habitat network development for these species.
19	Is the site proposed to provide any form of renewable energy?	For example, will the site provide or be capable of providing a district heating system, solar panels of a wind turbine?	Detailed proposals not yet prepared, but this will be addressed	N/A
20	Is any part of the site at risk from fluvial or coastal flooding as shown on SEPA's flood map or from local knowledge?	Are you aware of any part of the site being within the 1 in 200 year flood risk contour as identified by SEPA? (which can be found here: <a href="http://www.sepa.org.uk/flooding/flood-risk-maps/view-the-map.aspx">http://www.sepa.org.uk/flooding/flood-risk-maps/view-the-map.aspx</a> )	No	N/A

21	Will development of the	Will there by any change in rate, quantity,	No	N/A
	site result in the need	quality of run-off plus groundwater impact		
	for changes in land form	on or off site? If so, will these affect priority		
	and level? If yes, how	habitats, especially blanket bog?		
	will soil and drainage			
	issues be addressed?			
22	Is there a watercourse,	Will there be any culverting, diversion or	Existing flood prevention channel will be	N/A
	loch or sea within or	channelling of existing watercourses?	unaffected by any development	
	adjacent to the site? If			
	yes, how will the water			
	environment be			
	protected from			
	development?			
23	Will the site offer	Will the waste produced by the site be	Recycling facilities will be incorporated as per	N/A
	opportunities for	minimised and processed close to source in a	Council standards	
	sustainable waste	sustainable way?		
	management?			
24	Can the site be	Can the site be connected at reasonable	Yes	N/A
	connected to the public	cost? If not, what alternative is proposed?		
	water and sewerage			
	system?			
25	Will the site require	Can the site (including access) be developed	No	N/A
	alteration to the local	without significant re-contouring etc.? Will		
	landform?	access tracks and parking areas have		
		significant cut and fill?		
26	Will the site affect or be	This will be noted on any relevant shoreline	No	N/A
	affected by coastal	management plan.		
	erosion or natural			
	coastal processes?			
27	Is the site sheltered from	Will development make best use of the site	Yes	N/A
	the prevailing wind and	in terms of energy efficiency?		
	does it have a principal			
	aspect between SW and			
	SE?			
28	Will the site have any	Is the site near areas of employment or close	No	N/A
	impact upon local air	to public transport? Such developments are		
	quality?	less likely to result in additional traffic which		

		may contribute to air pollution.		
29	Will the site have an impact on light pollution levels?	Is it likely that the Council policy likely will require street lighting at this location? Are there proposals for floodlighting on the site?	Existing street lighting to site entrance on Essich Road	N/A
30	a) Will it the site affect the present green network of the area?	a) Will the site affect features that currently provide for the movement of species and/or people e.g. woodland, hedgerows, field margins, watercourses, coastlines, tree belts, greenspace?	Development of the site; including hedging as noted in response to question 6; will provide opportunity for wildlife and habitat corridor.	See our response to question 18(b)
	b) Will the site provide opportunities to enhance the present green network of the area?	b) Will connectively of natural features or open space and paths used for public amenity be improved? Will existing fragmentation of habitats and open spaces be improved? Will species be enabled to move where at present there is an obstacle?	As noted in response to question 18, an artificial badger sett is located next to the site.	Another ecological survey will be commissioned as part of any planning application; will ensure the proposed habitat enhancement and improve opportunities for badger movement through out identified fields into the main badger network on the stud.
31	Will the site provide opportunities for people to come into contact with and appreciate nature/natural environments?	Is the site close to (within 1.5km) an opportunity to come into contact with nature/natural environments e.g. Local Nature Reserves, local greenspace, green networks? Are there proposals which will increase opportunities to come into contact with nature/natural environments?	Yes - the developed site would mark the edge of the settlement boundary. The Crofters Commission accept that there may be requirements for green amenity provision by Highland Council as part of any change of zoning of the fields identified, and that provision could include provision of allotments or other local green space which would offer opportunity for outdoor recreation adjoining countryside.	N/A
32	a) Will the site affect any core paths or right of way?	a) Is a diversion of a core path or right of way required? Will there be any impact on the usability of a core path or right of way?	No	N/A
	b) Will the site affect any other existing paths or outdoor access opportunities?	b) Will it affect an existing path in the Highland Path Record? Will it provide additional access opportunities or adversely affect access opportunities afforded by the Land Reform (Scotland) Act 2003?	No	N/A

		<del>-</del>		
	c) Will the allocation provide new access opportunities within the site and linking to the path network beyond the site?	c) Will new paths be created within and beyond the site? Will any existing paths be improved e.g. to increase accessibility to a wider range of users? Will the site help to realise priorities identified in the Council's outdoor access strategy or aspirational paths identified in the core path plans?	Detailed design / layout will address access connectivity - both within the site and externally.  Opportunities to enhance horse-riding and cycling routes will also be addressed.	N/A
33	Will the site have an impact on the geodiversity of the area?	Are you aware if the site lies within or adjacent to an un-notified Geological Conservation Review site or Local Geodiversity Site? (or other site with geodiversity value e.g. distinctive landforms, areas with natural processes, rock exposures for study?)	No	N/A
34	Will soil quality and capability of the site be adversely affected?	Will the site result in a loss of soil due to development or removal of good quality soil from the site? Is the site on land identified as Prime Quality Agricultural Land?	Approximately 8.55 has of the fields identified are Class 3.1 The use of this land by the Stud Farm has been negatively impacted as a result of the flood protection channel.	Please refer to Section 4 of the attached letter detailing the lack of usability of this land by the Stud Farm. The release of this land will positively contribute to the modernisation of bull stud operations; which are an integral part of the continuation of cattle production across the crofting areas.
35	Is the site on peatland?	Is the site within or functionally connected to an area of peatland? Would the allocation involve the disturbance of peat? If yes, how would impacts on peatland be avoided or minimised? Would any tree felling be required?	No	N/A
36	Will the site have any affect on the viability of a crofting unit?	Does the site represent a significant loss of good quality inbye crofting land or common grazing land?	No, the release of this land will positively impact upon crofting through supporting the retention of cattle production across the crofting areas - see comments in attached letter relative to crofting.	N/A











