

Highland-wide Local Development Plan
Strategic Environmental Assessment
Post-Adoption Statement

PART 1

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

or

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PART 2

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

Highland-wide Local Development Plan

The Responsible Authority is:

The Highland Council

PART 3

Contact name Simon Hindson

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Signature & date S. Hindson 11/04/2012

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.

This is the Post-Adoption Statement for the Highland-wide Local Development Plan which was adopted on 5th April 2012 at the meeting of The Highland Council who are the Responsible Authority.

The Highland-wide Local Development Plan and the accompanying Strategic Environmental Assessment can be viewed online at:

<http://www.highland.gov.uk/developmentplans>


The documents can also be viewed at:

The Highland Council
Council Headquarters
Glenurquhart Road
Inverness
IV3 5NX

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Opening Hours
9am-5pm

Key Facts

Name of Responsible Authority	The Highland Council
Title of Plan, Program or Strategy (PPS)	Highland-wide Local Development Plan
What Prompted the PPS	The Planning Etc. (Scotland) Act 2006 requires Planning Authorities to produce Local Development Plans. The detailed regulations for this was brought forward through the Town and Country Planning (Development Planning) (Scotland) Regulations 2009 which came into force on the 28 th February 2009.
Subject	Town Planning
Period Covered by the PPS	2010 - 2030
Frequency of Updates	Every 5 years in line with Planning Etc. (Scotland) Act 2006
Area Covered by PPS	 <p>The map shows the Highland region of Scotland. A large green area covers most of the Highland, labeled 'Area covered by HwLDP'. A smaller grey area in the southeast is labeled 'Cairngorms National Park will produce a separate LDP'.</p>
Summary of nature/content of the document	The HwLDP is to guide development of Highland over the next 20 years. HwLDP will inform the production of the area Local Development Plans and will be used as the primary tool for making decisions on applications for planning permission.
Date Adopted	5 th April 2012
Contact Point	Simon Hindson, Planner Simon.hindson@highland.gov.uk Council Headquarters, Glenurquhart Road, Inverness, IV3 5NX (01463) 702261

STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Highland-wide Local Development Plan 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 Main Issues Report and the Proposed Plan stages of the Highland-wide Local Development Plan which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the Highland-wide Local Development Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the Highland-wide Local Development Plan;
 - 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 Highland-wide Local Development Plan
- Committing to monitoring the significant environmental effects of the implementation of the Highland-wide Local Development Plan. 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 Highland-wide Local Development Plan and how the Environmental Report has been taken into account

This section of the Post Adoption Statement sets out how environmental considerations have been taken into consideration when producing the Highland-wide Local Development Plan. It will contain information on how the following has been addressed in the Highland-wide Local Development Plan:

- Environmental Problems
- Significant negative effects
- Mitigation
- Significantly positive effects

Environmental Problems

The table below outlines the environmental problems which were identified in the Environmental Report and how these have been addressed in the production of the Highland-wide Local Development Plan:

SEA Issue	Environmental Problems	How has this been taken into account in producing the Highland-wide Local Development Plan
Biodiversity, flora, fauna	Stress on biodiversity and loss of habitat resulting from development. Vulnerability of rare and endangered flora and fauna to changes in climate. Loss of native woodland cover. Loss of peat land cover. Disturbance to protected species in the wider countryside. Fragmentation and loss of connectivity of habitats for species movement. Risk of invasive species. Renewable energy developments affecting wildlife. In-direct impact of development on designated sites.	The Highland-wide Local Development Plan has included specific mitigation in the form of policies to reduce the impact of development on designated sites, protected species, other important species and other important habitats and Article 10 features. Additional mitigation has been included on issues such as green networks to help reduce the fragmentation of habitats. Specific mitigation has been included in the policies on renewable energy development to ensure that the effect on wildlife is properly considered.
Population	Increasing population putting increased pressure on the natural environment in terms of water supply, energy supply and transport links. Limited quantity, quality and accessibility of open space in Highland. Limited accessibility to core paths in some areas.	Specific policies have been included in the plan to ensure that the pressure on the natural environment can be avoided or mitigated. Water supply, energy transmission and transport are all key policy areas of the plan. An integrated approach to the provision of high quality, accessible and fit for purpose open space and outdoor access has been brought forward through the plan to address the issues regarding open space access to the outdoors.
Human health	Ageing population. Loss of land for recreation.	The Highland-wide Local Development Plan has recognised these problems and brought forward policy approaches to address these issues.
Soil	Erosion. Potential contamination from nuclear decontamination and waste storage. Amount of contaminated land. Amount of waste going to landfill. Potential loss of agricultural land.	The Highland-wide Local Development Plan has sought to address these issues by having policy approaches to most of these issues. In terms of the loss of agricultural land the approach

	Potential loss or disturbance to peat land.	taken in SPP has been followed. In terms of nuclear decontamination The Highland Council's position on radioactive waste has been included in the plan.
Water	Flooding, drainage and erosion resulting from infrastructure and changing climate. The need to sustain water supply and sewage treatment. Tidal and fluvial flood risk to new and existing development. Reduced quality of watercourses and the coastal environment.	The Highland-wide Local Development Plan includes a suite of policies related to the water environment including flooding, waste water and aquaculture to help address these issues.
Air	Negative impact of development on air quality.	The Highland-wide Local Development Plan has specific policies relating to air quality and wider pollution to facilitate the mitigation of these issues.
Climatic factors	Lack of sustainable design. Potential for risk of landslips, erosion, coastal inundation, flooding. Potential to miss opportunities to facilitate species adaptation, create effective green networks, promote renewable energy, improve energy efficiency of buildings, promote the use of active travel, reduce the need to travel, increase forestry and woodland coverage and protect carbon sinks.	The Highland-wide Local Development Plan addresses the reduction in greenhouse gas emissions through renewable energy policy, promotion of green and active travel while also promoting sustainable design.
Material assets	Reduce travel/energy needs	The Highland-wide Local Development Plan addressed these issues through specific policies on sustainable design and construction and encourages the use of active/green travel and creates a policy framework to address these issues.
Cultural heritage	Stress on the historical environment resulting from development.	The Highland-wide Local Development plan takes a hierarchical approach to protection of cultural heritage through a consistent highland-wide policy approach which compliments national policy and legislation.
Landscape	The challenge of managing access to the natural environment. Development of inappropriate new development and infrastructure in sensitive landscape areas. Negative impact of development on traditional crofting settlement character. Loss of local landscape character. Renewable energy developments affecting landscape/seascape character and scenic value. Woodland expansion of particular types in sensitive locations. Cumulative landscape impacts	The Highland-wide Local Development Plan puts a strong focus on the importance of siting and design through a number of policies. There is also specific policies related the wider effects development can have on the landscape.

Significant negative effects identified in the Environmental Report and whether / how these have been dealt with in the Highland-wide Local Development Plan

No significant negative environmental effects have been identified in the Strategic Environmental Assessment Environmental Report. However, a number of minor negative effects have been identified. Mitigation has been suggested, including application of related general policies, to avoid or limit these minor negative effects.

Mitigation

There have been a number of instances where mitigation has been brought forward in the form of wording changes to policies, inclusion of new approaches or in terms of site allocations where this has led to mitigation which has been identified being inserted directly into the plan as developer requirements. It is recognised that for certain sites the mitigation has not been included in the Highland-wide Local Development Plan. In these instances it is because the allocation is already allocated in a separate local plan or if the site benefits from an extant planning consent and as such it would be inappropriate to add in additional requirements.

Significant positive effects identified in the Environmental Report and whether / how these have been dealt with in the Highland-wide Local Development Plan

A number of significant positive environmental effects have been identified in the Strategic Environmental Assessment Environmental Report. Where this has been the case the policy approach has, in some cases, been adjusted to ensure that the positive effects of the policy have been maximised.

The following are the significant positive effects which are likely through the plan which has been identified through the SEA process. This has been organised by SEA objective and the vision/spatial strategy/policy which are considered to have a significant positive environmental effect have been listed below each SEA objective.

Maintain and enhance designated wildlife sites, biodiversity, valuable habitats and protected species, avoiding irreversible losses. <ul style="list-style-type: none">• West Highland and Islands Vision• Caithness and Sutherland Vision• Inner Moray Firth Vision• Policy 1 – Completing the Unconstrained City Expansion Areas• Policy 57 – Natural, Built and Cultural Heritage• Policy 58 – Protected Species• Policy 59 – Other Important Species• Policy 60 – Other Important Habitats and Article 10 Features
Maintain, enhance and create green networks for wildlife and people. <ul style="list-style-type: none">• Inner Moray Firth Vision• Policy 9 – A96 Corridor Phasing and Infrastructure• Policy 19 – Smaller Settlements in the A96 Corridor• Policy 51 – Trees and Development• Policy 74 – Green Networks• Policy 75 – Open Space
Provide opportunities for people to come into contact with and appreciate nature/natural environments <ul style="list-style-type: none">• Policy 62 - Geodiversity
Protect and enhance human health <ul style="list-style-type: none">• Inner Moray Firth Vision• Policy 73 – Air Quality• Policy 75 – Open Space
Retain and improve quality, quantity and connectivity of publicly accessible open space.

<ul style="list-style-type: none"> • Policy 5 - Former Longman Landfill site • Policy 75 – Open Space • Policy 76 – Playing Fields and Sports Pitches
<p>Protect and enhance outdoor access opportunities and access rights including rights of way and core paths</p> <ul style="list-style-type: none"> • Policy 77 – Public Access
<p>Reduce contamination, safeguard soil quantity and quality</p> <ul style="list-style-type: none"> • Policy 3 City Centre Development • Policy 4- Longman Core Development • Policy 5 - Former Longman Landfill site • Policy 6 – Muirtown and South Kessock • Policy 7 – Inshes and Raigmore • Policy 14 – Whiteness • Policy 23 – Nigg Yard • Policy 25 – John O’ Groats • Policy 26 – Castletown • Policy 34 – Settlement Development Areas • Policy 42 - Previously Used Land • Policy 55 – Peats and Soils
<p>Minimise waste</p> <ul style="list-style-type: none"> • Policy 5 - Former Longman Landfill site • Policy 9 – A96 Corridor Phasing and Infrastructure • Policy 19 – Smaller Settlements in the A96 Corridor • Policy 54 – Mineral Wastes • Policy 70 – Waste Management Facilities
<p>Avoid impact to and where possible enhance the water environment</p> <ul style="list-style-type: none"> • Policy 63 – Water Environment • Policy 65 – Waste Water Treatment
<p>Maintain water abstraction, run-off and recharge within carrying capacity (inc future capacity)</p> <ul style="list-style-type: none"> • Policy 64 – Flood Risk • Policy 66 – Surface Water Drainage
<p>Maintain air quality</p> <ul style="list-style-type: none"> • Policy 73 – Air Quality
<p>Reduce vulnerability to the effects of climate change</p> <ul style="list-style-type: none"> • Inner Moray Firth Vision • Policy 28 – Sustainable Design • Policy 64 – Flood Risk • Policy 66 – Surface Water Drainage
<p>Increase proportion of energy from renewable sources</p> <ul style="list-style-type: none"> • Caithness and Sutherland Vision • Policy 28 – Sustainable Design • Policy 67 – Renewable Energy Developments • Policy 68 – Community Renewable Energy Developments
<p>Reduce the need to travel/increase opportunities for walking, cycling and public transport</p> <ul style="list-style-type: none"> • Inner Moray Firth Vision • Policy 3 City Centre Development • Policy 4- Longman Core Development • Policy 6 – Muirtown and South Kessock • Policy 9 – A96 Corridor Phasing and Infrastructure • Policy 12 – Stratton • Policy 14 – Whiteness

- Policy 18 – Nairn South
- Policy 19 – Smaller Settlements in the A96 Corridor
- Policy 22 – Cawdor
- Policy 23 – Nigg Yard
- Policy 34 – Settlement Development Areas
- Policy 45 – Communications Infrastructure
- Policy 56 – Travel
- Policy 77 – Public Access

Protect and where appropriate enhance the historic environment

- Policy 57 – Natural, Built and Cultural Heritage

Value and protect the diversity and local distinctiveness of landscapes

- Policy 48 – New/Extended Crofting Townships
- Policy 53 – Minerals
- Policy 57 – Natural, Built and Cultural Heritage
- Policy 61 – Landscape
- Policy 77 – Public Access

Conserve and enhance landscape character and scenic value

- Policy 57 – Natural, Built and Cultural Heritage
- Policy 61 – Landscape
- Policy 67 – Renewable Energy Developments
- Policy 68 – Community Renewable Energy Developments

Safeguard wild areas

- Policy 57 – Natural, Built and Cultural Heritage

How Consultation Responses have been taken into account

Two versions of the Environmental Report have been published:

- Environmental Report August 2009 – this accompanied the Main Issues Report for the Highland-wide Local Development Plan
- Revised Environmental Report September 2010 – this accompanied the Highland-wide Local Development Plan – Proposed Plan

During the consultation period for both documents, The Highland Council received comments from all of the Consultation Authorities on both occasions and at the Main Issues Report Stage from a member of the public as well.

The following pages set out how the views of all respondents at each stage of the Environmental Report have been taken on board.

Comments received at Environmental Report (Main Issues Report Stage)

Historic Scotland

Comment	Response
<p>General Comments I welcome the thoroughness with which this environmental assessment has been undertaken. It provides a clear account of the steps undertaken during the environmental assessment process and presents these in a logical structure. I am generally content with the assessment and have set out some detailed comments on some sections of the Environmental Report in an annex to this letter. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the plan.</p>	Noted.
<p>Assessment Methodology I welcome the inclusion of the objective for the historic environment and am content with the assessment methodology presented. I particularly welcome the acknowledgement that assumptions made in carrying out the assessment will be revisited in order to provide further clarity in the revised ER.</p>	Noted.
<p>Mitigation The ER assumes that “standard mitigation” will be secured to offset potential negative effects. As mitigation is a key part of the SEA process you may wish to elaborate on what standard mitigation is expected to comprise of within the revised ER.</p>	Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
<p>Monitoring I note that you propose to use the decline in the number of listed buildings and archaeological sites as indicators of the historic environment. These indicators could be affected by more than the Local Development Plan. Listing historic buildings is an ongoing process which means that the numbers of listed buildings often change. Similarly archaeological sites may be scheduled on an ad-hoc basis. Alternatively, you may wish to consider the number of planning applications which affect historic environment features as this will more accurately reflect the actual impact of the plan on the historic environment. The indicator relating to regeneration schemes is to be welcomed.</p>	Noted. The monitoring framework will be revised taking into consideration this comment.
<p>Appendix 2: Baseline Data Information and Maps To note that listed buildings, scheduled monuments and gardens and designed landscapes should fall under the Cultural Heritage SEA Indicator, not Material Assets.</p>	Noted. This will be amended in the RER.

<p>This section should also note the baseline data for unscheduled archaeology as utilised in the assessment of the Spatial Strategy.</p>	
<p>Appendix 4: SEA Assessment Matrices for Policy Approaches I note that the assessment is based on the assumption that the policy approach for the historic environment will secure suitable mitigation. It will be therefore be important that, as the detailed policy for the protection of the historic environment is brought forward at the proposed plan stage, this policy is thoroughly assessed to ensure that it can deliver the mitigation that underpins the findings of the assessment (i.e. that this policy will serve to mitigate significant negative effects on the historic environment). For example, the many of the assessments come out with a neutral effect where spatial strategies have the potential to impact on this historic environment (e.g. East Inverness, A96 Corridor)</p>	<p>Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.</p>
<p>Appendix 5: Site Assessments The thoroughness of this approach to site assessment is to be welcomed. However, a number of potential impacts on the historic environment have been missed in the site assessment for East Inverness and you may wish to correct the following site assessments in the updated ER.</p>	<p>Noted.</p>
<p><u>Site Reference SC:</u> This site has the potential to impact on the setting of the Category B listed Castlehill House.</p>	<p>All site assessments will be re-considered as part of the RER.</p>
<p><u>Site Reference H1:</u> The ER should recognise that this housing allocation is in close proximity to the scheduled monument Ashton Farm Cottages, ring ditch 390m SSW and pit circles 450m SW of (SM 11535)</p>	<p>All site assessments will be re-considered as part of the RER.</p>
<p><u>Site Reference H5:</u> This housing allocation is not labelled on the supplied map. However, I have assumed that this relates to the housing allocation to the north-east of the Category B listed Stratton Lodge Hotel. In light of this the ER should recognise that the allocation has the potential to impact on this sites setting. I welcome the recognition of the need to consult Historic Scotland in relation to the scheduled monument within this site. (SM 6001 - Milton, ring-ditch 320m SSE of).</p>	<p>All site assessments will be re-considered as part of the RER.</p>
<p><u>Site Reference HO2:</u> Stratton Lodge Hotel is a Category B listed building. This should be recognised within the assessment.</p>	<p>All site assessments will be re-considered as part of the RER.</p>
<p><u>Site Reference IP2:</u> The ER should recognise that this housing allocation is in close proximity to the</p>	<p>All site assessments will be re-considered as part of the RER.</p>

scheduled monument Ashton Farm Cottages, ring ditch 390m SSW and pit circles 450m SW of (SM 11535)	
<u>Site Reference R1:</u> The ER should recognise that this allocation is in close proximity to the Category B listed Stoneyfield House (HB 8059).	This element of the site assessment will be re-assessed in order to take this into consideration.

Scottish Environment Protection Agency

Comment	Response
<p><u>General Comments</u> We consider that generally the ER provides a comprehensive assessment on the Main Issues Report (MIR) and for this you are to be commended.</p>	Noted.
<p>We consider that there are lots of aspects of the ER which are good, and we have highlighted many of them below. There are really only two aspects of the assessment which we consider could be improved in the next version of the document. Firstly, the interpretation of the assessments that you provide in the main text of the ER is rather limited, and it would benefit from some reorganisation and enhancement. Secondly the next ER will have to clearly outline proposed mitigation.</p>	Noted. The RER will contain a written summary of each of the assessments outlining the significant impacts. Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
<p>In view of the fact this is an interim document and to be as helpful as possible we provide detailed comments below. Throughout the detailed comments we have provided specific examples of the issues we are referring to; please note these are highlighted as examples only and it will be necessary for you to consider all aspects of the ER where the comments apply.</p>	Noted.
<p><u>Detailed Comments</u> As a very minor issue you may wish to consider providing a detailed index and numbering the main sections of the next version of the ER; this will make them easier for everyone to refer to.</p>	Noted. This will be completed for the RER.
<p>We are pleased to note that the comments we made at the scoping stage on other possible PPS to consider has been acted upon. For your information the new website www.seaguidance.co.uk provides a very good list of the national and international PPS in relation to air, soil and water and you may wish to audit your own list against this to check whether there is anything important you may have missed.</p>	Noted. We will take this under consideration and check our list provided as part of appendix 2 in the DER for accuracy.
<p><u>Relevant aspects of the current state of the environment</u> We note you have tried to adopt a map-based approach to presenting this baseline line environmental data; this is in line with the government's guidance for local development plans in general.</p>	Noted.
<p>Other aspects of the environment which you may also wish to show by mapping include: windfarms in the Highlands (already available your own website), Shellfish harvesting and Shellfish Production area (we can provide), council run waste management infrastructure, water body classification (we can provide) and areas of cumulative drainage impact (already provided to the council as a GIS layer).</p>	We will aim to include this in the RER to ensure a more concise map based approach.

Generally this section could be enhanced if it included more analysis of what the data collected has actually shown. For example, is the water environment improving in the Plan area? How much prime agricultural land is available and how does that compare with Scotland as a whole? You can find information on general national trends in relation to air, soil and water from www.seaguidance.org.uk/11/State-of-the-Environment.aspx .	Noted. We will consider including this information where appropriate.
Environmental problems As a minor issue, but one that we highlighted at the scoping stage, meeting recycling and landfill targets is not an environmental problem; the amount of waste going to landfill is the environmental problem. We would welcome amendments to the text to reflect this.	This will be revised in the RER.
In view of the extent in which the area is covered by peat you may wish to consider identifying development on peatland areas as a specific issue due to the loss of stored carbon this causes and the amount of waste material it can produce.	Agreed. This will be included in the RER.
Alternatives We are satisfied with the proposal that the overall aim not be subject to the SEA process as it has been assessed as part of the SEA for the Council's Corporate Plan.	Noted.
We consider that Appendix 3 provides a good clear explanation of your preferred options and your possible alternative to these.	Noted
We note that there are a small number of elements of the spatial strategy where you have not identified reasonable alternatives. We consider this to be reasonable; you should not make up alternatives to satisfy the SEA process but instead assess what you really have or are considering as part of the plan-making process.	Noted and in agreement.
We also note that you have assessed the allocations in the A96 corridor, at Nigg and at Dounraey, as these will now form part of this plan. Some of these allocations have been assessed before, however, we are fully supportive of your decision to reassess these as part of the plan making process. This will ensure that they have been considered in the same rigorous manner.	Noted.
Assessments - general comments You have gone to significant trouble to assess all aspects of the MIR in some detail and for this you are to be commended.	Noted.
Your consideration of the results and interpretation of them within the main body of the text is however rather weak. This is disappointing in view of all the work you have done on the assessment and it is an area we would suggest you improve upon for the next version of the document. There seems to be three different aspects of the MIR which have been assessed - the spatial strategy, the policies and the strategic allocations - therefore we would recommend that you devote a section to each of these in the main body of the text before moving on to	The RER will contain a written summary of each of the assessments outlining the significant impacts.

looking at the cumulative and synergistic effects.	
The description of assessment methodology on page 28 states that "a final score will be attributed to each section of the matrices by looking at the overall matrix and balancing the relevance of the significant issues affecting that policy option". It would have been good to have seen these individual aspects of the assessment as it demonstrates that there is often a mixture of different responses to the relevant questions. In addition it would help to overcome the issue of one type of effect not cancelling out another type of effect. For example, positive effects do not cancel out negative effects or vice-versa.	This is something we have given consideration to and it will be made clearer in the RER.
Assessment of spatial strategy This is probably the most difficult aspect of the MIR to assess as it is the most strategic in nature. You seem to have adopted a sensible approach assessing the individual aspects of the spatial strategy and the strategy as a whole.	Noted.
The assessment of the whole strategy seems to concentrate on the affects of the A96 corridor; this seems reasonable in view of the high level of development proposed in this area.	Noted. We intend to break down the assessment of the spatial strategy to avoid this in the RER.
The assessment of cumulative effects of both the spatial strategy and policy options identifies that they will have no effect on a number of the SEA Objectives, including those related to waste minimisation, the water environment and climate change. Now that this has been identified it gives you the opportunity to consider whether there are ways that the spatial strategy and policies as a whole can be modified to improve its environmental assessment. We would welcome any steps you take to do this.	Noted. In the RER we will identify how environmental benefits can be enhanced, where appropriate.
Assessment of policy approaches We are pleased to note that you have taken into consideration the comments we made on the wording of the questions used to consider the SEA Objectives.	Noted.
There is a slight tendency in some instances to have assessed the plan as a whole rather than the specific policies and their alternatives. Some of the examples where the policy itself doesn't seem likely to have an impact are highlighted below.	Noted. The matrices where this is the case will be revisited in the RER
With the exception of those issues highlighted in the rest of section 8, we are satisfied with the assessments presented. Please note that from waste management onwards the full assessment matrices are not always titled which makes them difficult to follow.	Noted. The non titles were a result of a technical error and we will strive to make it more accessible for the RER.
Population and housing This policy relates to the scale of overall development to be proposed by the plan, with your preferred option suggesting significantly more development than the alternative. As a generality, more physical development means more impacts on the environment so generally	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.

<p>we would have expected more negative effects on the environment from the preferred option than from the alternative. The scoring you have provided is mostly identical and if you think that this is the case a better justification for this is needed in the text.</p>	
<p>In relation to SEA Objective 8 on waste management, neither of the options for growth will, by themselves, support the minimisation of waste production therefore we do not consider that either option should be scored positively. At a strategic level the preferred option, which involves more development, will be likely to generate more waste material.</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>Housing in the countryside We would suggest that SEA Objective 9 is of moderate, rather than low, sensitivity to this policy. This is because housing in the countryside generally results in a proliferation of private foul drainage schemes.</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>We note that all the options are scored the same. We would suggest that at a strategic level any policy which further restricts development in the countryside is likely to have less impact on the water environment than policies which do not permit it. This is because drainage is dealt with strategically in settlements.</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>This specific policy will not ensure new development is free from flooding, or enhance drainage or reduce the vulnerability of existing areas to climate change. As a result we would suggest that the assessment against SEA Objective 12 should be "equal".</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan..</p>
<p>Affordable housing We would suggest that this specific policy will not ensure that brownfield sites are reused, reduce the removal of good quality soils or protect soil functions. As a result we would suggest that the assessment against SEA Objective 7 should be "equal".</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>We are not clear why SEA Objective 10 would be moderately sensitive to a policy which considers the percentage of affordable housing.</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>We are not clear why this specific policy would ensure that new development is free from flooding, enhance natural drainage or reduce vulnerability to climate change. As a result we would suggest that the assessment against SEA Objective 12 should be "equal".</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.</p>
<p>We are not clear why this specific policy would increase the use of more sustainable transport methods or make open space accessible to all. As a result we would suggest that the</p>	<p>All assessments will be revised as policy approaches may have been modified or mitigation</p>

assessment against SEA Objective 14 should be "equal".	may have been written into the policy in the preparation of the proposed plan.
Sustainable development and climate change It could be anticipated that any additional development would mean increased impacts on the environment, so generally we would have expected more negative effects on the environment from the preferred option than from the alternative.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
Flooding We would suggest that your preferred policy, which supports engineering solutions to mitigate flood risk would have a negative effect against SEA Objective 9. In comparison the alternative option, which is more prohibitive of development in these areas would have a more positive impact.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
The need for flood risk assessments will not enhance natural drainage, prevent soil sealing or ensure that new development has Sustainable Drainage Systems (SuDS); at best the preferred option would have equal impacts. In comparison the alternative option will avoid soil sealing in the area at risk from flooding and leave these areas to natural drainage and will therefore have a more positive impact against this SEA Objective.	Noted. The matrices will be revisited and revised where necessary. This comment will also be taken into consideration in the preparation of the proposed plan.
Supporting proposals to mitigate flood risk, rather than avoid it, increases the vulnerability of development to the effect of climate change. We would therefore suggest that the preferred option would be scored negatively.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
We would disagree with the final commentary on this section. The alternative option is clearly more successful in relation to protecting the water environment and reducing our vulnerability to climate change. In practice mitigation measures for individual planning applications will result in hard engineering and physical disturbance of the water environment as this is the only mitigation available at that level. It is only the larger scale flood prevention schemes which are able to implement sustainable flood management and develop the type of habitat creation which the commentary discusses.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
Waste management We would suggest that the specific allocation of sites for strategic waste management facilities could ensure the re-use of brown-field sites in a way that directing facilities towards new industrial and business sites would not. In addition the local development plan should identify realistic sites, which do have the potential to become available, hence we are not convinced by this justification for the negative impact from the alternative option in relation to SEA Objective 7. We would consider that both policy options are likely to have a similar effect against this SEA Objective.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
We would suggest that a combination of both options would provide the best environmental	Noted.

outcome and further comments on this are provided in our response to the MIR itself.	
<p>Business and industrial land</p> <p>It is not clear that this specific policy favours the re-use and better use of existing brownfield sites. As a result we consider the impact against SEA Objective 7 should be equal.</p>	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
<p>Accessibility and transport</p> <p>We think that this policy will have a mixed rather than significantly positive impact on air quality (SEA Objective 11). Generally the improvement of the existing road infrastructure and extending the road network, by for example, new link roads, will encourage more of the public to drive, rather than generate more sustainable transport options. We would suggest that this would have a negative impact on the SEA Objective. However, the preferred option does include a specific element emphasising the reduction of emissions and promoting of cleaner fuels, which is obviously positive.</p>	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
Similarly, in relation to reducing the need to travel (SEA Objective 14) we would suggest that improvement of existing road infrastructure and extending the road network would encourage more travel, rather than reduce it.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
<p>Minerals</p> <p>Mineral applications can produce huge quantities of waste material. Other waste materials ie. secondary aggregate, can be utilised to try and reduce the need for new mineral sites. We would therefore suggest that SEA Objective 8 should be very relevant to your minerals policy and we make detailed comment in relation to this in our response on the MIR itself.</p>	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
Quarries are highly unlikely to provide new flood storage, and will make engineering changes to natural drainage. As a result we consider that the impact against SEA Objective 12 would not be positive.	All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
We note that you have included assessment of topics not covered by the MIR but which will be included in the proposed plan. This thoroughness is welcomed. We are generally satisfied with the assessments of these.	Noted. All assessments will be revised as policy approaches may have been modified or mitigation may have been written into the policy in the preparation of the proposed plan.
<p>Assessment of allocations (appendix 5)</p> <p>We welcome the fact that you have made it clear which allocations each of the assessments relates to - as this is not clear from the MIR.</p>	Noted. For information the proposed plan will give a much more accurate and easy to read map of the allocations.
A number of the allocations outlined either have planning permission or are currently going through the planning process. This means you have detailed information on these sites, which should be used to inform the SEA process. An example of this include the Nigg site where	Noted. The matrices will be revisited and revised as part for the RER.

work done by consultants on behalf of the council has already demonstrated that the site is not at risk from flooding (question 20), and that the site cannot easily connect to the public sewer (question 24).	
Question 21 - impacts on groundwater or surface water drainage The answers given to this question provide an example of an area where more consideration could be given to the standard responses provided and the consistency between assessments.	Noted. Noted. The matrices will be revisited and revised as part for the RER.
In nearly every case the answer given to the question 'will the allocation impact on groundwater or surface water drainage' is 'yes'. There are two issues with this. Firstly, all allocations for open space seem to be recorded as having an impact, yet if they are to be left as open space (rather than being cleared) then the actual impact on drainage and groundwater would be very minimal. Secondly, there are a few allocations where the question is answered negatively and the reason for this is not clear. Examples of 'no' responses include the campus site in Inverness (CA), and the quarry and hotel at Nairn (Q1 and HO). Why are these different? Our initial thoughts would be that these sites will be affected similarly.	Noted. Noted. The matrices will be revisited and revised as part for the RER.
If you next examine the impact of the allocation, the justification provided does not make it clear why some impacts will be 'positive' and some 'equal'.	Noted. The matrices will be revisited and revised as part for the RER.
When considering the question of impact will any of the specific allocations really have a positive effect on groundwater or surface water drainage? In most situations will it not be the case that the implementation of SuDS will ensure that there is no negative effect on the existing surface water drainage and groundwater? If this is the case there will be an equal impact, if SuDS is implemented. Development of an allocation could have a positive effect against this question if the site is to be re-developed and is currently developed without SuDS.	Noted. The matrices will be revisited and revised as part for the RER.
We would welcome if you considered the above, and how it might apply to other assessment, and revise the next version of the ER accordingly.	Noted. The matrices will be revisited and revised as part for the RER.
Question 22 - physical impacts on watercourses Generally the assessment seems to have been carried out well. We welcome the types of mitigation proposed (no culverting etc) - however currently there is no way of ensure this takes place. We would hope to see this specific mitigation, and the other mitigation outlined elsewhere actually included in the draft plan.	Noted. This will be included in the mitigation section of the RER and the proposed plan.
Question 24 - connection to public water and sewage We are pleased to note that all sites either can already connect to public sewerage, or will not be developed until connection is available. This is very welcome and we look forward to this mitigation being included in the draft plan.	Noted. This will be included in the mitigation section of the RER and the proposed plan.

<p>Question 26 - flood risk We are please to note that you have considered whether each allocation is at risk of flooding.</p>	Noted.
<p>We have reviewed the assessments provided using the Indicative River and Coastal Flood Map (Scotland) – 0.5% annual probability layer (1 in 200 year return period flood event) and the results of this are provided in appendix 2. We have categorised our response in the same way as we did for the Sutherland Local Plan and the West Highlands and Islands Local Plan.</p>	Noted.
<p>The first category of allocations lie either totally or significantly within the indicative limits of flooding as shown on the flood map. These include for example H6 in Inverness and H10 and H11 in Nairn. To mitigate the effect we would expect that a detailed site specific Flood Risk Assessment is carried out at this stage to determine whether the site can be developed in line with Scottish Planning Policy 7 and the results used to inform what is included in the draft plan; alternatively these allocations should be excluded from the plan. We consider that these allocations should have been assessed as having a significantly negative impact. Hopefully by carrying out further work, reducing the size of the allocations to those parts of the site which are likely to be SPP7 compliant and including suitable comments in the draft plan on the requirement for flood risk assessment (the extent of which will be dependant on the level of assessment you carry out at this stage) it will be possible for the final allocations to have a lower impact.</p>	Noted. This will form part of the explanation of the assessment matrices in the RER and appropriate text will be included in the mitigation section of the RER and carried through the proposed plan.
<p>The second category of allocations lie partially within or adjacent to the indicative limits of flooding as shown on the flood map. There were a number of these which your assessment did not identify; details in Appendix 2. To mitigate this effect we would expect these allocations to be revised to remove the area indicatively at risk. In addition the draft plan needs to make it clear that flood risk assessments will need to be submitted with these applications. We consider that these allocations should have been assessed as having a negative impact; hopefully by including the above mitigation this can be improved.</p>	Noted. This will form part of the explanation of the assessment matrices in the RER and appropriate text will be included in the mitigation section of the RER and carried through the proposed plan.
<p>Finally we have highlighted allocations containing watercourses with catchments of less than 3 km² which are not modelled on the Indicative River and Coastal Flood Map (Scotland). The assessment you have carried out does not seem to have considered this. To mitigate any possible effects we would recommend that the draft plan makes it clear that these specific sites may be at risk from flooding and a flood risk assessment may need to be submitted with any planning application.</p>	Noted. This will form part of the explanation of the assessment matrices in the RER and appropriate text will be included in the mitigation section of the RER and carried through the proposed plan.
<p>Potential Mitigation Measures Mitigating environmental effects is a very important aspect of SEA and we will expect the next ER to concentrate more on this aspect of the process.</p>	Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
<p>Where a proposal in this ER, or any subsequent assessments of the preferred policies, has a significant negative effect we would strongly encourage you to revise the proposal to remove</p>	Noted. This will be considered when bringing together the revised section on mitigation in the

that effect before it is included in the proposed Plan. Avoiding negative effects follows the mitigation hierarchy. An example of this would be to reduce the size of an allocation to remove the area indicatively found to be at risk from flooding.	RER which will accompany the proposed plan.
You are reminded that some negative effects of the Plan can be mitigated by other aspects of the Plan. For example, a policy in the plan requiring SuDS for all new developments would mitigate effects on drainage.	Noted.
We would also encourage you to use the assessment of effects as a way to improve aspects of your developing plan which either have negative or neutral impacts on the environment.	Noted.
Monitoring Framework An expansive list of monitoring proposals is outlined. This is commendable; however we would recommend that you consider concentrating your monitoring on the significant effects identified in the next ER, or on areas where baseline data could be usefully improved.	Noted. The monitoring framework will be revised taking into consideration this comment.

The following was provided by SEPA in specific relation to flood risk and the allocation based assessments. All relevant matrices will be revisited and revised taking into consideration the points made.

Site Name	Do we agree with the assessment of risk from flooding?	Advice on what 'impact' we think should be recorded for the allocation
East Inverness Proposed Site Allocations		
H6	Yes - we agree that a significant portion of the site is at risk from flooding.	The allocation is currently scored as negative. As a significant section of the allocation is at risk we suggest that the impact should have been significantly negative .
H1, H2, H4, H5, H7, PR1, B1	Yes - we agreed that parts of the sites are at risk from flooding.	The allocation is currently scored as neutral. As parts of the sites are at risk from flooding we suggest that the impact should have been negative .
H8, ED1	No - the sites are adjacent to the indicative limits of flooding and therefore still may be at risk.	As the risks from flooding maybe limited we are satisfied with the neutral assessment.
H3, R1, ED2, IP1, IP2, IP3, CA, HO2, SC	No - the sites are either adjacent to a minor watercourse or one runs through the site so risk from flooding is still possible.	As the risks from flooding maybe limited we are satisfied with the neutral assessment.

Nairn Site Allocations		
H10, H11	Yes - we agree that a significant portion of the sites is at risk from flooding.	The allocation is currently scored as negative. As a significant section of the allocations are at risk we suggest that the impact should have been significantly negative .
B5, H18	Yes - we agreed that part of the site is at risk from flooding.	The allocation is currently scored as neutral. As part of the site is at risk from flooding we suggest that the impact should have been negative .
B1	No - we consider that the site is partially within the flood map.	The allocation is currently scored as neutral. As part of the site is at risk from flooding we suggest that the impact should have been negative .
H12, H16, ED5	No - the sites are adjacent to the indicative limits of flooding and therefore still may be at risk. Note that ED5 is close to areas of historic flooding - we can provide further information on this if requested to.	As the risks from flooding maybe limited we are satisfied with the neutral assessment.
H17, H8	No - the sites are either adjacent to a minor watercourse or one runs through the site so risk from flooding is still possible. Note that H8 has a culverted watercourse in close proximity.	As the risks from flooding maybe limited we are satisfied with the neutral assessment.
Tornagrain		
M1 (Tornagrain)	No - we consider that the site is partially within the Flood Map and crossed by minor watercourses.	The allocation is currently scored as neutral. As part of the site is at risk from flooding we suggest that the impact should have been negative .
M2 (Whiteness) and B1	Yes - we agreed that parts of the sites are at risk from flooding.	The allocation is currently scored as neutral. As parts of the sites are at risk from flooding we suggest that the impact

(Dalcross)		should be negative .
Allocations outwith A96 Corridor		
B1 (Nigg)	No - recent work carried out by a consultant on behalf of the council has demonstrated that the site is not at risk from flooding.	We agree with the current assessment of neutral.
B2 (Dounreay)	Yes - we agreed that part of the site is at risk from flooding.	The allocation is currently scored as neutral. As part of the site is at risk from flooding we suggest that the impact should be negative .

Scottish Natural Heritage

Comment	Response
Firstly we would wish to commend you and the Council for the thoroughness and detail contained in this Environmental Report. The justification and commentary text within the matrices is a helpful means of seeking to understand how conclusions and decisions have been arrived at.	Noted.
We have set out our comments in the annexes attached to this letter. Annex 1 provides comments on the ER and appendices as a whole, while Annex 2 provides further more detailed comments on Appendix 4 (the assessment matrices for policy approaches). In making these comments we are mindful of course that the Main Issues Report stage is now closed and you will be moving on over the next few months to prepare the Proposed Plan, which will have its own separate Environmental Report. However we believe many of the issues raised can be taken across to inform and improve the ER for the Proposed Plan.	Noted.
From these comments I would wish to highlight the following as perhaps the most important to consider when undertaking the SEA for the Proposed Plan – 1. We recommend use of a multiple combined +/- scoring methodology in the matrix where positive, negative or neutral effects may occur, whether because of uncertainty or because of the need to ensure mitigation.	We will take this into consideration when preparing the proposed plan RER and use where we feel it is appropriate.
We then recommend that the proposed mitigation for identified negative effects (including those where it is a multiple i.e. +/-) is clearly set out – probably as a column or box in the matrices – so that it can be translated across into the Proposed Plan and linked as such. Hence we recommend terms like ‘standard mitigation assumed’ and ‘appropriate mitigation	Noted. We will do this where there is a specific issue related to mitigation. We will be providing clearer information on mitigation in the RER.

assumed' are avoided.	
A clear 'trail' is desirable that takes one through the identified negative effects, mitigation, how this is included in the Proposed Plan, any residual negative effects after mitigation and monitoring (with particular regard to any residual negative effects).	Noted. Assessment matrices will be revisited to ensure this can be the case.
We believe the SEA Objectives are by and large fit for purpose but there is a need to reconsider the 'considerations' listed under each objective. At present there is overlap and duplication, with some gaps, and we have set out in Annex 1 how the considerations can be reordered and improved. One particular difficulty relates to the coverage of wild land across two of the objectives with broader themes which tend to skew assessments here. So you will see that we suggest a further objective to consider wild land alone, so that the other objectives can have the wider considerations expected of them.	We recognise that this would be beneficial and we will look at this for the RER.
Within the proposals for the A96 corridor there are a number of designated areas and protected species that would be affected. These have not all been picked up in this SEA. This raises issues in terms of the environmental baseline data. For protected species we hope that 'About Scotland's Nature' on our website – www.snh.org.uk/snhi - may be helpful; also the NBN Gateway data – www.nbn.org.uk (though as these are based on past sightings these should not be taken as sufficient to establish the likely presence of a protected or BAP species), plus participation of your Biodiversity Officers.	Noted. We are in the process of ensuring all of our environmental data is up to date.
The SEA has indicated the tensions for possible policies with regard to development in crofting areas (subdivision of crofts; allocation of inbye land; new crofting townships; and small scale new crofts). We have commented on some of the assessments and assumptions made in these sections e.g. with regard to landscape character and biodiversity value. The ER was useful in amplifying the options as set out in the Main Issues Report, where there was little explanatory text. This does point to the need for the SEA for the Proposed Plan and the Proposed Plan itself to devote careful consideration to this issue. We see this as a topic for further discussion at agency workshops, perhaps joint with the Crofters Commission and Highlands and Islands Enterprise.	Noted. We consider crofting to be a sensitive issue not only due to the impact it may have on the environment but also the social and cultural impacts it has in the Highland area. We agree this should be subject of a joint agency meeting between SNH and the Crofters Commission.
The need for the Main Issues Report to consider a preferred option and reasonable alternatives ties in very well at this stage to the SEA process, where alternatives also need to be considered. At the Proposed Plan stage, the Council will have reached a 'settled view' on its desired policies and proposals, but there is still scope within the SEA to consider alternatives. We believe this is important because (a) certain preferred approaches at this stage are very general in nature and there will be alternatives within these, (b) reasonable alternatives may be put forward to the Council as a result of the consultation on the MIR, and (c) you may feel it prudent to provide fuller information on the alternatives of future housing land supply based on low and medium as well as high in-migration scenarios than was	Noted. The intention is that at the RER which will accompany the Proposed Plan we will assess alternatives which may have been raised through the MIR consultation. The RER will also drop out some of the assessments which have been included at this stage of the SEA process as through the consultation on the MIR and the ER which accompanied the MIR these have effectively been scoped out.

provided in the MIR.	
Non Technical Summary P5 - it would be helpful if the introductory sentences explained that SEA should identify and consider the likely significant effects on the environment of the policies and proposals of the plan, and should put forward mitigation measures to prevent, reduce or offset these effects.	Noted. This will be included in the RER.
P6 – under the current environment there should be recognition of the quality of the natural heritage (landscape, habitats, species) outwith designated areas.	Noted. This will be included in the RER.
P6-7 – under the list of existing environmental problems, some aren't 'environmental', e.g. ageing population, lack of provision of affordable housing, development of new housing and infrastructure. Two other existing environmental problems on the other hand are – <ul style="list-style-type: none"> • cumulative impacts of wind farm developments • allowing for possible presence of protected species in development Rather than “conflicts between designated areas and economic development” we suggest “incompatibility between some forms of development with the qualities of some designated areas”. ‘Loss of local landscape character’ could more accurately be described as ‘loss of distinctive landscape characteristics’ which occurs at both the local and regional levels. Wind farm developments can affect landscape character and scenic values.	Noted. This will be addressed in the RER.
P7 - likely effects – “In these areas there are some land allocations which are important to the development of the economy of Highland” – as a general point, while this is doubtless the case, it is not a factor for the SEA – this considers the likely significant environmental effects and possible mitigation.	Noted. This was included as we found it appropriate to mention that in the majority of cases we will need to balance the protection and enhancement of the environmental with creating a stronger, more sustainable Highland Economy.
P7-8 - The five policy areas listed all appear to be significantly positive in their likely environmental effects. It will be helpful to list any others that may have significant negative effects, and how this will be mitigated.	Noted. While none of the preferred options had significant negative affect at the proposed plan stage if this is the case this will be noted in the RER.
Introduction P9 - There are two stages to the Environmental Report – that for the Main Issues Report and that for the Proposed Plan. It would be helpful if this was clarified, considering how views on the SEA of the MIR will be taken forward to influence the Proposed Plan and its SEA. Mitigation of the preferred options at the MIR stage should lead to a more robust inclusion of policies within the Proposed Plan, hence with fewer likely negative significant environmental effects at this stage for the Environmental Report of the Proposed Plan to pick up.	Noted. This will be made clear in the RER.
Relationship with other PPS 12 EPS Interim Guidance – this should be at the Scotland rather than the International level. Also this is a publication of the Scottish Executive/Government rather than SNH.	Noted. This will be revised for the RER.

18 EC Birds and Habitats Directive should be two separate entries for Birds and Habitats separately – these are in fact included later as 34 and 35	Noted. This will be revised for the RER.
26 This repeats 11 (Convention on Biological Diversity)	Noted. This will be revised for the RER.
87 This is now the Climate Change (Scotland) Act 2009	Noted. This will be revised for the RER.
115 National Planning Framework 2 should now be considered rather than NPF1	Noted. This will be revised for the RER.
141 PAN 45 on Renewable Energy could note the annexes to this PAN	Noted. This will be revised for the RER.
200 This seems to repeat 178 (Highland Renewable Energy Strategy)	Noted. This will be revised for the RER.
227 Repeats 202 (Forest and Woodland Strategy)	Noted. This will be revised for the RER.
228 We would wish to see the series of Landscape Character Assessments that cover Highland listed, in the same way that the series of Local Biodiversity Action Plans and Core Path Plans are listed	Noted. These will be included in the RER.
229 Should read - Natural Heritage Futures Series – it would again be useful if the relevant ones were listed	Noted. This will be included in the RER.
241 Cairngorms National Park Local Plan – unsure why this is included as HWLDP will not include the National Park	We believed it was necessary to take this into account as the Highland Council still provide a number of services in the park and therefore it would be appropriate for the implications of this to be considered.
244 – 249 Core Path Plans – these repeat 221-226	Noted. They will be removed for the RER
For Scotland National should be added ‘Designing Places: A Policy Statement for Scotland’ (Scottish Executive, 2001).	Noted. This will be included in the RER.
We presume strategies and plans that relate to only a part of Highland aren’t included, given this is a Highland-wide plan. However for Regional, one important exception to add should be the Moray Firth SAC Management Scheme (2009), given the critical inter-relationship with the A96 Corridor and Nigg. See under Appendix 1 below for more details.	Correct. The Moray Firth SAC Management Scheme will be included in the RER.
Relevant aspects of the current state of the environment Again there is emphasis here on the natural heritage as defined by designated areas, but not reflecting the quality of the natural heritage (habitats, species, landscape and scenery) outwith designated areas. Data needs to be mentioned about the rich biodiversity of Highland outwith designated areas. Reference should be made to Scottish and Highland Biodiversity Plans, noting the number of priority habitats and species found in Highland.	Noted. This will be considered and appropriate information included in the RER.
With regard to landscape beyond NSAs there should be mention of the number and extent of AGLVs. Mention should also be made of the amount of wildland still in Highland as shown to date say by the Search Areas for Wild Land, and that this is a diminished asset.	Noted. This will be included in the RER.
Environmental problems Biodiversity, flora and fauna	Noted. This will be addressed in the RER.

See comment under NTS re 'conflicts between designated areas and economic development' 'loss of local landscape character' should go under Landscape Recommend add disturbance to protected species in the wider countryside Recommend add fragmentation and loss of connectivity of habitats for species movements. Recommend add invasive species	
The response picks up on the LDP identifying woodland and peatland areas, but this is to overlook any other habitats identified as a priority in BAPs. It would be valuable if the response also talked of measures to protect important species; of measures to conserve and enhance green networks; and of measures to steer development to less valuable types of habitat.	Noted.
The references to the access strategy and core path plans are not relevant here, and instead references should be made to Biodiversity Action Plans and Strategies.	Noted. This will be included in the RER
It would be useful to refer to the biodiversity duty here under the Nature Conservation (Scotland) Act 2004 and how THC intends to fulfil it in the context of development planning.	Noted. This will be included in the RER
<u>Population and human health</u> Suggest add the need for open space – a shortage in places? Quality and quantity?	Noted. This will be included in the RER
Suggest add the need for paths and cycleways near to where people live; a need for footpaths to link up with open spaces and other paths to create a green network – also the demand for allotments in urban areas	Noted. This will be included in the RER
The response should be to seek to link new development with the provision for outdoor recreation, open space and the maintenance and enhancement of green networks across all ages and abilities	Noted. This will be clarified however is already mentioned in the assessments for open space and green networks.
The references to affordable housing need is not as appropriate for a SEA	Noted. This will be removed.
<u>Soil</u> Add loss of prime agricultural land, Add loss or disturbance to peatland, Add impacts on geodiversity, Waste issues should more appropriately go under Material Assets than Soil, Vacant, derelict and contaminated land issues could go here.	Noted. These will be included in the RER
The response should be in terms of measures to protect prime land, important peatland and geodiversity value.	Noted.
<u>Climatic factors</u> There are many more issues to cover under this heading. Some could be addressed under other themes, but in general would include - Landslips Coastal inundation and erosion Flooding Species adaptation Green networks	Noted. Where possible we will secure baseline information on these topics and include them in the RER.

<p>Renewable energy Energy efficiency of buildings Active travel promotion – modal shift Reducing the need to travel Increasing forestry and woodlands Protecting carbon sinks e.g. peatlands</p>	
<p><u>Landscape</u> Omit reference to access here – this should go under Population and Human Health. Omit reference to ‘wildlife conservation’ under the response to landscape – this should go under Biodiversity.</p>	Noted. This will be rectified for the RER.
<p>Regarding the description ‘Wind farm developments affecting scenery and wildlife’, it would be clearer to describe this issue as ‘renewable energy developments affecting landscape character and scenic value, both individually and cumulatively’. Here it is important to highlight the issue of cumulative impacts. The current situation in terms of the unknown effects of various scenarios of proposed wind farms is a significant problem in terms of assessing capacity for other/ additional developments and thus a spatial framework and policy. In addition, it is not only wind energy developments that would have landscape (and seascape) impacts – so could marine renewable developments, biomass vegetation and processing structures etc.</p>	Noted. This will be reworded following suggestion to provide clarity.
<p>The term ‘development of new housing and infrastructure’ is a bit misleading. New housing and infrastructure don’t necessarily result in significant impacts. Only if this does not relate to the key characteristics of the landscape and visual resource, typically because it is of inappropriate extent, siting or design and/or exceeding the carrying capacity of the landscape to accommodate this form of development without loss of landscape character.</p>	Noted. This was included as there is potential for both positive and negative significant affects on the landscape, however it will be clarified for the RER.
<p>Other key potential landscape impacts may result from woodland expansion of particular types in certain locations and flood/ sea defence structures.</p>	Noted. This will be included in the RER.
<p>The response should omit references to wildlife and croft land and include the implication that ‘development should relate to landscape character and protect and enhance landscape and scenic value, including designated areas and areas of wild land’.</p>	Noted. This will be included in the RER.
<p>Likely evolution of the environment without the plan Other bullet points could be –</p> <ul style="list-style-type: none"> • Failure to establish a Highland wide approach to the safeguarding and enhancement of the natural heritage • Addressing adaptation to climate change e.g. green networks, at the regional as opposed to the localised level • Risk of increased cumulative impacts, including attrition upon areas of high landscape 	This is welcomed. These additional points will be in the RER.

value, such as NSAs, AGLVs and areas of wildness qualities	
<p>SEA Objectives The 17 objectives are broadly welcomed, but while appreciating comments made at the scoping stage, there is overlap within the details of them which creates difficulties when assessing impacts in relation to these objectives. For example wildness qualities fall within certain aspects of objectives 3, 16 and 17. This is discussed in more detail with regard to the considerations in Appendix 4.</p>	Noted. We have taken on board this comment and have revised the RER accordingly.
<p>Assessment of cumulative effects This combined matrix approach is welcomed. Our detailed comments on the individual scoring are given under Appendix 4.</p>	Noted.
SEA Objective 1 (biodiversity) – it will be useful to set out in rather more detail how mitigation can be achieved for predicted significant adverse effects of business and industrial land on biodiversity and designated sites. If necessary compensatory measures should be provided for.	Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
SEA Objective 2 (green networks) – this SEA could be more ambitious here and look to deliver positive effects for green networks rather than be content with an overall neutral assessment. For example flood management could have indirect benefits for green networks.	Noted. In the RER we will be looking at how the proposed policies can have enhanced significant benefit and where possible turn a neutral into positive. This may be through cumulative affects.
SEA Objective 13 (renewable energy) - this objective will cumulatively affect objectives 16 and 17 and by implication objective 3 in relation to wild land. It is stated that other objectives 'do not directly relate to the SEA objective'. Without a renewables capacity study, it is not possible to confirm whether this is the situation; however, it is expected that, because of existing and potential cumulative landscape and visual impacts, the capacity of the landscape for further wind energy development will actually be limited in some places, thus affecting the ability to achieve this objective.	Noted. The cumulative affect of the policies in the proposed plan will be revised in the RER.
SEA Objective 16 (landscape) – this paragraph is not at all clear and the measure of overall neutral cumulative impact is not sufficiently explained or justified. In particular it is not considered that the proposed crofting policies would result in 'significantly positive impacts'.	Noted. This will be addressed in the RER where further explanation will be provided where appropriate.
SEA Objective 17 (landscape) – this paragraph is too brief and vague. It does not explain or justify the overall positive cumulative impact. We would question the positive scoring given for crofting and transport policies in terms of landscape character and scenic value. On the other hand negative effects have been identified for renewable energy and business and industry.	Noted. The cumulative affect of the policies in the proposed plan will be revised in the RER.
<p><u>Cumulative assessment of spatial strategy</u> Please refer to detailed comments under Appendices 4 and 5. The summary paragraph here is very unclear. The scoring appears to be affected by wild land areas being protected from such development as proposed within the A96 corridor. This slants scoring towards an overall</p>	Noted. The cumulative affect of the policies in the proposed plan will be revised in the RER. The Spatial strategy will be assessed in more detail which hopefully will clarify the issues raised

positive outcome and a more realistic assessment would be welcomed.	
<p>Potential Mitigation Measures</p> <p>There is no discussion here of ‘standard mitigation’ which it is claimed will avoid all negative effects except for business and industry. The detailed matrices should be used to set out mitigation where necessary and how this will be taken across into the Proposed Plan. This is especially important given that many scores are neutral rather than negative because standard mitigation is assumed.</p>	Noted. Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
Although the policy for business and industrial land has been identified here, it is unclear how mitigation measures can be considered until sites for economic development are identified – which has been left to the Proposed Plan stage rather than the MIR stage. So it is unclear why business and industrial land should perform any more poorly at this stage compared to housing land supply on the basis of highest projected levels of in-migration – where sites also still need to be identified (except for the A96 corridor).	Noted. Through preparation of the plan and appropriate policy wording we hope to identify appropriate mitigation for negative affects. At the RER stage any identified business and industry sites will be assessed.
It is also unclear why specific mitigation isn’t also discussed here for renewable energy developments – which have scored negatively in terms of landscape.	Noted. Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.
The ER for the Proposed Plan should identify any residual negative environmental effects, so it is important that there is clear sequential identification of likely significant negative effects, mitigation to avoid or reduce these, the residual negative effects and monitoring thereafter.	Noted. This will be made clearer in the proposed plan.
<p><u>Assessment of compatibility between policy approaches</u></p> <p>This is a useful matrix approach, although its broad brush nature may conceal detailed potential incompatibilities. In particular proposed crofting policies and landscape; renewable energy and wild land; agricultural land/soils and housing land supply.</p>	Noted. The RER will revise this matrix but also recognise the potential affect at a smaller scale
A key issue for this assessment is the omission at this stage of the renewable energy strategy and design guidance for housing in the countryside. These are crucial to be able to make this assessment.	Noted. These will be subject to separate SEA processes but through the HwLDP it will be possible to
<p><u>Measures to reduce significant adverse effects</u></p> <p>We note this table has still to be prepared and will be prepared as the Proposed Plan is progressed. The existing environmental problems are again shown here, and we are unclear how the proposed methodology will combine an assessment of the potential negative effects of the plan, together with measures to reduce or avoid these effects, with an assessment of the consequences for existing environmental problems. We believe it would be easiest to understand if the main matrix that identified any likely significant negative effects also included as a further column the proposed mitigation, with a cross reference to where or how the mitigation then appears in the Proposed Plan. A separate chapter could then revert to the existing environmental problems and how the plan will improve these. Beforehand however</p>	<p>Noted. Mitigation will be set out in the Highland wide Local Development Plan and in the Revised Environmental Report.</p> <p>The proposed plan will be clear on what mitigation will be sought.</p>

the existing environmental problems should inform the identification of the SEA Objectives, so that as mitigation is developed to avoid effects on objectives, they in turn will avoid effects on existing environmental problems.	
<u>Monitoring</u> We welcome the identification of monitoring indicators, although it is important to bear in mind that the requirement here is for the effects of the plan to be monitored. Other indicators may suit in terms of the overall wellbeing of the Highland environment in regard say to Single Outcome Agreements.	Noted. The monitoring framework will be revised and refocused for the RER.
<u>Biodiversity</u> 'Number of notified or qualitative interests (e.g. protected habitats and species) adversely affected by new development' – maybe amend to 'number of occasions when designated sites, protected species or BAP priority habitats and species are adversely affected by development' 'Proportion of required open space being natural/wild areas and augmenting habitats' – maybe amend to 'contribution of new open space to biodiversity – are habitats of low, medium or high value?' Monitoring of green networks should be added – number of cases where green networks are fragmented or reduce connectivity; number of cases where green networks are maintained or enhanced.	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
<u>Climatic factors</u> Suggest add monitoring of carbon budget of Highland – energy efficiency of buildings; proportion of energy consumption from renewable sources; emissions from transport modes	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
Progress towards a green network for species adaptation across Highland	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
Carbon balance in the natural environment – peatland, woodland	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
<u>Human health</u> As well as monitoring of open space availability, suggest add monitoring of path and cycleway network.	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
<u>Soil</u> Either here or under climatic factors, recommend monitoring of loss or disturbance to peatland (not just in designated areas).	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
Geodiversity – add monitoring re impacts on any geological or geomorphological sites; number of quarries where exposures can be studied.	Noted. The monitoring framework will be revised and refocused for the RER taking on board this

	comment.
Landscape Key issue here should read 'decline in diversity and quality of landscape character and views'. Inclusion of the term 'townscape' seems out of place as this is not used elsewhere in the document.	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
Monitoring for landscape impacts should include the possible cumulative impact of approvals of individual developments which in themselves have not raised landscape objections when considered in isolation.	Noted. The monitoring framework will be revised and refocused for the RER taking on board this comment.
Appendix 1 Relevant plans, programmes and strategies Please see earlier comments – it would be helpful if these were numbered here in the same way as in pp14-19 of the main Environmental Report. The recommended entry for the Moray Firth SAC Management Scheme should read as follows - <u>Name of PPS</u> Moray Firth SAC Management Scheme (2009) <u>Objectives/Requirements of PPS</u> Provides a list of generic and specific actions that relevant authorities have agreed to implement in order to safeguard and enhance the bottlenose dolphin and sub-tidal sandbank interests of the Moray Firth SAC <u>How it affects or is affected by the HwLDP</u> A number of the activities are direct relevant to the HwLDP, for example water quality, diffuse run-off from land, coastal development, aquaculture and marine littering.	Noted. Will be modified for the revised environmental report.
With regard to the European Landscape Convention (International) please note this applies to all landscapes, not just designated landscapes.	Noted. Will be modified for the revised environmental report.
Appendix 2 Baseline data information and maps <u>Population and Human Health</u> Path and cycle networks are covered under Material Assets, and it would seem more appropriate to include this under Population and Human Health. Likewise open space is included under Landscape, but this too should be moved to Population and Human Health in terms of the ability for outdoor recreation. The information for open space will not come from Landscape Character Assessments, but will come from Open Space Audits and the Greenspace Audit for Inverness.	Noted. Will be modified for the revised environmental report.
<u>Material Assets</u>	Noted. Will be modified for the revised

See above re path networks and cycle paths. Listed buildings, scheduled monuments and Gardens and Designed Landscapes should feature under Cultural Heritage. Waste is usually considered under Material Assets (see Soils below)	environmental report.
<u>Climate factors</u> Perhaps other large organisations will have data on estimated CO ₂ output, green travel and energy consumption that can be added to data relating to The Highland Council.	Noted. This is something we are investigating as part of the ongoing monitoring on the Councils Corporate Plan. We will include if we can find appropriate information.
Data should be added re adaptation or otherwise of habitats and species to climate factors – e.g. Modelling Natural Resource Responses to Climate Change (MONARCH) – see UKCIP website – UK Climate Impact Programme e.g. – http://www.ukcip.org.uk/index.php?option=com_content&task=view&id=331	Noted. Will be modified for the revised environmental report.
Suggest also include some baseline data on landslides or erosion e.g. affecting roads – do TEC Services have a record of this?	Noted. Will be modified for the revised environmental report.
<u>Soil and Waste</u> It is suggested that waste be considered under Material Assets. A baseline of land quality/capability could be added – presumably MLURI have this data – although changes may be too small to register at the Highland level	Noted. Will be modified for the revised environmental report.
Geodiversity data should be included here – in particular GCR and RIGS sites – GCR sites should be available on the SNH web site – www.snh.org.uk/snhj . See note re peatland below.	Noted. Will be modified for the revised environmental report.
<u>Landscape</u> This has included the wrong SEA Objective (open space). Instead SEA objectives relating to landscape character, scenic value and wild land should be considered here. However we note the LCA series of reports is listed here.	Noted. Will be modified for the revised environmental report.
Maps of AGLVs and Landscape Character Types should be added to the spatial data available.	Noted. Will be modified for the revised environmental report.
Wild land consideration could use spatially at this stage the Search Areas for Wild Land as identified by SNH.	Noted. Will be modified for the revised environmental report.
Peatland could go instead under Soils or Biodiversity. Please note peatland is not confined to Caithness and Sutherland, nor to designated areas. MLURI data may be the most appropriate for peatland generally.	Noted. Will be modified for the revised environmental report.
Forest and Woodland could go instead under Biodiversity, Flora and Fauna.	Noted. Will be modified for the revised environmental report.
Agricultural Land should probably go instead under Soils.	Noted. Will be modified for the revised environmental report.
The issues under 'Coast' do not relate to landscape – instead they relate to biodiversity and material assets (harbours).	Noted. Will be modified for the revised environmental report.

SNH is devising 'Built Indicator' or 'Landscape Total' spatial data for national indicators. This identifies the extent of land affected by buildings, roads, structures and quarrying and may be useful data for future landscape monitoring.	Noted. Will be modified for the revised environmental report, if available.
<u>Biodiversity, Flora and Fauna -</u> The NBN database re species needs to be added here – www.nbn.org.uk Also go to SNHi on SNH's website and use 'About Scotland's Nature' to access the NBN database for site areas – www.snh.org.uk/snhi	Noted. Will be modified for the revised environmental report.
The Site Condition Monitoring database should be added to the data source for the first SEA Objective entry – please contact Brian Eardley at SNH (brian.eardley@snh.gov.uk) for more information.	Noted. Will be modified for the revised environmental report.
There are a number of national surveys which are repeated each year that could be made use of e.g. WeBs, Bat Conservation Trust surveys. THC Biodiversity Officers should be able to advise. They will also be aware of localised Highland surveys that may be able to be used e.g. invasive species monitoring.	Noted. Will be modified for the revised environmental report.
Spatial data exists for ancient, semi natural and long established woodland. There is also some coverage of SWT Phase 1 Habitat Surveys.	Noted. Will be modified for the revised environmental report.
The information on data for paths (e.g. core path plans) should not appear here but appear instead under Population and Human Health.	Noted. Will be modified for the revised environmental report.
Appendix 3 Alternatives to which SEA was applied This contains the preferred options and alternatives from the Main Issues Report, on which we comment in our separate response to the MIR itself. Further alternatives of a more detailed nature within the preferred options are likely to have to be considered within the Environmental Report for the Proposed Plan.	Noted.
Appendix 4 SEA Assessment Matrices for Policy Approaches We set out here some general comments on the conclusions of the assessment matrices and draw attention to any specific aspects of concern. More detailed comments are provided in Annex 2.	
Depending on whether any policy ties into the vision statement, this part of the Proposed Plan would probably also benefit from inclusion in the SEA.	Noted.
<u>Objective 1 ('Maintain and enhance designated wildlife sites, biodiversity, valuable habitats and protected species, avoiding irreversible losses')</u> The last consideration ('Will it prevent the fragmentation of green habitat networks?') overlaps with Objective 2, so could be moved there. A consideration re designated sites could be added ('Will designated sites be protected?').	Noted. This will be brought forward in the revised environmental Report
<u>Objective 2 ('Maintain, enhance and create green networks for wildlife and people')</u> As noted the last of the considerations under Objective 1 is about green networks and so	Noted. This will be brought forward in the revised environmental Report

could go under Objective 2. Green network considerations also appear under Objectives 5 ('Will it ensure better connectivity of open spaces?') and 6 ('Will it create or enhance green networks for wildlife and people?'), which could therefore be better located under Objective 2.	
The first presently shown ('Will it ensure the importance of the protected species of the area is made a priority?') would be covered under Objective 1 so can be swapped.	Noted. This will be brought forward in the revised environmental Report
The second presently shown ('Will it contribute to education of local people and tourists in terms of their understanding of the local wildlife?') would be better placed under Objective 3 (see below).	Noted. This will be brought forward in the revised environmental Report
The third presently shown ('Will it provide or enhance access to areas of high biodiversity value?') again would be better placed under Objective 3 (see below) (although the assumption behind this is questionable, since some areas of high biodiversity value may be relatively sensitive to access, so enhancement of access to areas of rich biodiversity may be better).	Noted. This will be brought forward in the revised environmental Report
Alternative more focussed considerations for this Objective 2 re green networks could be - <ul style="list-style-type: none"> • Will existing areas of importance for the movement of wildlife and the enjoyment of people be maintained? • Will opportunities be created for the existing green network to be more connected and expanded? 	Noted. This will be brought forward in the revised environmental Report
<u>Objective 3 ('Provide opportunities for people to come into contact with and appreciate nature/natural environments')</u> See above re considerations under Objective 2 that would be better placed under this objective. The consideration re wild land ('Will it safeguard the ability of people to experience the qualities of wildness?') is very good, but we wonder if a separate objective should be created for wild land under which this consideration, plus a consideration under Objective 17 ('Will it protect areas with strong qualities of wildness?') could go. In this way Objective 3 could focus more on enjoyment and interpretation opportunities in the 'Hinterland in and around Towns' where SEA is likely to be concentrated. The extra wild land SEA Objective could be 'Safeguard wild land quality'	Noted. This will be brought forward in the revised environmental Report
<u>Objective 4 ('Protect and enhance human health')</u> The inclusion of a consideration about walking/cycling under this Objective can rather skew the scoring for this objective, and duplicates consideration under SEA Objective 14 (re travel), where this could be a more focussed consideration. So 'Will it ensure better opportunities for walking and cycling?' could be moved to Objective 14 ('Reduce the need to travel/increase opportunities for walking, cycling and public transport')	Noted. This will be brought forward in the revised environmental Report
<u>Objective 5 ('Retain and improve quality, quantity and accessibility of publicly accessible open space')</u>	Noted. This will be brought forward in the revised environmental Report

As noted the last two considerations here could be moved to Objective 2 re green networks. A consideration under Objective 14 ('Will it make open spaces more accessible to all?') should be moved to here in order that quantity, quality and accessibility are all covered under this objective.	
<u>Objective 6 ('Protect and enhance outdoor access opportunities and access rights, including rights of way and core paths')</u> As noted the second consideration could go under Green Networks (Objective 2) Instead a consideration along the lines of 'Will access opportunities be upheld and enhanced?' could be added.	Noted. This will be brought forward in the revised environmental Report
<u>Objective 7 ('Reduce contamination, safeguard soil quantity and quality')</u> A consideration regarding peatland could be added here ('Will carbon storage of peatland be protected?')	Noted. This will be brought forward in the revised environmental Report
<u>Objective 12 ('Reduce vulnerability to effects of climate change')</u> This should include considerations re coastal inundation through sea level rising/surge and avoidance of areas at risk of landslide/landslip. The commendable consideration regarding green networks can be moved to Objective 2.	Noted. This will be brought forward in the revised environmental Report
<u>Objective 13 ('Increase proportion of energy from renewable sources')</u> It should be noted that the capacity of the landscape to accommodate new wind farm developments will be significantly affected by other developments – not only individually, but also cumulatively - and not only existing developments, but also potential developments which present a number of possible cumulative wind farm scenarios. The various impacts of these cannot be defined at present as they have not all been determined. This cumulative situation will change during the life of the plan and will be affected by both offshore and onshore developments. Consideration should also include electricity linkage and how this may affect distribution of developments	Noted. This will be brought forward in the revised environmental Report
<u>Objective 14 ('Reduce the need to travel/increase opportunities for walking, cycling and public transport')</u> See above re considerations to move from here and to add to here. Add 'Will it reduce the need to travel?'	Noted. This will be brought forward in the revised environmental Report
Then a consideration could be added here re designated areas by switching the second of the consideration under Objective 17 ('Will the special qualities of designated areas be maintained or enhanced?') to Objective 16.	Noted. This will be brought forward in the revised environmental Report
Measures of impact given for this SEA objective often suggest that this is mainly a local issue; however, it is in fact a regional issue in terms of the diversity of Landscape Character Types (LCT) across Highland. There is also a suggestion that mitigation of design may be enough to protect diversity and distinctiveness. However, in some places, no matter how good the siting	Noted. This will be brought forward in the revised environmental Report

and design is executed, there may be unacceptable impacts, e.g. no capacity for an industrial building within a wild land area.	
<u>Objective 17 ('Conserve and enhance landscape character and scenic value')</u> See above re considerations to switch over here. Also see above re a new SEA objective for wild land so that this particular consideration can be switched from here.	Noted. This will be brought forward in the revised environmental Report
Landscape character would be covered by the first consideration from Objective 16 coming in here. Scenic value needs to be covered by a consideration such as 'Will visual impact be minimised?'	Noted. This will be brought forward in the revised environmental Report
A more rounded consideration here would be 'Will the key characteristics and special qualities of the landscape and scenic value be maintained, enhanced or lost?' For many policies, the sensitivity of this objective should be medium, rather than low, given the high quality and sensitivity of the Highland landscape.	Noted. This will be brought forward in the revised environmental Report
With regard to landscape, it is not absolutely clear why the sensitivity measures for SEA objectives vary between policies. It is presumed this is because this measure does not reflect inherent sensitivity, but sensitivity of the individual SEA objective to the particular policy. It would be useful to make this clearer and also to provide a definition for the sensitivity and impact levels to avoid misunderstanding. In addition there seems to be an assumption that, if the alternative presented is the status quo, potential impacts will be neutral (=). However, in some situations, the condition/ quality of the landscape is deteriorating or under threat. Thus it is suggested, in these situations, that following the existing approach would actually result in negative effects (-), e.g. renewable energy (13) in relation to wild land (3).	Noted. This will be brought forward in the revised environmental Report
3. We would favour the use of a +/- score where appropriate. This will reflect the reality of the uncertainty present in some situations of a high-level plan and allow for more thorough assessment. For example the likely effect on biodiversity or green networks is often uncertain – especially so for green networks where identification work still needs to be carried out – but with the right policy approach negative effects can be avoided. Such policy approaches can be set out in the SEA and taken across to the Proposed Plan. On other occasions a + score has been assigned on the basis of a long term outcome (e.g. minerals in terms of afteruse) but there would be negative (-) impacts in the short/medium term while the mineral was being extracted. Therefore a +/- scoring would describe this more clearly and allow mitigation to be considered for the short/medium term.	Noted. This will be brought forward for work on future SEAs
4. On many occasions a neutral (=) score has been assigned because of an assumption of 'standard' or 'appropriate' mitigation. However this mitigation is not clearly set out and so it will be difficult to see how it is translated across into the Proposed Plan. It would be more transparent and helpful if a negative (-) score or +/- score was identified first, and then the mitigation set out in the final column of the matrix (as already discussed above) to offset this	Noted. The RER and the proposed plan will set out clearer mitigation.

negative score. The mitigation may be no more than a reference to another policy, but this would help to see a process taking place via the SEA and a link across to the Proposed Plan.	
5. The proposed crofting policies raise particular issues as highlighted in this SEA. They are acknowledged as difficult and complex. We are not convinced that the scoring for the crofting policies re landscape and biodiversity reflects the complexity of the balance or arguments. It would have been helpful if this had been a matter identified via the SEA as particularly complex and so needing careful justification in the Main Issues Report. However little supporting text appears in the MIR to provide background to the preferred options for subdivision of crofts, allocation of inbye land, new crofting townships and small scale new crofts. The Proposed Plan therefore will provide a further opportunity to cover this more thoroughly via the SEA. We would be happy to discuss this further with you, perhaps jointly with the Crofters Commission and Highlands and Islands Enterprise.	Noted. As the detailed policy develops in the Proposed Plan we will be able to SEA this in more detail, however without having specific location of proposals it may be difficult.
Appendix 5 Site Assessments Despite the environmental baseline data listed earlier, we have noted various errors and omissions which are set out below. With regard to protected species, we refer you again to the NBN Gateway (www.nbn.org.uk), although there are limitations as noted previously.	Noted. This will be brought forward in the revised environmental Report.
<u>East Inverness</u> Q.17 The assessment states that allocations will not affect designated areas. However the allocations are close to, and have the potential to affect, the Inner Moray Firth SPA/ Ramsar, the Moray Firth SAC and the Longman and Castle Stuart Bays SSSI.	Noted. All site assessments will be revised for the RER and this comment will be taken on board.
Q.18 The assessment states that the allocations will not affect any priority species or habitats. However otters, bats and badgers are present in the area. Breeding birds are also present.	Noted. All site assessments will be revised for the RER and this comment will be taken on board.
There is a need for some habitat development work in the Beechwood area of the East Inverness development, although this information isn't easy to fit into the SEA format.	Noted.
<u>Nairn/Delnies – ED1, ED2, GC1, H1-7, HO1, M2</u> Q.17 The assessment states that allocations will not affect designated areas. However the allocations are close to and have the potential to affect the Inner Moray Firth SPA/ Ramsar site and the Whiteness Head SSSI. Our advice at the outline planning stage is that the effects of the development proposal on the qualifying interests are likely to be significant.	Noted. All site assessments will be revised for the RER and this comment will be taken on board.
Q.18 The assessment states that the allocations will not affect any priority species or habitats. Our advice is that there may be impacts on the following: <ul style="list-style-type: none"> • European Protected Species (EPS): <ul style="list-style-type: none"> - otters (may be present) - bats (roost and may hibernate in buildings on the site). • Annex I Habitats: <ul style="list-style-type: none"> - Decalcified fixed dunes with <i>Empetrum nigrum</i> 	Noted. All site assessments will be revised for the RER and this comment will be taken on board.

<p>- European dry heaths</p> <ul style="list-style-type: none"> • Nationally protected species: <p>- badgers known to be present</p> <p>- red squirrels (suitable habitat exists within development footprint)</p> <ul style="list-style-type: none"> • Species and habitats listed in the UK Biodiversity Action Plan and Inverness and Nairn Local Biodiversity Action Plan (we can provide further details of species and habitats if required). 	
<p><u>Nairn/Delnies – ED3, H10, H11, OS2</u> Q.17 These sites are close to Kildrummie Kames Site of Special Scientific Interest.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p>The proposed route of the Nairn bypass is not shown on the map or assessed in this SEA. The route as indicated in the MIR passes through the NE end of the Kildrummie Kames SSSI (geological here).</p>	<p>Noted. The SEA did not assess the route of the bypass, this route was indicative and is subject to detailed design by Transport Scotland. In discussions with Transport Scotland we will ensure that the route takes all possible measures to avoid affect on the SSSI.</p>
<p><u>Tornagrain - M1</u> Q.17 The assessment states that the allocation will affect natural heritage designations but suggests that the impact will be neutral. Our advice at the planning stage:</p> <ul style="list-style-type: none"> • Potential impact on Moray Firth SAC, Inner Moray Firth SPA/ Ramsar, Loch Flemington SPA, Longman & Castle Stuart Bays SSSI and Kildrummie Kames SSSI but mitigation that was proposed (at outline planning stage) will minimise likelihood/significance of impacts • Ancient Woodland of Long-Established Plantation Origin within site and if removed/ damaged during construction could result in negative impact on this interest. • Dry dwarf shrub heath (a habitat listed on Annex I of the EC Habitats Directive (1992)) present within the site but we understand that this is to be retained. 	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p>Q.18 The site assessment states that there may be protected species in the area and survey may be required. Our advice at the planning stage:</p> <ul style="list-style-type: none"> • otters present but mitigation that was proposed (at outline stage) should ensure impacts minimised/ avoided • bats present and tree felling and work on buildings may affect the bats • badgers will be affected, BPP prepared • squirrels present, mitigation has been proposed • breeding birds present/ affected, mitigation proposed 	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p><u>Dalcross – B1</u></p>	<p>Noted. All site assessments will be revised for the</p>

<p>Q.17 The assessment states that this allocation will not affect designated sites or areas important for nature conservation. However:</p> <ul style="list-style-type: none"> • the allocation is close to, and has the potential to affect, the Inner Moray Firth SPA/Ramsar, Moray Firth SAC and Longman and Castle Stuart Bays SSSI but mitigation proposed (at outline stage) will avoid/ minimise impacts. • Ancient Woodland of Long-Established Plantation Origin within the site. Indication at outline planning was that some of this woodland would be lost but compensation planting carried out. Also potential for damage to woodland during construction. 	<p>RER and this comment will be taken on board.</p>
<p>Q.18 The assessment states that the allocation will not affect any priority species or habitats. However otters, bats, badgers, red squirrels and birds are present within the site. Mitigation proposed at outline stage will avoid/ minimise impacts.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p><u>Whiteness - M2</u> It is unclear why this is included in the SEA when it is not shown in the Main Issues Report. However a cumulative assessment taking Whiteness into account is essential.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p>Q.17 It is stated that the Moray Firth SAC will not be affected by this allocation. This is incorrect, with an appropriate assessment being carried out in respect of the proposed marina and the bottlenose dolphin interest.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p><u>Nigg – B1</u> Q.17 There is missing information about the designated areas adjacent to the site. The proposal is bounded by the Cromarty Firth SSSI, SPA and Ramsar (their boundaries are the same). The Moray Firth SAC is also very nearby.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p>We have provided advice to the Council in respect of the Nigg Development Masterplan. Our current advice on this case is likely significant impact on the Moray Firth SAC and the Cromarty Firth SPA and Ramsar. We are unclear how a neutral (=) score has been concluded here. It is stated that ‘appropriate measures will need to be employed to ensure that the sites are not damaged’. However there is no information provided as to what these appropriate measures will be. See earlier point re neutral scores being assigned on the assumption of unspecified mitigation. In recent correspondence with the Council regarding the appropriate assessment (Habitats Regulations Appraisal) of the masterplan, we have advised that there are five activities which as a consequence of the approval of the Masterplan are likely to have a significant effect on the Natura site interests and therefore subject to Appropriate Assessment. Specifically they are:</p> <ol style="list-style-type: none"> a) Dredging and disposal operations b) Vessel disturbance and noise pollution c) Ship to ship, ship to shore and ballast water discharge d) Piling and construction noise and vibration 	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>

<p>e) Pollution We have also provided advice to the Council on appropriate mitigation at this stage in the form of requiring Management Plans for approval prior to the commencement of any development e.g. a dredging and disposal plan. Depending on the stage reached with the appropriate assessment of the masterplan when the HWLDP Proposed Plan is published, suitable reference should be made to mitigation.</p>	
<p>Q18. This is answered as negative, but this proposal has the potential to impact on: <input type="checkbox"/> European Protected Species (EPS): o Dolphin – as per SAC o otters (may be present) 19 B449692 o bats (roost and may hibernate in buildings on the site). <input type="checkbox"/> a number of BAP species. In addition there may be terns breeding on site – common terns are a qualifying interest of the Cromarty Firth SPA. Therefore surveys will be required to inform development and appropriate mitigation.</p>	<p>Noted. All site assessments will be revised for the RER and this comment will be taken on board.</p>
<p>Appendix 6 Scoping This includes the Council's scoping report but does not include a consideration of the consultation authorities' responses to the scoping and how the Council has taken comments into account when producing the SEA. However we are pleased to note our comments made in terms of the SEA Objectives were taken on board.</p>	<p>Noted. Appendix 6 has now been replaced by this document taking into consideration all of the comments received on the ER at the MIR stage.</p>
<p>DETAILED COMMENTS ON APPENDIX 4 SEA ASSESSMENT MATRICES FOR POLICY APPROACHES Spatial Strategy as a whole (pp3 – 26) It is unclear why Objective 7 re soil quality and quantity is scored so positive given the amount of proposed greenfield development in the A96 corridor. Note this is scored negative under the A96 corridor section.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Inverness (pp27 – 71) It is disappointing that the City Vision is neutral with regard to biodiversity or green networks (1 and 2) – this is a chance to improve the environmental coverage of the plan.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Re landscape character and distinctiveness (16 and 17) the positive assessment is rather based on built form and design, and ought to consider also the wider setting of Inverness and how the landscape character as a whole will be affected by growth. Reference is made to an updated 'city vision' and supplementary guidance. Given this does not yet exist, the basis of the assessment is unclear. The reasoning behind the = or + impacts is not demonstrated and it is not clear how the distinctiveness of the landscape can be enhanced, including in relation to the river, canal, coast and green spaces, or how existing negative effects can be mitigated.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>

<p>The alternative in the MIR appears to be less expansion of Inverness and more short term development of the A96 corridor. There is quite a bit of negative scoring for this option, but why would this be any more negative than the spatial strategy and the A96 corridor which propose development anyway in this area? Is it a matter of being less planned?</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>A96 Corridor (pp72 – 119) Re biodiversity and habitats (1) it may be more realistic to score this as +/- since the SEA is unable at this stage to say whether protected species or important habitats are present on development sites, and so the SEA refers to ‘appropriate mitigation’ in such cases. See elsewhere about querying what this mitigation will be and how it will be translated into the Proposed Plan. It would be helpful to see the proposed policy mitigation for species – e.g. a survey, reference to any guidelines, cross reference to protected species policy.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Similarly for green networks (2), since the concept for the A96 corridor area is only now being developed, it is too early to say whether the proposed developments will affect or not existing areas for the movement of wildlife or people, or provide opportunities for their enhancement. A +/- scoring at this stage would be more realistic.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>It is very surprising that Objective 14 re reducing the need to travel and promoting modal shift is considered as low relevance here, given the volume of proposed development along the A96. Some more assessment would be worthwhile here, although there may be a cross reference to the Local Transport Strategy.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Alternative 1 It is unclear why the alternative of focussing development around Inverness may lead to less provision of open space (SEA Objective 4) – the Council’s open space policy would equally apply? See comment re Objective 14 which applies here too – might the alternative offer a different perspective on travel distances and modes?</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Alternative 2 1 – scoring more accurately should be +/- as at this stage it is not possible to assess whether dispersed growth areas will have biodiversity value.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>2 – the green networks concept could equally be applied to the dispersed growth option i.e. take Inner Moray Firth as a whole rather than just the A96 corridor – so it is not correct to say it is of low relevance and to score as neutral. It could with the necessary policy backing be scored as positive.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>3 – the dispersed option may allow for more contact with natural environments, given growth would be dispersed over a wider area of Highland with its surrounding natural heritage. However the details are uncertain at this stage and so a +/- score once again may be more realistic, with alternative assumptions provided.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>

<p>5 – there is an error here in terms of the assessment considering travel rather than open space. Open space is probably neutral under this alternative, as the Council's open space policy will equally apply.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Developer contributions in the A96 (pp120 – 146) The potential positive scores for biodiversity and green networks as well as open space are recognised, but this does depend on the revised developer contributions protocol for the A96 corridor enabling contributions to be secured from developers for wider beneficial projects within the green framework such as tree planting or habitat management as well as the provision of more conventional open space and construction of paths/cycleways.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>East Inverness (pp147 – 179) 1 - To score =/+ for designated sites and biodiversity assumes green networks are in place for example to divert any recreational pressure of the additional 7250 population away from the coastal area which is designated as SPA. It also assumes water quality measures are in place for discharge of waste water to the Moray Firth re the SAC. Such mitigation ought to be clearly set out. Otherwise a -/+ scoring is more realistic with discussion of mitigation thereafter. See comments under Appendix 5 re protected species – badgers, bats and otter present – also breeding birds.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>2 - Re green networks the =/+ score assumes no existing green networks would be affected by the proposed allocations. Since the green network work has not yet been carried out, this assumption cannot yet be verified. The + score therefore looks more to the desired enhancement of green networks than their maintenance. This will need to be monitored as the Proposed Plan is progressed. As elsewhere a +/- scoring would be more realistic, setting out the assumptions behind a – or a + score and so leading towards a policy inclusion that favoured the latter.</p>	<p>Noted. Green Networks project has since progressed and will inform the proposed plan. The re-assessment of this part of the SEA will take this into consideration.</p>
<p>3 – it is unclear why this Objective re providing opportunities for people to come into contact with natural areas is viewed as of low relevance in terms of Inverness East. Is this because this objective is skewed towards wild land? On the face of it, a residential area surrounded by the A9, the A96, the Retail and Business Park, the railway, and Culloden needs careful consideration in terms of greenspace opportunities. Although it says 'suitable mitigation will be secured' what does this mean in practice? Of the 13ha of open space proposed, how much will be of a natural environment where nature can be appreciated?</p>	<p>Noted. As previously mentioned we will clarify mitigation in the Revised Environmental Report.</p>
<p>7 – it is unclear how soil quantity and quality may improve in the longer term when agricultural land is lost to development in the shorter term.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>16 and 17 – re landscape it is unclear why this is considered of low relevance for Inverness East. Mitigation in terms of structural landscaping could have been discussed here.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>

Alternative 1 – see above for specific comments on protected species on the first phase sites (these aren't clearly identified within the overall Inverness East map) – including badgers.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 – see comments above	
7 – it is unclear why safeguarding of soil quantity and quality is scored as neutral for the alternative when even presumably the phase one sites will involve some development of greenfield sites	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – see comments above re landscape	
Nairn (pp180 – 210) 1 – see comments under Appendix 5 re designated sites and protected species affected by these proposals.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
There will be an effect on the Kildrummie Kames SSSI which is not assessed here. The bypass route would go through the NE end of this SSSI (geological here).	As previously mentioned the SEA did not assess the route of the by-pass, this route was indicative and is subject to detailed design by Transport Scotland. In discussions with Transport Scotland we will ensure that the route takes all possible measures to avoid the SSSI.
There may be some recreational pressure on the Whiteness Head area (Inner Moray Firth SPA) – this is not taken into account here – nor the cumulative effect with the Whiteness development.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
2 – re green networks – until the green network work has been carried out for the Nairn area it is too early to say if existing green networks for wildlife and people have been maintained – for example the proposed bypass route to the south passes between woodland areas and crosses the River Nairn. So at best the score here is more likely to be +/-, until such times as the proposed green network framework has been put in place.	Noted. Green Networks project has progressed and the results of this will be considered when we progress the revised environmental report.
3 – re opportunities for appreciation of the natural environment – why has this been deemed of low relevance for Nairn? Is this because of wild land skewing the issue?	Noted. All assessments will be revised for the RER. This comment will be taken on board.
7 – re soil quality/quantity – once again it's unclear how loss of greenfield land can change from negative to neutral over time. Also this objective should pick up on geodiversity and the direct impact on the Kildrummie Kames (part Geological) SSSI is not included here.	Noted. Impact on Kildrummie Kames will be considered as will geodiversity in the plan making process.
12 - The Inner Moray Firth is an area to consider future sea level rise/storm surge predictions and the effect on use of land and land management near the shoreline.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – re landscape – it is unclear why it is considered this is of low relevance to the expansion of Nairn. Landscape character in terms of the setting of Nairn may be an issue.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Tornagrain (p211 – 233) 1 – see comments under Appendix 5 re designated areas and protected species affected by	Noted. All assessments will be revised for the RER. This comment will be taken on board.

<p>this proposal.</p>	
<p>2 – has it been determined yet whether any existing green networks at Tornagrain would be affected by the proposal?</p>	<p>Noted. Green Networks project has progressed and the results of this will be considered when we progress the revised environmental report.</p>
<p>3 – mitigation could be offered for people at any new settlement at Tornagrain to come into contact with and appreciate natural environments through a programme of open space and greenspace provision. It is unclear why effects will be negative in the short and medium term and only positive in the long term.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>7 – note this is scored negative for long term as well as short-medium term (re soil quality and quantity) – this seems more logical compared to the scoring for this objective for Inverness E and Nairn which are also on greenfield land.</p>	<p>Noted. Clarity and consistency will be offered in the Revised Environmental Report.</p>
<p>16/17 – with negative effects identified for landscape, 'suitable mitigation' would benefit from being more clearly articulated.</p>	<p>Noted. Mitigation will be clearly set out in the Revised Environmental Report.</p>
<p>Smaller settlements in the A96 corridor (pp234 – 254)</p> <p>1 – note the negative score for short and medium term. Agree probably that mitigation will be at the detailed level. Further SEA should be carried out once potential growth sites for these settlements have been identified. However at this stage it would have been worth mentioning the Cawdor Woods SAC/SSSI in respect of Cawdor and the Kildrummie Kames SSSI in respect of Croy.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>2 – note the negative score in the short and medium term. The possible existence of green networks can be considered in more detail when plans move on to identify sites for the growth of these settlements</p>	<p>Noted. Green Networks project has progressed and the results of this will be considered when we progress the revised environmental report.</p>
<p>3 – note the negative score in the short and medium terms. This should be considered more at the detailed site selection stage.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>6 – again, consider rights of way and core paths at the detailed stage to avoid negative effects.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>7 – re geodiversity the Ardersier Glacial Deposits SSSI in relation to possible future growth of Ardersier can be noted here.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>16/17 – consideration of landscape with regard to the smaller settlements in the A96 corridor will need to have regard to the differing landscape character of higher settlements such as Culloden Moor, wooded settlements such as Cawdor and coastal settlements such as Ardersier.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Caithness and North Sutherland (pp255 – 269)</p> <p>1 – this was clearly assessed before the North Caithness Cliffs marine extension to the seabird SPA. There is potential to impact on this designated site, amongst others, and this needs to be recognised. This proposal includes support for marine renewables in the</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>

Pentland Firth, so it would be helpful if parameters for the maintenance of marine biodiversity and protection of designated areas were set out. Perhaps more realistically the scoring at this stage would be +/- to indicate the uncertainty, and then consider mitigation to avoid the negative outcome.	
2 – this is scored neutral, but will a green network programme be rolled out from the A96 corridor to cover Caithness and North Sutherland? Without positive efforts to identify existing and potential green networks this SEA Objective may not be achieved.	Noted. A decision will be made on the build out of the Green Network Model prior to the publication of the proposed plan.
16 – it is unclear how the Main Issues Report has demonstrated that the landscape diversity and local distinctiveness of Caithness and North Sutherland will be positively affected by the proposals.	Noted. This information will be presented in the Proposed Plan.
In general terms the quality of the local environment and landscape needs to be better recognised and assessed. ‘Appropriate mitigation’ needs to be strengthened in the policies with clear commitment to decommissioning and restoration for Dounreay.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Nigg and Easter Ross (pp270 – 283) 1 – see comments under Appendix 5 with regard to designated sites and protected species affected by the Nigg proposal. With regard to other as-yet unspecified proposals in Easter Ross, at present it is unclear how this can be scored as neutral effect when the specifics of strategic economic development sites in the Cromarty Firth are not known. For the Cromarty Firth as a whole an important issue to consider is the Cromarty Firth SPA. It would seem more logical at this stage to score this as uncertain (??) impact. The Proposed Plan and its SEA will enable more site specific issues with regard to proposed development near the Cromarty Firth and possible effects on designated sites, protected species and wider biodiversity to be considered.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
2 – Once again, unless there is a commitment here to apply the green network concept to planning for the Easter Ross area (i.e. identify and protect existing green networks, and enable them to be expanded and improved and enhanced re connectivity) it is difficult to see how this can be scored as neutral. So such a policy link would be encouraged by a +/- score and mitigation consideration.	Noted. A decision will be made on the build out of the Green Network Model prior to the publication of the proposed plan.
4 – the link between Nigg’s redevelopment and improved health is more a socio-economic than an environmental matter. Here should be any consideration of possible noise or pollution from industrial activity.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – The Cromarty Firth is an area to consider future sea level rise predictions and the effect on existing natural habitats, use of land and land management near the shoreline.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 – the design quality policy should be cross referred here.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Development of local centres (pp284 – 300)	Noted. All assessments will be revised for the

<p>It would appear as though this proposal is entirely dependent on the three Area LDPs for taking forward – other than the HWLDP defining a settlement hierarchy which in itself is not likely to have any effects. Cross referencing to policies that will dictate the spatial work within the Area LDPs for selection of sites for the development of settlements should be included.</p>	<p>RER. This comment will be taken on board.</p>
<p>Wider Countryside and Fragile Areas (pp301 – 317) 1 – the positive scoring re biodiversity is arguably too skewed by the protection for designated areas under the proposed policy approach of international, national and regional/local features. The proposed policy itself for the wider countryside beyond these features is included as an Appendix to the MIR and does not include any reference to wider habitats and species outside designated sites. Therefore on the contrary this SEA objective ought more completely to be scored +/-, with a consideration then of the proposed policy in the Appendix with a view possibly to adding an extra bullet point viz – “Outwith SDAs development proposals will be assessed for the extent to which they protect and enhance the biodiversity of habitats and species”.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>2 – the neutral scoring re green networks assumes a policy in place for the wider countryside that maintains, enhances and creates green networks. This is unclear at present and the Council may wish to consider for example whether identified green networks should be a regional/local feature in the general heritage policy.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board. Green networks will not be identified as a regional/local feature in the HwLDP.</p>
<p>3 – it could be argued that ‘providing opportunities’ for access would need a more pro-active element within this approach, which is actually left to other policies. So a neutral score with referral then to other policies may be more appropriate.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>7 – (soil) it is unclear why this is scored positive when much of the development under this approach by its nature will be ‘greenfield’, albeit that the soil quality is likely to be poor.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>14 – (reducing the need to travel) – it is unclear how a strategy that allows for housing in the countryside will reduce the need to travel and hence be scored positive. Perhaps a negative score would have led to consideration of means to assist accessibility to services in other ways, e.g. mobile services or novel forms of public transport.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>16/17 – (landscape) – it is noted that a neutral score assumes compliance with design guidance for say housing in the countryside. The link through policy or supplementary guidance should be made clear.</p>	<p>Noted. Clarity on this will be provided through supplementary guidance.</p>
<p>Housing land requirement supply (pp318 – 345) Setting a housing land requirement figure for the next 20 years is a very ‘high level’ exercise. It lends itself to alternative scenarios both in terms of total growth and distribution. However perhaps different SEA Objectives should be selected for this very high level and strategic component of the plan that are themselves of a higher level nature. The identification of land for delivery of housing projection is a matter for the Proposed Plan itself or for the Area LDPs.</p>	<p>Noted.</p>

Therefore it is inevitable that many existing SEA objectives at this stage will be assessed as neutral.	
4 and 14 – in terms of human health and reducing the need to travel, following on from the above it would be imagined that no assumption can be made about the location of the housing land supply and so no assumption can be made about increased ability to walk or cycle.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
5 – in terms of open space, unless a high housing land supply ‘unlocks’ open space provision to an extent that is less likely with lower housing land supply levels, it seems unclear why a positive score has been given here. In itself as discussed above this part of the MIR is neutral.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
7 – in terms of soil quality this is scored positive because housing will be encouraged on brownfield sites. However the ‘high’ option of 34,152 houses to 2029 presumably implies the most greenfield land uptake too. So the positive score for this high growth option is unclear and a +/- score may be more appropriate.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative No numbers are given here of what a lower growth housing land supply scenario would imply in terms of housing units to 2029. Greater opportunity could have been taken at this MIR stage to offer genuine alternatives for housing growth in Highland over the next 20-30 years. This may have to be picked up again within the SEA for the Proposed Plan by setting out figures for the population and housing growth projection scenarios at low, medium and high levels.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
By and large, using the SEA Objectives employed for the rest of the MIR, the same scoring would be anticipated for these two options, as they are both very ‘high level’ despite one being ‘high growth’ and the other being ‘lesser growth’.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 – it is unclear why this objective re landscape character and distinctiveness has been scored as very negative when for the higher growth scenario it is scored as neutral. At this very high level the effects are likely to be the same and so a neutral score seems as appropriate here.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Housing in the Countryside (pp346 – 385) 1 and 2 – see notes above re biodiversity and green networks in the context of wider countryside – relevant also for that part of the wider countryside that is in the hinterland around towns.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 - in contrast to the statement made, this policy is relevant to this objective - specifically the layout and extent of housing so that it is easy to see and access surrounding areas with wildness qualities.	Noted. This will be clarified through supplementary guidance to the proposed plan and will be considered in the revised environmental report.

4 – re human health it is slightly tenuous to score this positive because of the rural lifestyle since this also implies greater distance to hospitals, dentists, doctors, pharmacies etc. A distinction should be made between social and environmental impacts, the latter being relevant for SEA.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
5 and 6 – these are scored as neutral which seems correct, and yet the ‘justification’ reads as if there would be a positive effect on open space and access, which does not appear correct. Since developer contributions for open space provision would presumably not be received for single housing developments in the countryside, this is a possible slight negative effect?	Noted. All assessments will be revised for the RER. This comment will be taken on board.
7 – re soil quality/quantity it is unclear how housing in the countryside can take place on brownfield sites and so a positive score be given here. More likely would be development on greenfield sites so affecting soil quality and quantity. Mitigation if necessary could consider the housing in the countryside policy including consideration of effect on any agricultural unit.	Noted. Some housing in the countryside can be located on brownfield sites, this will be clarified in the revised environmental report. It may be more suitable to give this element of the assessment a neutral score. All assessments will be revised for the RER. This comment will be taken on board.
14 – re reducing the need to travel, once again it is unclear how this can be scored as positive when the necessary services etc are likely to be in the towns while the housing allowed for takes place in the hinterland. Mitigation could be in the form of linking to public transport and active travel provision but this link is presently unclear. The positive score for the alternative of a more restrictive housing in the countryside approach would appear to confirm that this more enabling approach should be scored as neutral-negative.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – there seems to be a reliance on mitigation through siting and design, although this is not always possible. Cumulative impacts should also be discussed, and there should be reference to landscape capacity studies. It is not possible to assess impact against design guidance not yet produced. Re 17 why is this assessed as low relevance? This topic is of key relevance to the SEA objective. The proposed policy on housing in the countryside is significant in relation to maintaining landscape character and scenic value.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative 2 1 – it might be imagined that a less restrictive approach to housing in the countryside might have a possible negative effect on biodiversity unless the relevant policy protected important habitats and species, or cross referred to a relevant policy. It may be clearer therefore if a negative score was assigned here with mitigation then expressly included in the proposed policy (see MIR Appendix and note on this above) or cross reference to proposed biodiversity policy elsewhere in the Proposed Plan.	Noted. This will be re-visited in the revised environmental report.
2 – re green networks see comments above	Noted.
4, 7 – see above	Noted.
14 – it is unclear why this has not be scored as negative, rather than uncertain, since a less	Noted. All assessments will be revised for the

restrictive policy on housing in the countryside is likely to increase the need to travel, as is indeed noted in the justification column.	RER. This comment will be taken on board.
16/17 – re landscape the scenario could be considered where a less restrictive housing in the countryside policy does begin to affect local landscape character. Hence consideration could be given to whether the Design Guidance would be able to offset this. The MIR page 37 says that this alternative ‘could lead to the development of additional housing in locations which are not suitable’, which implies more of a negative than a neutral score.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Affordable housing (pp386 – 425) No comments.	Noted.
Planning for an ageing population (pp426 – 464) No comments.	Noted.
Gypsies/Travellers (pp465 – 490) 1 – the assumptions re the tests for sites relate to designated areas only – the tests would need to cover wider biodiversity interests in order to be scored as neutral – otherwise a possible negative score would have to be given here.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
2 – this too might be negative if sites are allocated within green networks – so mitigation to link to a policy re green networks here would be helpful.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – again the assumption is that general policies for landscape would enable any adverse effects of gypsy/traveller sites to be avoided, and so on this basis a neutral score is given. The alternative approach as discussed elsewhere might be for a negative score to be given to start with, with explicit mitigation then being identified to include landscape as a test criterion.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Retailing (pp491 – 530) No comments.	Noted.
Developer contributions (pp531 – 556) 2 – re green networks this is scored as neutral, which implies that developer contributions will not be sought for the maintenance, enhancement or creation of green networks for wildlife and people. This would seem a missed opportunity, and emerging policy for green networks could consider how developments should relate to present and potential green networks. This should include the situation where a fragmentation of an existing green network may occur, and compensatory provision should ideally be secured as part of the development package. The ‘alternative’ would then be scored neutral or negative for objective 2 re green networks, as it is very unlikely that developer contributions would be secured for this on an ad hoc basis	Noted. All assessments will be revised for the RER. This comment will be taken on board.
14 – re transport it may be more accurate to score this as +/- rather than neutral, since some developer contributions will favour car travel e.g. road improvements, while other developer contributions will favour public transport and cycling/walking.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – if developer contributions are to include landscaping, as per the indicative list on p43	Noted. All assessments will be revised for the

of the MIR, then it would be expected that these should be scored as positive rather than neutral.	RER. This comment will be taken on board.
Natural, built and cultural heritage (pp557 – 583) 2 – re green networks, there is an indirect link with biodiversity, and so the positive score is understandable, but a stronger benefit would be created if consideration was given to identified existing functional green networks for wildlife being identified as a local/regional feature and protected as such under the Council's proposed 3-tier policy.	Noted. Green Networks will sit within their own policy framework taking into consideration this point but will not be identified through the natural, built, cultural heritage approach.
3 - this justification is very vague and there is no clear explanation how impacts are predicted to occur.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – here again is a link to green networks (in the context of climate change adaptation) but at present it appears to be the intention from the MIR that green network policy in the Proposed Plan will be under a “Health” section because of the relationship with paths/cycleways and hence active travel. It would be stronger in terms of green networks and climate change adaptation for species if policy was also in the natural heritage and climate change sections of the Proposed Plan.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
13 – although a negative score has been given for renewable energy development because of policies for the natural heritage, it may more strictly be appropriate to consider if attainment of the Council's renewable energy target would be jeopardised by the policy. If it is considered that the Council can still deliver its target for future renewable energy generation alongside the proposed protective policy for the natural heritage, then is it reasonable to assign a negative score here (bearing in mind that the SEA is assessing environmental rather than socioeconomic effects)?	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – these are scored as positive which presumably reflects the intended policy approach of identifying national and local/regional landscape features. However the MIR does not indicate what policy approach the Proposed Plan will take with regard to landscape character generally, and so in this context the proposed scoring is unclear. It would be stronger if the MIR included a policy option approach for landscape character, and so this should be added as the Proposed Plan is prepared.	Noted. All assessments will be revised for the RER. This comment will be taken on board. This will be made clearer in the proposed plan as the policy is formulated.
Alternative 1 – the weakness of this approach with regard to biodiversity outwith designated sites has been identified, and so more accurately a ++/- score could have been given here (negative for biodiversity more generally)	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Previously used land (pp584 – 623)	Noted. All assessments will be revised for the

1 - some biodiversity may occur on brownfield land, so the need for possible surveys should still be considered here.	RER. This comment will be taken on board.
7 – re reduction of contamination, safeguarding of soil, and re-use of brownfield sites, it is surprising this is scored as neutral. The assumption is that this proposal in the MIR would score positively against this SEA Objective.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Two alternatives are assessed, but no alternatives are set out in the MIR – so this should be clarified.	Noted. In some cases we found it appropriate to have the alternatives assessed however they were not found reasonable following assessments and therefore not included in the MIR.
Wild Land (pp624 – 650) 1 - a key concern is where structures are developed in wild land areas to aid management to achieve biodiversity targets, e.g. deer fencing and access tracks.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
2 - for some wild land areas, habitat enhancement (change) may be required to improve its value as a green network as many areas have ‘impoverished’ vegetation (e.g. reduce muirburn to allow establishment of trees)	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 - satisfying the objectives will relate to the supplementary wild land study and guidance. It is difficult to identify impacts beforehand.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
10 - wild land areas may correspond with water catchment areas that would benefit from the minimal intervention/ disturbance that may result from protection of these areas.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – (reduce vulnerability to effects of climate change) - this could be scored positive on the consideration of facilitating species adaptation, as wildland areas can form part of larger scale green networks for species movement. Protection of wild land areas may provide a ‘reserve’ that also provides benefits in terms of natural drainage and species migration.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
13 – re negative scoring in terms of increasing the proportion of energy from renewable sources, this would only be negative if other sites elsewhere for wind and hydro schemes were unavailable in order to meet local targets. Note also this is only likely to act as a constraint around the edges of wild land areas and the surrounding landscape, as interior areas are typically not targeted for development due to the fact that they have limited access and no other infrastructure.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Water environment (pp651 – 676) No comments	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Renewable energy (pp677 – 711) The separate exercise of an SEA for the Highland Windfarm Spatial Framework (per SPP6) will be very important, and it is presumed that a separate scoping exercise will take place for this.	Noted.
1 – rather than score as neutral it is probably more realistic to say that effects on biodiversity	Noted. All assessments will be revised for the

could be negative, but that suitable mitigation in the form of 'sieving criteria' would be included in the supplementary guidance to offset this	RER. This comment will be taken on board.
2 – re green networks – ditto – scored as neutral but it would be more helpful if the possible positive and negative effects were more openly considered, with mitigation set out as necessary	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 – re wildness – ditto – scored as neutral but this depends on a policy framework for the identification and protection of areas that have wild land qualities. This justification does not correspond with previous assessment with regards to the relationship between wild land and renewable energy. While impacts will depend on location, siting, design and cumulative impacts, an overall judgement is that this policy will have a negative impact on SEA objective 3.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
5 – it is unclear how a reservoir for hydro development would have an impact on open space. It is assumed that open space in this context relates to more populated areas in Highland. The neutral scoring seems appropriate here.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
6 – re access – scored as neutral, but a +/- scoring on the basis that renewable energy developments could have a positive or a negative impact on access would allow best practice to be considered and hence included in policy.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – scored as neutral – although not strictly concerned with reducing vulnerability to the effects of climate change, perhaps consideration could be given here to location of renewable energy developments on peatland in terms of greenhouse gas release from disturbance of peatland	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – negative effects on landscape noted, together with commentary on possible mitigation. There is a strong reliance on subsequent spatial planning. To limit impacts to the levels predicted, this must set out capacity in relation to these objectives, not just sensitivity, and incorporate cumulative assessment of existing developments and potential future scenarios.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative The alternative would appear to be a 'market and technology led' approach, and so potential negative impacts may be harder to mitigate in a proactive fashion.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Flooding (pp712 – 738) No comments	Noted
Waste management (pp739 - 773) No comments	Noted
Air quality (pp774 – 787) No comments	Noted
Sustainable design (pp788 – 800)	Noted. All assessments will be revised for the

1 – the proposed supplementary guidance on sustainable design and residential layout should preferably have a positive rather than a neutral effect on wider biodiversity, e.g. associated greenspaces	RER. This comment will be taken on board.
4 – human health – the justification for a positive scoring here is that sustainable design will apply to housing in rural areas, but it is equally important that sustainable design principles should apply to housing developments in urban areas	Noted. All assessments will be revised for the RER. This comment will be taken on board.
5 - the proposed supplementary guidance on sustainable design and residential layout should preferably have a positive rather than a neutral effect on open space e.g. associated greenspaces	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 - the proposed supplementary guidance on sustainable design and residential layout should preferably have a positive rather than a neutral effect on landscape e.g. associated greenspaces	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Business and industrial land (pp801 – 826) 1, 2,16 and 17 – negative scores are given here for biodiversity, green networks and landscape. Justification is either/or (a) outweighed by employment benefits and (b) enhanced mitigation could be secured. However (a) is not a matter for SEA and (b) it would be more helpful if the SEA could be more specific with regard to the enhanced mitigation that would reduce these negative impacts (e.g. compensatory provision).	Noted. All assessments will be revised for the RER. This comment will be taken on board. We understand it is not the role of SEA to take these into consideration but the intention of including this is to provide a more general commentary of things that were considered in the preferred option.
Alternative There is no discussion following the assessment of the alternative of concentrating business and industrial development on land identified for this use in the HWLDP. This scores better, with no negative effects for say biodiversity and landscape. While any justification of selecting the preferred option on the basis of economic growth is not a matter for the SEA, the ‘enhanced mitigation’ discussed should be more clearly set out for transference to the Proposed Plan, and any residual negative effects should be flagged up for likely monitoring.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Accessibility and Transport (pp827 – 851) A separate SEA is being undertaken for the Local Transport Strategy, and so it would be helpful if the relationship between SEAs for the MIR/Proposed Plan and the LTS was clarified here. Presumably it is a matter of level of detail.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
1 – while biodiversity effects are scored as neutral, the identification of priority transport routes for investment could have negative effects if the routes so identified pass through sensitive areas for biodiversity. However this is more a matter for the Proposed Plan and the LTS, with the SEAs for these proposing mitigation if necessary. Perhaps it would be more realistic at this stage to score as +/- depending on any routes identified and later or parallel SEA work.	Noted. All assessments will be revised for the RER. This comment will be taken on board.

2 – re green networks this is scored as positive because of the promotion of cycling and walking. Perhaps also a potentially negative score should be considered for any new or upgraded road projects given a potential to sever green networks. This could be mitigated by policy cross-references between transport and green network policies.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
6 – once again re access, although the positive potential has been identified, perhaps so too should a possible negative potential should any new road routes temporarily or permanently affect access. Here too a policy cross reference to access policies will provide mitigation.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
7 – re soil quality and peat in particular, road improvements where peatland is adjacent could affect soil quality, so this could be identified as a possible negative effect here and then mitigation provided either here or in the LTS in terms say of best practice construction methods on peatland.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – re reducing the vulnerability to the effects of climate change, consideration could be given here or in the LTS to whether any strategic transport routes may be affected by landslips brought on by heavy rain events.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
17 – it is unclear how the preferred approach will be positive in respect of landscape character and scenic value. This looks to be an error in that the scoring and justification for renewable energy (13) has been copied here under landscape.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Agricultural Land (pp852 – 877) 16 - development of prime agricultural land may reinforce the diversity and distinctiveness of some landscapes, but only where agricultural land of the same character as proposed forms a key characteristic of the landscape. Note the practice of agriculture does not reinforce landscape character in itself – it is the elements/ features associated with this, e.g. hedgerows, farm buildings, the pattern of particular crops. Some of these features could be maintained through continued agricultural practice, but some may be lost.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Sub-division of crofts (pp 878 – 903) This appears to relate to development of housing on croft land. 2 – the justification is tenuous in justifying the positive scoring with regard to green networks – a +/- scoring seems more logical	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – re landscape character and local landscape distinctiveness, the proposal to locate housing on poorer quality croft land is scored here as both potentially positive (16) and negative (17). In terms of mitigation it is stated that a balance will have to be achieved between the two goals of safeguarding good quality croft land and maintaining and enhancing the landscape character of crofting areas. This is a matter that should be considered at the more detailed level within the Proposed Plan and Area Local Development Plans.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative (one house per croft)	Noted. All assessments will be revised for the

<p>This alternative performs better in terms of landscape because siting and design would take precedence over crofting land quality. However the preferred option is that a balance should be struck on a case-by-case basis. If followed through this will be particularly important in certain National Scenic Areas where the crofting landscape is a special quality. More consideration of this is required in the Proposed Plan.</p>	<p>RER. This comment will be taken on board.</p>
<p>Allocation of inbye land (pp904 – 929) This appears to relate to housing development not on inbye land but on common grazings. 1 – common grazings as well as inbye may have biodiversity value, so a caveat to the positive scoring may be helpful.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>16/17 – similarly for landscape, common grazings as well as inbye land may have value in terms of the landscape character of the area (where housing of an inappropriate scale, density and pattern may lessen the character) and so a caveat to the positive scoring may again be helpful.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>The assessment only considers the impact of the preferred option on the inbye land and not on common land. For objectives 1 and 2 there could be negative impacts if common land were to be included. The assessment needs to be re-considered to reflect the impacts of this proposed policy on common land.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>Alternative (greater protection of inbye land) 1 – from the justification and from the positive scoring for the preferred option it would appear that a +/- scoring would be more appropriate here – greater protection for inbye land on the one hand, but less ability to take biodiversity into account in selecting alternative land supply on the other hand.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>16/17 – the positive and negative scores for these questions on landscape is noted which serve to ‘cancel out’ any benefits?</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>The issue of housing development in crofting areas between inbye land and common grazings is highlighted in this SEA as a difficult and complex one. It would be helpful if this SEA flagged this up so that the Proposed Plan and its SEA paid particular attention to this issue, with more detailed analysis probably then necessary in the relevant Area LDPs.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>New Crofting Townships (pp930 – 955) There is no background discussion of the criteria against which a possible new crofting township would be considered, but it is assumed that the new houses would be genuine crofts, on land that is worked as traditional croft land, with a scale and pattern that reflects existing townships.</p>	<p>Noted. All assessments will be revised for the RER. This comment will be taken on board.</p>
<p>1 – re positive biodiversity see above assumption. This assessment needs to consider what</p>	<p>Noted. All assessments will be revised for the</p>

could be lost – the justification is too narrow and simplistic.	RER. This comment will be taken on board.
2 - existing wildlife corridors and networks could be fragmented / lost on common land. New townships will not automatically improve habitat.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 - new townships will reduce wildness qualities if these are within or visible from a wild land area.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 - this proposed policy would increase diversity and distinctiveness, but not necessarily of the same value as existing settlements and wouldn't necessarily protect existing distinctiveness; it would create a new landscape character. It is very difficult how this ambiguity could lead to a measure of ++.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
17 - It is questioned whether new crofting townships would have positive impacts on the landscape. Typically the valued landscape qualities of these areas relate to the 'traditional' features of landscape pattern, such as old houses, field boundaries and small field units; these are unlikely to result from a contemporary development which would have to respond to different priorities and/or expectations, e.g. larger house sizes, access roads and lighting. Such development is thus not likely to conserve and enhance landscape character and scenic value, but introduce a new landscape character type and alternative scenic qualities.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Small scale new crofts (pp956 – 982) 1 – re biodiversity, any felling of woodland to create room for a house on the basis of the house then being available for management of the rest of the woodland could have negative effects which would need to be outweighed by the positive benefits of woodland management of the remainder of the woodland – a +/- scoring would allow this to be considered	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 – contemporary 'crofts' often do not relate to the existing distinctiveness of the landscape and thus will not contribute to the 'maintenance or enhancement' of landscape character. Typically they have a very different relationship with the landscape and may collectively form a new landscape character type or sub-type as per some of the existing LCAs (e.g. Caithness and Sutherland). Capacity for this kind of development should be informed by a landscape sensitivity and capacity study and strategic guidance.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative (more restrictive policy for new woodland crofts) The alternative policy could be better for the natural heritage if applied to agricultural crofts and not forest/woodland crofts.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3/4 – re contact with nature and human health, the negative scores here are only in relation to the other option of allowing woodland crofts more liberally – in itself this option would not create negative effects. Care needs to be exercised in scoring as to whether it is an absolute or a relative scoring being made. Thus in itself this option is neutral for these objectives.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Coastal development (pp983 – 1005) A separate SEA has been carried out for the Coastal Development Strategy and we have	Noted.

commented separately on this.	
1 – this positive scoring for biodiversity is on the basis of aquaculture framework plans. However the preferred option makes no reference to AFPs. Instead it talks about a general policy for fish farming that could be delivered through supplementary guidance. This should be clarified.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
6 – this positive scoring for access is made on the basis that the proposed general policy for aquaculture will encourage maintenance and enhancement of water-based recreation and onshore access to slipways. This is to be welcomed, and looks forward to the Proposed Plan. However in itself the preferred option to have a general policy or supplementary guidance covering aquaculture is neutral in terms of environmental effects, unless assumptions are made and clearly set out here.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – the neutral scoring re reducing vulnerability to the effects of climate change could be strengthened if more consideration was given to coastal flooding (including sea level rise, surges and wave energy), particularly for the Inner Moray Firth	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – once again in scoring positively for landscape and scenic effects, assumptions are made as regards references to landscape character assessments and best practice landscape guidance notes being included in the proposed general policy for aquaculture. This should be followed through into the Proposed Plan.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative – spatial locational strategy Highland-wide for aquaculture 6, 16 and 17 – re access and landscape it is unclear why these are scored neutral whereas they are scored positive for a more generalised and less environmentally spatial policy approach.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
A third option would seem to be implied but is not spelt out. Option 1 appears to be a general policy approach; option 2 appears to be a spatial approach at the Highland level; so option 3 would then be a spatial approach at the more local level. Might the differing likely environmental effects have been clearer if three rather than two options had been articulated? At the end it says “the benefit of the preferred approach will be in providing detailed mitigation of effects that would not be achieved through an overview general policy approach” – but it would appear that the preferred option is a general policy approach and it would be expected that the alternative would assess better for SEA because it would provide environmental considerations at the more detailed level.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Forestry and Woodland (pp1006 – 1032) 2 – it is disappointing that green network maintenance and enhancement for people and wildlife is scored as neutral. Forestry and woodland plays a key role in existing and potential future green networks. The proposed interim revision of the Highland Forest and Woodland Strategy to focus on areas of policy change should include the strengthened policy towards	Noted. All assessments will be revised for the RER. This comment will be taken on board.

green networks (e.g. see NPF2). Therefore we would have hoped to see green networks assessed as positive here.	
3 – if the proposed review is going to allow chance to maximise opportunities relating to community woodland, then it would have been expected this objective relating to opportunities for people to come into contact with and appreciate nature/natural environments be scored as positive rather than neutral. It should be noted that woodland developments that have associated structures, e.g. fences, tracks, drainage channels, mounding/ploughing, or non native species may have negative effects on the experience of wildness qualities.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16 - a key issue is associated development. The impacts on landscape character often relate to scale. There may be change to a local area of landscape character or a key characteristic, the woodland acting as a feature; however, alternatively, woodland development may have an overwhelming impact on the underlying landscape characteristics, e.g. changing from an open moorland, or screening distinctive landform characteristics, resulting in an overall loss of the existing character type and the creation of a new landscape character type, as per some woodland landscape character types within existing LCAs.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
17 - the addition of trees/ woodland will screen some views which may affect scenic value.	Noted.
Minerals (pp1033 – 1059) 1 – the positive score for biodiversity assumes this will be built into the general policies for mineral extraction. However the policy would then have to place more weight on maintenance and enhancement of biodiversity than on other factors (e.g. need for the mineral) in order for such a positive impact on biodiversity consistently to be delivered.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
2 – the positive score for green networks may be looking more to when a quarry is restored than when it is being worked. So a +/- score may be more appropriate.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
3 – a positive score has been given to opportunities for people to come into contact with and appreciate nature/natural environments. Again this may be looking forward to when a quarry is restored perhaps to a natural afteruse. But while working it is likely that the opportunity will be restricted. So a +/- scoring seems more fitting.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
4 – human health – again too much weight is arguably being placed on possible restoration of a quarry to a natural afteruse in giving this a positive score. While in operation a quarry may have a negative effect on human health, say through noise and dust. So at the best a +/- score seems more fitting.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
5 and 6 – it does seem optimistic to assume that all quarries will be restored as public open space and will include outdoor access opportunities and so deserving of positive scores here. More appropriate would seem to be neutral scores, accepting that on occasion a quarry may	Noted. All assessments will be revised for the RER. This comment will be taken on board.

be able to be positively restored for such afteruse.	
7 – the negative effect here on geodiversity and soils could be mitigated through good restoration and aftercare practices and also with regard to geodiversity through possible leaving of exposure of sub-strata.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
11 – air quality – it is questionable whether ‘this topic is of low relevance’ and so scored neutral. Air quality around quarries can be adversely affected by dust, and so mitigation can be stipulated.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
12 – re contributing to reducing vulnerability to effects of climate change, more to the point might be rock armouring that rock quarries provide for coastal defence works.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
16/17 – the possible negative effects on landscape in the short/medium term with hoped-for restoration in the long term can be more effectively indicated here by scoring negative in the short and medium term but scoring neutral in the long term	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Alternative (spatial locational policy approach for new quarries) 1/2/3/16/17 – it may be more complete to indicate that these negative effects could be mitigated to a degree if the criteria for the spatial approach for preferred or search areas were rigorous enough	Noted. All assessments will be revised for the RER. This comment will be taken on board.
4/5/6/7/11/12 – see comments above	Noted.
Open Space (pp1060 – 1084) No further comments – a comprehensive section of the SEA	Noted.
Access (pp1085 – 1103) No further comments – a comprehensive section of the SEA	Noted.
Green Networks (pp1104 – 1116) It is slightly unclear why there is a separate section in the SEA for green networks when they form part of the preferred option for open space and physical activity. However this does allow the wider attributes of green networks to be considered, especially with regard to biodiversity.	Noted. We have a separate SEA as at the time we were considering a separate policy approach to Green Networks. In the proposed plan there will be a separate policy on the matter.
12 – (reduce vulnerability to effects of climate change) – this is noted as of low relevance for green networks. However a function of green networks at the larger scale can be to allow species to migrate to respond to climate change. So in the longer term and at the regional scale it would be desirable to see this scored as positive, with green networks identified and recognised in LDPs accordingly.	Noted. All assessments will be revised for the RER. This comment will be taken on board.
Water and Waste Water Infrastructure (pp1117 – 1132) No comments	Noted.
Design Quality (pp1133 – 1149) 1 – re biodiversity this is scored as neutral because of ‘low relevance’ – however this overlooks the potential of design quality to protect and enhance the habitat of protected	Noted. All assessments will be revised for the RER. This comment will be taken on board.

species in buildings, e.g. bats, barn owls	
17 – re landscape character, scenic views and the special qualities of designated areas it is unclear again why it is stated that design quality is of low relevance for this topic. On the contrary, good design can have a positive effect on landscape in a general sense.	Noted. All assessments will be revised for the RER. This comment will be taken on board.

Mr and Mrs Stafford

Comment	Response
<p>a) It is our understanding that environmental assessments are intended to provide for a high level of protection of the environment. The Practical Guide to the SEA Directive (crown copyright Sept 2005) advises: <i>“Consultation with the public at earlier stages (e.g. when considering the scope of the Environmental Report) can provide useful information and public and stakeholder opinions on issues relevant to the plan or programme and the SEA. This can also help to avoid issues arising later which might delay the preparation of the plan or programme. Some consultees will want to become active participants, while others may only wish to be kept informed, or to be involved through participatory events or written consultation. Much depends on the measures used to encourage their interest and involvement. It is important to be aware that consultees are not a homogenous group and to allow them to indicate how they wish to be involved. Lists of consultees will typically expand and change as the SEA progresses and issues emerge or cease to be relevant.”</i></p>	<p>Noted.</p>
<p>As far as we are aware the public have not been involved in any scoping exercises and they will also have very little knowledge of the environmental assessment process. We feel that this has been a lost opportunity. Early involvement could have facilitated a better consultation response to the issues presented in the report, particularly given the range of documentation that requires scrutiny.</p>	<p>We thank you for your suggestion we will take it into consideration for future SEA work for larger scale plans and locally specific briefs where their may be a strong community interest.</p>
<p>b) We understand that there are limited provisions for ensuring the quality of environmental reports and that the report itself is only obliged to look at reasonable alternatives. Given that in many cases there are no alternatives given for proposed developments in the Main Issues Report and therefore no alternatives considered in the Environmental Report we question the validity of the Environmental Report in this respect.</p>	<p>The SEA is only required to look at reasonable alternatives and as such at the MIR stage none had been identified to those included in the MIR. In the process of further work reasonable alternatives have been brought forward and will be assessed as part of the preparation of the revised environmental report.</p>
<p>c) Likewise it is unclear how far the SEA process will collect new primary data on environmental issues or rely solely on existing data sets which may be flawed. We have insufficient time to consider this point.</p>	<p>The Environmental Report has sought to utilise numerous data sources to enable a balanced assessment of the environmental affect of the Local Development Plan. The majority of these are provided by organisations such as SNH, SEPA and Historic Scotland. We use the most up to date information and resources available when compiling an SEA.</p>

<p>d) We understand that the Directive does not prescribe who is to carry out an SEA, but normally it is the task of the Responsible Authority, i.e. the body which prepares and/or adopts the plan or programme and that many benefits of SEA may be lost if it is carried out as a completely separate work-stream or by a separate body. But apparently it is also helpful to involve people, either within the Responsible Authority or outside, who are not directly concerned in producing the plan or programme and can contribute expertise or a detached and independent view.</p>	<p>Noted. Through out the preparation of the Environmental Report we worked with the consultation authorities and other specialists within the Council on specific issues to ensure further expertise was utilised where necessary.</p>
<p>We have read that many local and regional planning bodies commission consultants to prepare an SEA, largely because they do not feel that they have either time or the expertise to deliver what is a complex document. It should be explained to elected members why, when Highland has already chosen to commission consultants to bring forward other master plans, did the Planning Authority choose not to use consultants to prepare the environmental assessment. Was any special training or support provided for the Planning Department?</p>	<p>The Council chose not to use consultants to carry out the SEA as a body of expertise has been built up in house which would provide better value. Also as the SEA process should go hand in hand with the preparation of a plan, programme or strategy we believe it would be better to carry out the SEA in house to ensure the SEA process has appropriate influence over the plan making process.</p>
<p>e) The Environmental Assessment had a total of 6 appendices which contained much of the detail. The methodology could have been better explained as could some of the technical terms.</p>	<p>Noted. In the revised environmental report we will aim to make the assessment methodology clearer and avoid the use of technical terms where possible.</p>
<p>f) We cannot understand why, if the Environmental Report states that Highland Local Development Plan will not deal with specific sites outwith the A96 Corridor, Nigg and Dounreay, Appendix 4 is able to include a Summary 'Spatial Strategy as a whole' which cites, "<i>sustainable growth of Highland spread throughout the area</i>". If the SEA objectives have been considered in detail for sites in the Corridor then why was it possible not to include a full analysis across Highland to validate this claim?</p>	<p>We will ensure this is more fully covered in the RER, where the proposed plan will be clearer on spatial strategies for other areas of Highland to enable the spread of growth throughout the area.</p>
<p>g) With respect to the Inverness City Vision: 'Full Assessment Matrices' are included for the Inverness City Vision and alternatives, but <i>no</i> City Vision document has been made available for consultation. In fact the Assessment Report states, "<i>As part of our assessment we looked at different alternatives to many of the parts of our spatial strategy and our policy approaches. These were looked at as part of our Main Issues Report as well and members of the public will have an opportunity to tell us what they think of both our preferred options and the alternatives as part of the consultation on that document.</i>"</p>	<p>Noted.</p>
<p>We do not agree with the detriments proposed as resulting from non-inclusion of the City Vision into the HwLDP. The HwLDP or the Inner Moray Firth Plan could identify the</p>	<p>Noted. We intend to include a policy on the Inverness city vision in the Highland wide Local</p>

<p>importance of walking and cycling networks, highlight sustainable transport objectives and protect the built environment etc.</p>	<p>Development Plan and this will be assessed as appropriate. The City Vision has been subject to a separate SEA process and it has been determined that an SEA will not be required.</p>
<p>There is a contradiction in stating that if the City Vision was not incorporated then development and investment would be concentrated to the Greenfield sites and would result in the continued decline of brownfield sites. The 2003 City Vision was used to justify large areas of Greenfield land use, and much of the A96 Corridor development – which features prominently in the City Vision - is on Greenfield sites.</p>	<p>Noted. It was not the intention of the ER to assess the affects of the 2003 city vision but the one which was in preparation at the time. This is yet to be finalised but it is likely to have a greater focus on the city which recognising its opportunities to expand.</p>
<p>h) In terms of rating impacts, surely it should be either a 'Minor negative impact' or a 'Minor positive impact' with the word 'No' associated with the term 'Neutral'. Thus instead of '<i>No or minimal negative impact</i>' and a '<i>Neutral Impact</i>' it should be, 'Minimal negative impact' and 'No or neutral impact'. This would then be consistent with the approach taken by the Scottish Government SEA assessment used for the "<i>Assessment of the Environmental Effects of Candidate National Developments</i>" (which also considered the effects of the A96 Corridor Developments).</p>	<p>Noted. The terminology has been agreed with the consultation authorities however, for future SEA work we will seek to make this clearer taking on board this comment.</p>
<p>i) Where it is possible, we have compared the assessment matrix for the A96 Corridor as presented in the MIR Environmental Report with the assessment findings for the A96 Corridor included as part of the NPF Team's work (Assessment of the Environmental Effects of Candidate National Developments) and we are concerned that the Planning Authority has underestimated the negative impacts in the cases of "<i>Protects or enhances biodiversity, flora or fauna</i>", "<i>Reduces water pollution or enhances water quality</i>", "<i>Reduces energy consumption and CO2 emissions</i>" and "<i>Safeguards...built environment</i>". The relevant sections of the NPF Team report are included as Appendix 1. It should be noted that the NPF Team based their assessment on the A96 GCDF and its associated SEA.</p>	<p>Noted. Given the environmental data and SEA objectives differ between that carried out for NPF 2 and the Highland wide Local Development Plan we understand there may be differences between the two assessments. The assessments for the Highland wide Local Development Plan will continue to use the most up to date information available to assess proposals within the plan.</p>
<p>Since no detail of the GIS work with SNH is included we cannot assess its role in relation habitat linkages.</p>	<p>Noted. This will be subject to a separate SEA process for the Green Networks: Supplementary Guidance.</p>
<p>j) We are concerned about the choice of the 17 SEA objectives. Whilst we understand from the Environmental Assessment that, "<i>A number of SEA objectives were identified at the Scoping stage and following comment from the consultation authorities these have been refined</i>", some of them appear to be very 'similar' in character. The NPF team managed with just 10 SEA objectives.</p>	<p>Noted. The development of the SEA objectives have been developed with the Consultation Authorities and the considerations for each objective will be re-ordered for the RER to ensure that further clarity can be sought on the differenced between the SEA objectives.</p>
<p>k) We are concerned about the number of different Environmental documents which have</p>	<p>Noted. The Highland wide Local Development Plan</p>

been prepared with respect to the A96 Corridor Plans.	SEA is the most relevant and up to date environmental document prepared for the area. Further environmental reports may be necessary to assess specific issues.
I) We are concerned that the consultants who oversaw the preparation of the original A96 Masterplan did not carry out SEAs on the 8 options under consideration at the same time as the sustainability appraisal.	Noted. This was a separate SEA process and the Highland wide Local Development Plan SEA now offers a more up to date context for development in this area.
We have read that only rarely will a plan lead to decisions that improve all aspects of sustainability - social, economic and environmental. However we also understand that decision makers are not meant to 'trade off' the environment with economic growth, instead they are meant 'integrate' the objectives of sustainable development in a way which ensures the environment is robust enough to support future generations. (This view is specifically identified in the Sustainable Development strategy 2005 - DEFRA website).	Noted. Through the Highland wide Local Development Plan we have sought to deliver growth while also balancing this with the needs of the environment. We hope to have achieved this through the SEA process.
We are extremely concerned that the Environmental Assessment underplays the impacts and we are once again time limited and unable to finish this response.	Noted.

Comments received at Revised Environmental Report (Proposed Plan Stage)

Historic Scotland

Comment	Planning Authority Response
<p>Thank you for consulting Historic Scotland on the revised Environmental Report for the Highland Wide Local Development Plan which was received in the Scottish Government's SEA Gateway on 24 September 2010. As you will be aware, we responded to the original Environmental Report on 6 November 2010 and we welcome that our comments at that stage have been taken on board in the revised Environmental Report. This response should be read in conjunction with the comments offered at that time. I have the following comments to add to those previously issued. I have the following comments to add to those previously issued.</p>	<p>Noted</p>
<p>General I welcome the significant amount of work undertaken by The Highland Council in the assessment of this Local Development Plan and I am content that the Environmental Report represents a robust assessment of the contents of the plan. However, I would raise the following two issues to bear in mind for subsequent assessments.</p>	<p>Noted</p>
<p>Policy Assessments In the methodology for the assessment of the Vision/Spatial Strategy and Policy I note that a criterion has been included that relates to the "sensitivity of the SEA Objective to the policy". I would urge caution in this as a system such as this may lead to the ranking in importance of policies, rather than an equal weighting of policy against policy.</p>	<p>Noted. This approach has now been taken forward for the future SEA work following comment from Historic Scotland. The reason for using this approach was to identify how relevant the SEA objective was to the policy/vision/strategy that was being assessed.</p>

<p>Site Assessments</p> <p>Overall I am content to agree with the assessments offered for the sites brought forward in the plan. However, the reporting of these assessment findings does lack some clarity in differentiating between the effect before mitigation and the residual effect. While it is clear from the commentary provided that the assessment has been well thought through the ER would have benefited from the expansion of the tables to indicate where a potential negative effect would be mitigated by the appropriate application of policy to a neutral one. Although I am content that the sites can be mitigated the approach described above can lead to problems when any site cannot be satisfactorily mitigated.</p>	<p>Noted. In future SEA work we will ensure that the potential negative affect prior to mitigation and the potential affect post mitigation is made clear.</p>
<p>In terms of the assessment findings, the developer requirements are particularly welcomed in the way they focus on those particular aspect of the historic environment that will require mitigation in the delivery of development. It would be beneficial if these requirements be made explicit in the plan itself. Once way of achieving this would be to detail key mitigation measures within the action programme.</p>	<p>Noted. In most situations these have been taken forward in the plan making process, however if a site is already allocated in a separate local plan or if the site benefits from an extant planning consent then we have not included this in the plan. We may bring this mitigation forward through the action programme for the Highland wide Local Development Plan.</p>

SEPA

Comment	Planning Authority Response
Thank you for your Revised Environmental Report consultation submitted under the above Act in respect of the above Plan. This was received by SEPA via the Scottish Government SEA Gateway on 24 September 2010	Noted
We have used our interim Environmental Report response of last year to consider the adequacy of the Revised Environmental Report and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the Environmental Report. Please note, this response is in regard only to the adequacy and accuracy of the Environmental Report and our comments on the Plan itself will be provided separately.	Noted
As the Plan is finalised, The Highland Council as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13 . A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.	Noted
Should you wish to discuss this consultation, please do not hesitate to contact me on 01349 860359 or via our SEA Gateway at sea.gateway@sepa.org.uk .	Noted
<p><u>General comments</u> We consider that generally the ER provides a comprehensive assessment of the Plan and for this you are to be commended.</p>	Noted.
We are pleased to note that many of the comments we made on the last ER have been taken into consideration in the drafting of this revision. This is very much welcomed, but with a view to reducing the length of this response, it is not commented upon in detail below. Instead our limited detailed comments concentrate on the assessments themselves and the proposed mitigation. The main issue of concern is that much of the mitigation outlined in the ER has not been included in the proposed Plan. As a result we request that you ensure that all mitigation proposed is	Noted. In most situations the mitigation have been taken forward in the plan making process, however if a site is already allocated in a separate local plan or if the site benefits from an extant planning consent then we have not included this in the plan. We may bring this mitigation forward through the action programme for the Highland wide Local Development Plan.

included in the finalised Plan.	
Assessments of environmental effects - general comments You have, again, gone to significant effort to assess all aspects of the Plan in some detail and for this you are to be commended.	Noted.
We very much welcome the improved interpretation of assessment results which is now provided within the main body of the text. The inclusion of this information has resulted in us having far fewer queries than at the interim ER stage.	Noted.
Assessment of policies We welcome the clear outlining of both the assumptions made during the assessments and the justifications provided for the assessments. We are generally satisfied with the assessments presented agreeing that a number, such as policy 36 and 37, could have negative effects on our areas of interest; other policies in the Plan will help as mitigation.	Noted.
Assessment of sites The ER identifies a wide range of very good mitigation measures for impacts on the water environment from many of the allocations, but they are not included in the Plan for those development allocations outlined in Policy 1, 3, 4, 5, 6, 7, 8, 9, 14, 15, 16, 24, 25, 26 and 27. For example, the ER identifies that the allocation at Ness-side (policy 8) is at high risk of flooding and outlines that any future developments within this indicative flood risk area will require a flood risk assessment, yet the Plan does not make this clear. Similarly the ER identifies for Ashton Farm (policy 9) that the development will have a physical effect on the water environment and as mitigation it states that "the developer requirements for the allocation will specifically require that no further culverting of watercourse takes place" yet the Plan does not include this mitigation. We request that you re-examine all the mitigation measures outlined in the ER and ensure that they are delivered in the Plan. Where they are not we would consider that it is likely that there are still significant negative effects arising from the proposals.	Noted. In most situations the mitigation have been taken forward in the plan making process, however if a site is already allocated in a separate local plan or if the site benefits from an extant planning consent then we have not included this in the plan. We may bring this mitigation forward through the action programme for the Highland wide Local Development Plan. In terms of the sites which are identified for phase 2 or beyond (2016 onwards) the appropriate area local development plan will bring forward further detail on the allocation and the mitigation suggested through this Environmental Report and any additional mitigation identified by the Strategic Environmental Assessment for the Area Local Development Plan.
In relation to Policy 13, Tornagrain, we note that although the ER identifies that this allocation can connect to the public sewer, private foul drainage is supported for phases 1 and 2. We consider that such an approach may jeopardise the delivery of strategic drainage infrastructure for the whole A96 corridor and as such should be scored as significantly negative.	Noted. We have taken this forward to examination on the Highland wide Local Development Plan as an outstanding issue

<p>In relation to Policy 24, Nigg, we note that there are a number of SEA questions which have not been answered for this allocation, including whether development will have a physical impact on existing watercourses.</p>	<p>Noted. This will be addressed in the Finalised Environmental Report.</p>
<p>Assessment of cumulative and synergistic effects We welcome the fact that you have tried to assess cumulative and synergistic effects. We do, however, have some reservation regarding the methodology applied. This is because one effect does not off-set another effect.</p>	<p>Noted.</p>
<p>For example, we note that it has been determined that the assessment of the spatial strategy (policies 1 to 28) will have a positive cumulative effect against SEA Objective 7 on soil, yet 15 of the 28 sites are scored as having a negative effect. We would suggest that generally allocation of significant areas of land for development will have a negative effect against this soil quality SEA Objective and that cumulatively the Plan does not have positive effects in relation to soil.</p>	<p>Noted. This will be addressed through the post-adoption statement.</p>
<p>Monitoring We note that it has been decided to slightly reduce the scope of the proposed monitoring. We have no concerns regarding this. Generally we would suggest you ensure that you focus on those aspects of the environment where you consider there are likely to be significant effects, and any areas of baseline where you consider there is no or little information.</p>	<p>Noted. By reducing the monitoring framework it is considered the Council are now concentrating on areas where there may be significant affects and are also monitoring areas.</p>

SNH

Comment	Planning Authority Response
Some general comments are provided below, while more detailed comments – working through the RER and appendices – are provided in the Annex.	Noted
The Habitats Regulations Appraisal of the plan will need to consider the effects of the plan’s visions, allocations and policies on European sites. This SEA could have picked up more (albeit in a more general way than the HRA) where there are likely significant effects on European sites, including cumulatively.	Noted. Unfortunately the HRA and SEA process were not carried out in tandem for this plan. It is the intention to have closer integration between the two assessments in future Local Development Plan work.
The sections on cumulative effects are commendable, but we believe the systematic approach of multiple scores in a matrix is obscuring a more intuitive consideration of the likely cumulative effect of large scale developments in a particular area. For example with regard to the A96 corridor/Inner Moray Firth developments, cumulative impacts do seem intuitively likely on protected species (especially badgers) and landscape character, while we have advised that a cumulative assessment on European sites is required as part of the Habitats Regulations Appraisal for the plan. Taking protected species as an example, although each development site may have provision for a survey and mitigation plan, if mitigate on plans depended on adjacent land being free from development which in fact wasn’t going to be the case, then a negative cumulative effect will result, despite individual neutral effects. The methodology for cumulative assessment should therefore be reviewed.	Noted. We are learning from this experience and will take forward a more holistic approach for future local development plan work.
We found the assessments of site allocations across both Appendix 4 and Appendix 5 confusing and lengthy. The ‘key considerations’ in Appendix 4 differ from the ‘issue checklist questions’ in Appendix 5. While the former seem quite comprehensive now (following comments on the ER for the MIR), there are gaps in the latter. For example there re no ‘issue checklist questions’ to pick up SEA Objectives 2 (green networks), 3 (understanding and enjoyment), 6 (access) and 7 (soils re greenfield land). We consider that one appendix only, with one set of ‘issues/considerations’ to expand upon the SEA Objectives, would be much easier to understand and of course would shorten the document. 4. We wonder whether all possible opportunities have been taken to maximise the number of positive scores and minimise the number of negative scores (or improve neutral scores) in	Noted. Throughout the process we have taken on board comments from the consultation authorities in relation to the layout and assessment methodology of the plan. In doing so we believed that we had addressed many of these concerns at an earlier stage in the SEA process if they were raised. The two appendices of assessments, appendix 4 dealt solely with the policies, spatial strategy and visions and appendix 5 dealt with site allocations only. The planning authority felt that this methodology would make it clearer and easier to understand the assessments as each has separate considerations under the same SEA objectives. In terms of identifying residual effects then this is something we will take forward in future work on Strategic Environmental Assessment.

<p>the vision, spatial strategy and policies of the plan. For example, only the vision for the Inner Moray Firth makes specific references to the plan's role in responding to climate change and to green networks. And some policies (e.g. Policy 37) are identified as having some negative effects, but no additional mitigation is identified. This points to the usefulness of an additional section on any residual negative effects, which can lead into the monitoring section, i.e. monitoring provisions especially put in place for the identified residual negative effects of the plan.</p>	
<p>Non Technical Summary A non technical summary must be added.</p>	<p>Noted. A non-technical summary was present in the document however the title was missing. A title will be added to ensure confusion is avoided.</p>
<p>Relationship with other PPS (pp 9-17) Document 31 – please note the EC Birds Directive has been repealed and replaced by the European Birds Directive (2009) Document 87 – the date of the Nature Conservation (Scotland) Act should be added (2004) Document 110 – please note this EPS interim guidance was published by the Scottish Government (Executive), not SNH Document 288 – typo – the date should be 1999 The National Renewables Infrastructure Plan should be added under Scotland (National). Circulars – Circular 6/1995 (Revised 2000) Habitats and Birds Directives is not listed and should be added – see – http://www.scotland.gov.uk/library3/nature/habd-00.asp Add also Circular 9/1987 Development Control in National Scenic Areas Regional – Core Path Plans should be added.</p>	<p>Noted. We have previously made significant modifications to this section based on comments from the consultation authorities. However we will make the modifications requested as part of the finalised Environmental Report which will accompany the HwLDP.</p>
<p>Relevant aspects of the current state of the environment (pp 18-19) Reference to SPAs needs to be added under international designations, rather than after NSAs. There are two references to NSAs, one saying there are 16 in Highland, the other saying there are 14. This should be corrected – in fact excluding the Cairngorms NSA there are 15 NSAs in the HwLDP area. Some discussion of wild land is needed – its extent in Highland, but that it is a diminishing resource. Of possible help pending national mapping work is a national indicator based on the visual influence of built development – see – http://www.snh.gov.uk/publications-data-and-</p>	<p>This section has been modified to improve clarity and be more comprehensive.</p>

research/trends/scotlands-indicators/naturalheritage-indicators/	
Some more emphasis could be placed on the environmental characteristics likely to be significantly affected in the Inner Moray Firth and A96 corridor areas – with specific reference to the Moray Firth SAC, Inner Moray Firth SPA and Ramsar, protected species (including badgers), landscape character and land capability.	
Reference to ‘whiskey’ should be amended to ‘whisky’	
Environmental problems (pp 20-21) Biodiversity, flora and fauna – indirect impact of development on designated sites should be referred to here.	Noted. This will be revised as part of the Finalised Environmental Report.
Soil – typo – this should read ‘inappropriate scales of development’.	Noted.
Landscape – a ‘problem’ not included here is cumulative impacts, especially of wind farms. The supplementary guidance for onshore wind farms should be addressing this.	Noted. This will be revised as part of the Finalised Environmental Report. However, as mentioned this will also be dealt with by the SEA process for the On-shore wind energy supplementary guidance.
It is stated that there are “conflicts between designated areas and economic development”. This statement seems inconsistent with the other environmental aspects, for which the same observation could be made and is not; generally we believe that the objectives of designated areas can usually be met while facilitating economic development, it is usually a case of sensitive siting and design.	Noted.
SEA Objectives (p23) We welcome the additional objective re safeguarding wild areas.	Noted.
Alternatives (pp 25-30) This is a useful section, setting out if any alternative to elements of the plan were identified.	Noted.
There should be a cross-reference here to Appendix 4, which assesses any alternatives and which gives a reason for why the alternative was not selected. It would have been helpful if the table here included for all those policies etc where there is an alternative why it was rejected, e.g. Policies 19 (although this may be covered by 20-22), 30, 36, 37, 45, 54, 59, 60, 61, 69. (NB: we agree that Policies 59-61 are needed in order to provide the necessary level of detail for species with special protection, and then for other important habitats and species in view of the Biodiversity Duty. And Policies 75-79 – we agree with the preferred option over the stated alternative).	Noted.
Policy 12 (Stratton) – this needs shading to indicate there is an alternative.	Noted, this typographical error will be corrected.

Policy 39 (New Settlements) – it says here that there is no alternative to this policy, but the clear alternative is set out in Appendix 3, so there should be a ‘Y’ rather than a ‘N’ here (however the text then explains the reason for selecting the preferred option).	Noted, this typographical error will be corrected.
Policy 42 (Business and Industrial Land) – although this says there is no alternative, there would seem to be a clear alternative here based on this text – a less flexible policy towards business and industrial proposals outwith identified sites. The text implies consideration has been given to a more or less flexible policy approach for business and industrial land.	Noted, this typographical error will be corrected.
Policy 48 (Crofting) – this could explore the basic alternatives of development on in-bye or on common grazings land.	Noted.
Policy 49 (Crofting) – consideration of the alternatives should separate out those of (a) not having such a policy, but leaving the matter to Area LDPs, and (b) limiting such a policy to the ‘wider countryside’ beyond the Hinterland of Towns. The reasons for selecting the preferred option can then be more clearly set out.	Noted.
Policy 68 (Renewable Energy) – an alternative would have been to have had separate policies for different renewable energy technologies, e.g. wind, hydroelectric, biomass – this may have provided more clarity and precision, although there would have been some duplication of issues.	Noted. As intimated in this response by having a separate policy for each type of renewable energy development may lead to repetition. In addition if a new technology which is not covered by a policy in the plan would not be able to be assessed.
Assessment (pp 31-49) General point – we wonder if when a potentially negative environmental effect is offset by a component criterion of the policy, the overall effect should then be scored as neutral rather than positive?	Noted.
It would be helpful if policies were named in full as well as numbered.	Noted.
Policy 5 (former Longman landfill) – there is a misprint in that this policy relates to the former Longman landfill site rather than the Longman core area of the City. Positive effects for some SEA Objectives may be reduced by Policy 72 which safeguards this site for waste management. It would be helpful if the text considered the proximity to SAC, SPA and Ramsar sites (Objective 1) and its coastal location re sea level rising (Objective 12).	Noted. The proximity to the SAC , SPA and RAMSAR site will be considered in detail by the HRA of the plan.
Policies 9-23 (A96 Corridor) – for these site allocations for the A96 corridor, the general point above applies. Thus it is difficult to follow how the development of these sites will be positive for green networks as opposed to neutral. The green network exists at these sites at present the relevant policy criterion seeks to protect them (with new provision where existing	Noted. The rational behind this is set out in the report however it would have been clearer if inclusion of a column showing affects before and after mitigation was included.

provision is lost) – therefore the effect of the policy on the environment should be neutral – unless the green network is somehow enhanced beyond what presently exists by off-site positive habitat management. Clarification is needed that these sites are already parts of the macro green network in terms of habitat, with micro examples within e.g. hedgerows, tree belts, field margins.	
Policies 9-23 – these should note possible effects on nearby European sites as discussed in terms of the Habitats Regulations Appraisal (Objective 1). This is particularly relevant for Policies 5 (as above), 6, 9, 12 (Stratton), 13 (Tornagrain), 14, 15, 16, 17, 20, 23, 24 and 25.	Noted. The proximity to the SAC , SPA and RAMSAR site will be considered in detail by the HRA of the plan.
Policy 14 (Whiteness) - some discussion would have been helpful re Objective 12 (coastal location).	Noted.
Policy 37 (Housing in the Countryside) - this does not read as though it was possible to incorporate full mitigation into the policy, and so residual negative effects may remain. It is unclear if consideration was given to inclusion of any further criteria in the policy to reduce negative effects. Residual negative effects could usefully be listed later in the RER and considered further under Monitoring.	Noted. It may have been clearer if inclusion of a column showing affects before and after mitigation was included. In future SEA work we will use this approach.
Policy 44 (Tourism) – increasing tourism could lead to increasing pressure on the natural environment. One example might be increasing pressure on the Moray Firth SAC and the dolphin population as more people take part in water based recreation within the firth or seek out boat tours. This impact should be recognised so that mitigation can be put in place (e.g. support for the Dolphin Space Programme).	Noted. The effect of this policy on SAC, SPA and RAMSAR sites will be covered in detail in the HRA of the plan.
Policy 48 (Crofting) - discussion can be added here re if development takes place on common grazings instead of inbye, would this have negative effects on Objectives 1, 16 and 17?	Noted.
Policy 53 (Development in Woodland) - in allowing for development in woodland, it is difficult to see how this can be scored positive for many Objectives e.g. biodiversity, green networks, landscape – the more likely scenario is neutral outcomes through mitigation and exemptions.	Noted.
Policy 54 (Minerals) – geodiversity should be considered under SEA Objective 7 rather than SEA Objective 1, in which case it is likely that effects on biodiversity, flora and fauna would be neutral rather than positive.	Noted. It is considered that this has been covered by both SEA objectives.
Policy 57 (Travel) – typo – should read Modal Shift.	Noted.

<p>Policies 68, 69, 70 (Renewable Energy) – other examples of where the scoring might alternatively be judged to be neutral, in that any possible negative effects are counteracted by the safeguards in the policy, so that the overall effect of such developments on such issues as landscape, biodiversity, access are neutral - see general comment.</p>	<p>Noted. It may have been clearer if inclusion of a column showing affects before and after mitigation was included. In future SEA work we will use this approach.</p>
<p>Assessment of Cumulative Effects – Vision (pp 51-54) It could be argued that a vision should aspire to be positive across the range of SEA Objectives rather than settling in some cases for neutral. Does this suggest a ‘missed opportunity’ as regards the use of SEA? Although Objective 12 (climate change) is scored as positive for all three Highland Areas, only the vision for the Inner Moray Firth actually makes express references to climate change.</p>	<p>Noted.</p>
<p>Assessment of Cumulative Effects - Spatial Strategy (Policies 1-28) (pp 55-59) Consideration could have been given to sub-dividing the cumulative assessment between Policies 1-24 which are in the Inner Moray Firth area and Policies 25-28 which are in Caithness. These are the logical areas where any cumulative effects may be felt. Thus for the safeguarding of soil quality and quantity there are significant differences between these sub-divided areas (and areas within them).</p>	<p>Noted. The approach we used sought to consider the Highland Council area as a whole as it was considered that if it was split into areas there may have been some issues with cross-boundary cumulative affects, including potential affects of mixed use development right across the area rather than Inner Moray Firth and then Caithness and Sutherland.</p>
<p>Re SEA Objective 1, this is more than just about designated sites, and includes biodiversity, protected species and valuable habitats. The cumulative scenario is not perhaps being picked up where protected species will be unable to move from one site to another, because cumulatively both sites affect the same species. Some more intuitive consideration is needed on likely cumulative effect on protected species and habitats for all the development proposed from Inverness to Nairn, although the policy re green networks could assist with this.</p>	<p>Noted.</p>
<p>As discussed elsewhere in terms of Habitats Regulations Appraisal, for a large expansive designated area such as the Inner Moray Firth SPA/Ramsar with several allocations of proposed development in the general area, it is not clear how the methodology here is considering the cumulative impact of a number of ‘non-significant’ effects and checking if cumulatively they remain non-significant or whether cumulatively they become significant.</p>	<p>Noted. This will be picked up in more detail by the HRA of the plan.</p>
<p>With regard to the Moray Firth SAC (e.g. policies re Nigg and Whiteness)</p>	<p>Noted. Again this will be picked up in more detail by the HRA of the</p>

you will be aware of the Dolphins and Development – Data Analysis and Spatial Model contract (final report expected July 2011). The ER should refer to this, since this work should provide a good basis for making decisions in relation to future development re the Moray Firth SAC.	plan.
Again re Objectives 16 and 17 re the local distinctiveness of the landscape and re landscape character, intuitively there is a need to consider more deeply that no matter the mitigation at the detailed scale of proposals, e.g. landscaping planting, there will be a cumulative effect on the area to the east of Inverness and then around the western margins of Nairn.	Noted.
Assessment of Cumulative Effects - General Policies (Policies 29-79) (pp 60-64) Again, these policies are very disparate, and the Proposed Plan does make clear that any proposal must be considered against all policies, rather than just the 'obvious' one. Therefore it is an in-built aspect of the plan that if one policy say does not refer to landscape, nevertheless the landscape policy must be read alongside it.	Noted. At the front of the Proposed Plan in the How to Read the plan section, it is considered that it is very clear that the plan must be read as a whole. If this was not in the plan then it would be fair to include a cross-reference to each policy, however this is included so it is not considered reasonable to take this approach.
Therefore it may have been a useful amended exercise here to concentrate on the 'development' policies (Policies 33 to 57 and 68 to 72) to consider whether any stronger cross-referencing with more 'protective' policies (58-67 and 73-79) would have been justified in order that any significant negative effects may be avoided.	Noted. However, see comments above.
Measures envisaged for the prevention, reduction and offsetting of significant adverse effects (pp 65-67) The principle of this section is good, although it is not comprehensive. Some minor comments –	Noted.
Policy 37 (Housing in the Countryside) - should more criteria bullet points be added to this policy to pick up mitigation needs, or add reference to all general policies?	Noted. The plan should be read as a whole.
Policy 45 (Tourist Accommodation) – landscape character mentioned; what about other SEA issues?	Noted. The plan should be read as a whole.
Policy 70 (Electricity Transmission Infrastructure) – it is unclear how the SEA has differentiated between where criteria should be added as bullet points to a policy and where as here 'requires adequate mitigation to be provided; this will vary on a case by case basis'.	Noted. This has been clarified in the Finalised Environmental Report.
Why does Policy 68 on the one hand contain a large number of bullet point criteria whereas this policy on the other hand has none?	This is a matter for formatting of the plan.

<p>Assessment of Compatibility between Policy Approaches (pp 68-69) Although this is not part of the standard SEA approach, this is a useful double-check.</p>	Noted.
<p>In respect of the Longman landfill site (Policy 5), is not Policy 72 partly incompatible with this policy, given that Policy 72 preserves the site for waste management use, while Policy 5 includes the possibility of a community/open space use?</p>	<p>It is not considered that there is an incompatibility. The Plan's waste management policies safeguard former landfill sites as areas of search for new waste management facilities. However, they don't reserve the whole of the Longman site exclusively for waste management purposes. Indeed Policy 72 includes the wording, "except ... where they have been allocated in the development plan for redevelopment." The Longman allocation encloses 117 hectares providing adequate space within which to separate less compatible uses.</p>
<p>The Habitats Regulations Appraisal needs to consider the possible impact of allocations on designated European sites. In the meantime, this compatibility matrix does not appear to be picking up those policies that need to be the subject of HRA, e.g. Policy 5 (Longman Landfill) v. Policy 58 (Inner Moray Firth SPA), Policy 23 (Cawdor) v. Policy 58 (Cawdor Wood SAC), Policy 14 (Whiteness) v. Policy 58 (Moray Firth SAC and Inner Moray Firth SPA), Policy 12 (Stratton) v. Policy 58 (Inner Moray Firth SPA), Policies 13 (Tornagrain) and 20 (Croy Expansion) v. Policy 58 (Loch Flemington SPA). The 'yes/no' scoring could have a 'question mark' score added to tease these issues out.</p>	Noted. As mentioned in the comment above this will be picked up by the HRA of the plan.
<p>Monitoring (pp 70-73) As discussed, it would be useful, to have a section on residual negative effects which can then be particularly allowed for under monitoring arrangements.</p>	Noted. This will be brought forward through future SEA work/
<p>Soil – rather than monitoring the number of planning applications granted for brownfield and greenfield land, it would be more meaningful if the areas of such applications were monitored or more ambitiously if the proportion of total development that was brownfield or greenfield was calculated.</p>	Noted. This would be more useful but it is difficult to monitor. The monitoring as proposed is considered practical and proportionate.
<p>Biodiversity – re designated sites, it would be more accurate to record the numbers of applications that affected them, rather than applications that were within them.</p>	Noted. This would be more useful but it is difficult to monitor compared to applications within designated sites. The monitoring as proposed is considered practical and proportionate.
<p>There is no monitoring detail for protected species. Rather than SNH being responsible for data collation, this is a matter for THC. A simple means may be to monitor the number of applications requiring a protected species</p>	Noted. A monitoring proposal will be brought forward to deal with this issue through the Finalised Environmental Report.

survey and mitigation plan. The different species could be noted within this, and it could be noted whether mitigation depended on a continuing availability of a green network off site.	
Landscape – concentrating on the number of applications within NSAs and SLAs won't capture any effects on landscape character in the wider countryside. In any case, the number of planning applications is no measure of quality or change. Perhaps with the advent of submission of design statements and the production of 'Housing Group Capacity Studies', these could be the basis of monitoring? e.g. the number/proportion of high quality design statements and approaching or reaching landscape capacity.	Noted. This would be more useful but the monitoring as proposed is considered practical and proportionate.
Number of applications refused or recommended for refusal on the basis of landscape or visual impact could be a crude indicator.	Noted. However this is considered a practical method of monitoring effects on the landscape.
It would be helpful to include monitoring of wild areas. The extent and quality of the wildness resource should be monitored through repeated review of maps of wildness (soon to be produced by SNH and to be available to THC).	Noted. While this would be useful at this point we do not have this information at present.
An indicator used by SNH is the visual influence of built development. This is one factor of wildness. See – http://www.snh.gov.uk/publications-data-and-research/trends/scotlands-indicators/naturalheritage-indicators/	Noted.
Appendix 1 – Environmental Protection Objectives of relevant PPS Document 31 – EC Birds Directive (1979) - please note this has been repealed and replaced by the European Birds Directive (2009) – the text in both columns is incorrect, since it refers to climate change and noise. The key consideration is the designation in Scotland of Special Protection Areas (including proposed) and their protection under the Conservation (Natural Habitats, &c.) Regulations 1994 as amended.	Noted. These will be included/updated for the post-adoption statement.
Document 32 – EC Habitats Directive (1992) – again, the text in both columns is incorrect, since it refers to noise and air quality. The key consideration is the classification of Special Areas of Conservation (Including candidate) and their protection under the Conservation (Natural Habitats, &c.) Regulations 1994 as amended.	
Document 38 – Wildlife and Countryside Act 1981 (as amended) – the text in the columns should also refer to the protection this Act affords to various protected species (birds, animals, plants) and the need for the LDP to reflect this.	
Document 41 – UK Climate Change Bill – this should be amended to the	

Climate Change Act 2008 and text amended accordingly.	
Document 81 – Scotland’s Scenic Heritage (1978) – the key application for the LDP is the identification and protection of National Scenic Areas in accordance with the SPP and Circular 9/1987.	
Document 87 – Nature Conservation (Scotland) Act - this Act was 2004	
Document 110 – EPS, Development Sites and the Planning System (2001) - this was published by the Scottish Government (Executive), not SNH. The application text refers to Habitats Regulations Appraisal, but EPS are not considered as part of HRA. The key consideration relates to considering whether EPS are present on any site proposed for development in the plan and if so, incorporating mitigation measures.	
The National Renewables Infrastructure Plan should be added.	
Circulars – Circular 6/1995 (Revised 2000) Habitats and Birds Directives is not listed – see - http://www.scotland.gov.uk/library3/nature/habd-00.asp	
Add also Circular 9/1987 Development Control in National Scenic Areas	
Regional – Core Path Plans should be added.	
Appendix 2 – Baseline Data Information and Maps Climate factors – UKCIP08 should be updated for UKCP09 – see – http://ukclimateprojections.defra.gov.uk/content/view/12/689/	Noted. These will be included/updated for the Finalised Environmental Report, where appropriate.
Soil – the number of GCR sites can be found at – http://www.jncc.gov.uk/page-2949	
Landscape – consideration could be given to applying something similar to the national indicators of built development and of visual influence of built development and land use change – see http://www.snh.gov.uk/publications-data-and-research/trends/scotlands-indicators/indicatorindex/	
Maps The order of the maps could be re-ordered here so that all the natural heritage designations are together.	Noted. It was felt by ordering the maps alphabetically by title they were easier to find however in future SEA work we are happy to arrange them by topic i.e. designated sites, water environment etc.
Caithness and Sutherland Peatlands: this map simply shows the areas designated as SAC/SPA and does not show the whole extent of peatland in Caithness and Sutherland. The note to the map re Caithness and Sutherland v. Highland is inaccurate and should be omitted.	Noted.
If the Council has access to MLURI data it would be preferable if a map of peat distribution across the whole of Highland was included here instead.	Noted. At present that information is not available to us for the whole of Highland.
Special Protection Areas: the recently classified SPAs should be added,	Noted. This will be updated for the Finalised Environmental Report.

e.g. Foinaven, Glen Affric to Strathconon SPAs	
A map of Special Landscape Areas should be added.	Noted. This will be included for the Finalised Environmental Report.
Appendix 3 - Alternatives to which SEA applied An alternative is identified here for Policy 39 (New Settlements), but this is not clearly indicated in the relevant part of the RER (page 28).	Noted.
See also comments above under 'Alternatives'.	Noted.
Appendix 4 – Vision/Spatial Strategy/Policy Assessments General points – We welcome the inclusion of a separate SEA Objective with regard to wild land/wild areas, and we welcome the reorganisation of the key considerations following comments from the consultation authorities. However these 'key considerations' differ from the 'issue checklist questions' used for the site assessments in Appendix 5. This is very confusing. While the key considerations are now quite comprehensive, the issue checklist questions have gaps, e.g. in respect of SEA Objectives 2 (green networks), 3 (understanding and enjoyment), 6 (access) and 7 (soils – in relation to greenfield land).	Noted. Throughout the process we have taken on board comments from the consultation authorities in relation to the layout and assessment methodology of the plan. In doing so we believed that we had addressed many of these concerns at an earlier stage in the SEA process if they were raised. The two appendices of assessments, appendix 4 dealt solely with the policies, spatial strategy and visions and appendix 5 dealt with site allocations only. The planning authority felt that this methodology would make it clearer and easier to understand the assessments as each has separate considerations under the same SEA objectives. In terms of identifying residual effects then this is something we will take forward in future work on Strategic Environmental Assessment.
It is difficult to follow how the assessments of the allocation policies (1-28) should be read across both Appendices 4 and 5. There are apparent mismatches between the scoring in Appendices 4 and 5 for equivalent topics. It would be much more preferable for one appendix only to cover assessment of sites.	Noted. This was to ensure all bases of the policy and allocation had been covered. However, this type of policy and allocation will not be taken forward in future plans however we will take on board these comments in future SEA work.
More clarification is needed with regard to the definition of '+', '-' and '=' scores. It is stated that + and – are no or minimal impacts, but if = (neutral) is no impact, then + and - should be minimal impacts. Does 'neutral' mean no impact, or does it mean that any minimal negative impact is offset by mitigation already in the plan? Throughout the assessment, the default score seems to be '='. This is particularly obvious for objective 18 (wild land), for which many policies will actually have no effect, as this objective is only relevant with respect to remote areas, in which case an additional 'n/a' 'score' should be included.	Noted. This has been clarified in the Finalised Environmental Report.
There is frequent reference under SEA Objective 1 to designated sites only – but this objective should include biodiversity, habitats and species more generally, particularly protected species which are widespread throughout the plan area. This has led to Objective 1 being incorrectly dismissed under	Noted. This will be considered in future SEA work by the Council to ensure this is not repeated.

many of the Policy headings.	
Objectives 16 and 17 (landscape) are frequently dismissed in this Appendix as not relevant. However this misses the opportunity to aim to make these positive. Large scale housing developments have the potential to have a negative landscape effect, even more so if taken cumulatively.	Noted.
The comments in the following section are matters of detail on the assessment. While noted and will be considered in bringing forward the Highland-wide Local Development Plan in terms of commending changes to the policy through the examination no changes will be made to the contents of the assessments as part of the Finalised Environmental Report.	
Visions – general point There is a sense of a ‘missed opportunity’ where the assessment is scored as neutral. Might it have been possible for the SEA process to have led to more positive assessments for the visions across the range of SEA objectives? Green networks for example should be mentioned in all of the visions, not just for the Inner Moray Firth.	Noted. This has been taken on board and through representations on the plan itself there may be further changes to the visions.
It would be clearer if the order of visions in this document is the same as that of the Proposed Plan.	Noted.
Vision – Caithness and Sutherland This vision significantly differs to the others because it includes reference to attracting enterprises by a more flexible planning regime throughout Caithness. The likely significance of this for the environment doesn’t appear to have been considered here.	Noted. The issue has been considered. This can be seen through not just the assessment of the vision but the associated policies/allocations which support the vision.
Vision – Inner Moray Firth Objective 3 (contact with the natural heritage) – this states that responsible access will be encouraged by the Green Network Supplementary Guidance. However this message doesn’t come across in the current draft of the GN SG.	Noted. The green network: supplementary guidance is currently subject to changes following the consultation period.
Objective 7 (soils) – it is unclear how the positive score has been given here when the text says the vision makes no reference to protecting soil functions (although there is reference in the vision to use of brownfield land in the city – so on balance would a +/- score be fairer?)	Noted.
Objective 12 (climate change) – the text says the vision does not make specific reference to climate change, but it does – both in terms of the location of new development and allowing for the movement of species.	Noted however these are considered contributors to lessen the impact of climate change rather than specifically reference climate change as a whole/
Objectives 16 and 17 (landscape) – these are scored as positive, yet there is no specific reference to the landscape character and setting of the Inner Moray Firth – unless this is implicit in the ‘special places’ of this area?	Noted. It was considered that this was implicit in the special places of the area.

<p>Policy 1 (City sites) Objective 1 (biodiversity) – there should be consideration here of protected species. Badgers are particularly relevant.</p>	<p>Noted.</p>
<p>Objective 2 (green networks) - it is unclear if the new provisions of this plan will apply to these sites. If so, the positive implications for the green network are understandable. If not, this could be overstated.</p>	<p>Noted. The plan should be read as a whole and as such the principles of the green networks will be applied to all sites.</p>
<p>Objectives 16 and 17 (landscape) - although the text highlights that the expansion areas of Culduthel, Slackbuie and Milton of Leys are already allocated in the Local Plan, they will nevertheless negatively affect these SEA Objectives by their siting and extent which will result in adverse impacts on the key characteristic of the open hill backcloth to the city as highlighted as being important within the LCA.</p>	<p>Noted.</p>
<p><u>Policy 4 (Longman Core Development Area)</u> Objective 2 (green networks) – in the past there have been plans to enhance the gateway to the city, including plans for a green avenue. If this is still a part of the concept for the redevelopment of this area, then this could be scored as positive rather than neutral.</p>	<p>Noted. Given that the Longman Core Development Brief will be under review over the course of the year then it was not considered appropriate to score the site positively until the plans for the area become clearer. This may come through the Inner Moray Firth Local Development Plan.</p>
<p>Objective 4 (human health) – another justification for the positive score would be its close proximity to transport hubs.</p>	<p>Noted.</p>
<p>Objective 16 and 17 (landscape) – as above there have been proposals before for an enhancement project in this area to improve one of the key gateways to Inverness. If the masterplan continued to strive to improve the gateway to the city, a positive score could be recorded under these objectives.</p>	<p>Noted. See comments above.</p>
<p><u>Policy 5 (Longman landfill site)</u> Neutral score re Objective 1 (biodiversity) – this may be over-simplified given proximity to Inner Moray Firth SPA and Ramsar. Any development in this area is likely to have a likely significant effect on the designation and will therefore be included in the Habitats Regulations Appraisal for the Plan. The outcome of this appraisal should inform this score.</p>	<p>Noted. The HRA of the plan will give further consideration to this issue.</p>
<p>Neutral scores re 3 (enjoyment/understanding) and 4 (human health) – these scores are unclear when the policy makes possible provision for community/public open space here, for a site near the coast, which points to a positive score if this option is pursued.</p>	<p>Noted. This score was attributed as it gave an indication that through development this could be secured and these should be a key consideration on the design brief.</p>

Neutral scores re 16 and 17 (landscape) – it is unclear if this allows for the visual and landscape impact of possible large scale development on this prominent site at a gateway to Inverness. If carried out sensitively, there could be positive effects on Objectives 16 and 17. This would, however, depend on the masterplan and mitigation of impacts associated with the existing stadium area.	Noted. Mitigation is key to ensuring this site does not have significant adverse impacts on this SEA objective.
<u>Policy 6 (Muirtown/South Kessock)</u> Neutral score re 1 (biodiversity) – this is questionable in view of the inclusion within the site of Merkinch Local Nature Reserve and the adjacent Moray Firth SAC. There are also many protected species within this area including sightings of otter in the Muirtown Basin. We have recommended elsewhere that the LNR should be excluded from this allocation (or protected/enhanced) and that this policy should be included within the HRA for the plan.	Noted. The exclusion of the LNR is being taken forward as an outstanding issue.
Neutral score re 2 (green networks) – there appears to be a missed opportunity here to make this positive, given the presence of the Caledonian Canal and LNR here (beneficial for both wildlife and people).	Noted.
Neutral score re 3 (enjoyment/understanding) – this score is unclear given that the site is adjacent to the Merkinch LNR and the Beaully Firth, together with the canal and river. The opportunity should be taken to make this policy positive for this objective. As well as all the bird and plant life, South Kessock is a good place from which to watch the Moray Firth dolphins and to spot otters. The Ferry Ticket office has been developed into a visitor centre showcasing the area's wildlife. The LNR group work hard to promote the area and the policy should complement this.	Noted. It is considered that development in this area could, if not designed appropriately could have significant adverse impact on the SEA objective. Mitigation will be set out to ensure that this is not the case in the Inner Moray Firth LDP.
Objective 5 (open space) – effort should be made through this policy to achieve a positive rather than a negative score, given the existing green space in this area re the LNR and canal corridor.	Noted. Mitigation on this issue will come forward through the IMF LDP
Neutral score re 6 (access) – there appears to be a 'missed opportunity' here to add something in the policy about the need to protect the well used paths in the site e.g. the canal towpaths, the paths in the LNR, or to cross-refer for mitigation to the policy on public access.	Noted. Mitigation on this issue will come forward through the IMF LDP
In addition the policy should seek to protect and enhance the use of the water environment for public access. For example the Muirtown Basin is used heavily by the Inverness Canoe Club and the 18 th Inverness Muirtown Sea Scouts. The canal is also part of the popular Great Glen Canoe Trail.	Noted. Mitigation on this issue will come forward through the IMF LDP

Given the nature of the site, it is questionable to say here that it is unlikely that there will be an impact on this SEA Objective through implementation of this policy.	
Neutral score re 16 and 17 (landscape) – here again seems to be a missed opportunity to consider how this could be converted to a positive score, given that landscape is a key issue here.	Noted. Mitigation on this issue will come forward through the IMF LDP
Policy 7 (Inshes and Raigmore) Neutral score re 3 (contact with nature) – there are a number of different land uses in the Inshes and Raigmore area including a Business Park, Hospital and Retail. It is important to recognise the benefit of good quality greenspace in areas where people are ill, work and shop as well as where people live. It would be good to see that reflected in this policy and so the opportunity taken to move this score from neutral to positive.	Noted. This is something the Council intend to progress through the development brief for the site.
Neutral score re 6 (access) – in the past there was a project called ‘Paths Around Inverness’ which linked up streets/pavements and paths in Inverness, creating a path network. The opportunity could be taken to link into this by means of such policies, so enabling a neutral score to be improved to a positive score.	Noted. This is something that is currently being considered through the Inverness City Vision and will be brought forward through emerging development briefs
Policy 8 (Ness-side and Charleston) Neutral score re 1 (biodiversity) – we comment elsewhere that badger surveys should be carried out for these sites – a developer requirement could be added.	Noted. This mitigation will be brought forward through the Inner Moray Firth LDP.
Neutral score re 2 (green networks) – it is unclear how this is scored as neutral for green networks for these areas that are presently likely to be contributing to the habitat green network through proximity to the river, field boundaries and woodland. If this is scored on the assumption that any negative effects will be offset by application of the separate policy on green networks, this should be stated – a developer requirement to this effect could be added	Noted. The plan should be read as a whole, developer contributions for this site will be brought forward through the Inner Moray Firth Local Development Plan.
Neutral score re 6 (access) – it is unclear why this is scored as neutral when for example the Great Glen Way passes through the Charleston site (unless the policy on LDRs is being applied as mitigation – a developer requirement could be added).	Noted. The plan should be read as a whole this would ensure that access is a key consideration.
Neutral score re 9 (water environment) – this does not seem to take account of the location being adjacent to the River Ness and the Holm Burn. With reference to the Holm Burn there is a community project	Noted.

planned to tackle Invasive Non Native Species here.	
Policy 9 (A96 Corridor) Objective 1 (biodiversity) – reference should be made here to the HRA process and the designated sites both within, adjacent and distant from the corridor that may be affected by the proposals.	Noted. The HRA is currently in production and this will be taken into consideration.
Neutral score re 3 (contact with nature) – part of the role of the Green Network will be to increase people’s contact with the natural heritage, so there is scope to convert this to a positive score. .	Noted.
Neutral scores re 16 and 17 (landscape) – it is unclear on what basis any possible landscape effects are being discounted here (including cumulatively).	Noted.
Policy 11 (Inverness Retail and Business Park Expansion) Neutral scores re 1 (biodiversity) – this says that ‘there may be impacts on designated sites at a site specific [level] which will be identified through the SEA site assessments ...’. However this SEA Objective is not just about designated sites, but about wider habitats and species for biodiversity. The policy already includes the need for safeguarding of habitats for protected species, with protected species surveys and protection plans including for badger. The SEA here should reflect this, presumably having informed it.	Noted.
+/- score re 3 (enjoyment/understanding) – it is stated that if there are suitable opportunities [for] people to come in contact with and appreciate nature/natural environments this will be identified through the SEA site assessment. However as noted above, SEA Objective 3 is not covered by any of the issue checklist questions considered in Appendix 5. So this assessment is incomplete in this regard.	Noted. However, it is considered that the site assessment matrix has included mitigation to ensure the that this score can be attributed.
Policy 12 (Stratton) +/- score re 1 (biodiversity) – the reasoning for this score is not explained (although the reader may be expected here to refer to Appendix 5). However developer requirements already include some reference to nearby designated areas (not complete) and to protected species on the site. The relationship between this part of the SEA and the Proposed Plan is not clear. Badgers are an issue here.	Noted.
+/- score re 3 (enjoyment/understanding) – it is stated that if there are suitable opportunities [for] people to come in contact with and appreciate nature/natural environments this will be identified through the SEA site assessment. However as noted above, SEA Objective 3 is not covered by	Noted. This has been clarified in the Finalised Environmental Report. As it can be seen fro the final content of the plan the SEA has had influence over the policy in this regard.

any of the issue checklist questions considered in Appendix 5. So this assessment is incomplete in this regard. On the other hand, references are already made in the policy to green networks, open space and a recreational management plan, so here again the relationship between this part of the SEA and the Proposed Plan is not clear.	
Objective 6 (access) – this specifically mentions contributions towards provision of a coastal trail, but this should be reviewed in the light of the HRA of the plan (see comments elsewhere on Policy 12).	Noted. The HRA of the plan is currently in progress as is a separate HRA of the Coastal Trail.
Neutral scores re 16/17 (landscape) – it is not clear from this part of the SEA how this assessment has been reached, although it is noted that the policy includes the need for a “Landscape Framework”.	Noted. A neutral score was reached as although there will be a material change in the landscape this could be mitigated through appropriate landscaping, provision of open space and high quality design and place-making.
Policy 13 (Tornagrain) +/- score re 1 (biodiversity) – this compares with neutral scoring in Appendix 5 for the equivalent issue checklist questions, so the methodology approaches between Appendix 4 and Appendix 5 is unclear. We note the developer requirements already included in the policy for Tornagrain, although Loch Flemington SPA is not included. Loch Flemington SPA needs to be added to the policy in the proposed plan and included as part of the HRA of the plan.	Noted. This has been clarified in the Finalised Environmental Report.
Neutral scores re 16/17 (landscape) – it is not clear from this part of the SEA how this assessment has been reached, although it is noted that the policy includes the need for a “design framework”.	Noted. A neutral score was reached as although there will be a material change in the landscape this could be mitigated through appropriate landscaping, provision of open space and high quality design and place-making.
Policy 14 (Whiteness) Neutral score re 1 (biodiversity) - if the site is developed for housing then this objective should be scored negative – as indeed it is in Appendix 5. If this proposed allocation is developed as a renewables manufacturing/assembly base then appropriate mitigation could potentially bring it up to neutral as scored here. The relationship between the scoring of Appendix 4 and Appendix 5 is confusing.	Noted. This has been clarified in the Finalised Environmental Report.
Positive scores re 2 (green networks), 5 (open space) and 6 (access) – given that the site already has outline planning permission, and therefore there are no developer requirements listed, it is unclear on what these scores are based (e.g. the terms of the outline consent, the requirements of masterplans, compliance with supplementary guidance?). This should be	Noted. This has been clarified in the Finalised Environmental Report. Condition 1 stated that open space, paths, trails and recreation will all be reserved matters to be agreed by a future planning application for Matters Specified in Conditions.

clarified.	
Neutral score re 3 (contact with nature) – it can be noted that plans are already advanced for the housing development to include a hide by the lagoon to enable bird watching.	Noted.
Policy 15 (Lochloy) Neutral score re 5 (open space) – here and elsewhere as a general point it would be encouraging to see the SEA process used to improve a neutral score to a positive score through modification of the relevant policy.	Noted.
Policy 16 (Sandown) This policy contains no developer requirements, in contrast to the adjacent Delnies site. While Appendix 4 doesn't clearly lead towards the need for developer requirements, Appendix 5 does. These include – Objective 1 (biodiversity) – measures to avoid any adverse effects on the nearby Inner Moray Firth SPA, Moray Firth SAC and Whiteness Head SSSI; protected species survey (badger especially) and mitigation plan; Access Management Plan. Objective 2 (green network) – linkage to green network within and around the site Objective 5 (open space) – open space provision Objective 6 (access) – Recreation Management Plan	Noted. The site is subject to an existing allocation in the Nairnshire Local Plan (2000). A development brief will be brought forward which will outline the developer requirements for the site, taken from this SEA. Further detail on this allocation will be brought forward through the Inner Moray Firth Local Development Plan.
Objectives 16/17 (landscape) – there is presently no mention of the masterplan needing to respond to the sensitivities and opportunities of the landscape and visual resource, so it is unclear on what this score is based. It is recommended that this policy is re-worded to require the proposal to respond to landscape and visual issues and for this to be planned through the development of a Landscape Framework Plan and incorporated within the development design objectives.	Noted. This will be brought forward through the Sandown Development Brief and the Inner Moray Firth Local Development Plan.
Policy 17 (Delnies) Neutral scores re 16/17 (landscape) – there is presently no explicit developer requirement in this policy for development on this site to relate to the landscape and visual resource, so it is unclear on what this score is based. Addition of a developer requirement for a Landscape Framework Plan and for the design masterplan to respond to the sensitivities of the landscape and visual resource would recognise this site's gateway position at the western approach to Nairn.	Noted. This has been clarified in the Finalised Environmental Report.

<p>Policy 18 (Nairn South) Objective 1 (biodiversity) – there is no reference to protected species here, but a protected species survey is required in the policy wording.</p>	Noted. This was an oversight and it will be clarified in the Finalised Environmental Report.
<p>Policy 19 (Smaller Settlements in the A96 Corridor) Objective 1 (biodiversity) – this should refer to the HRA of the plan in terms of designated sites Policy 20 (Croy Expansion)</p>	Noted. The HRA of the plan has addressed this issue.
<p>+/- score re 1 (biodiversity) – this policy needs to include references to nearby designated sites – Kildrummie Kames SSSI and Loch Flemington SPA.</p>	Noted. This has been clarified in the Finalised Environmental Report.
<p>Policy 23 (Cawdor) Objective 1 (biodiversity) – this should refer to the HRA of the plan in terms of designated sites, especially re Cawdor Wood SAC.</p>	Noted. This has been clarified in the Finalised Environmental Report. The HRA of the plan has addressed this issue.
<p>Objectives 16 and 17 (landscape) - the large extent of development proposed could result in negative impacts on these objectives, mainly because of the limited capacity of the area to accommodate new development without appearing incongruous to the existing special qualities of the settlement which are strongly based on its concentrated and small-scale form and rural character.</p>	Noted. It is considered that through appropriate mitigation including landscaping and high quality design that there will be limited affect of this development on the landscape. In addition while the whole site is allocated much of the site will remain open and not be developed.
<p>Policy 24 (Nigg) Objective 1 (biodiversity) – this should refer to the HRA of the plan in terms of designated sites, especially re Moray Firth SAC.</p>	Noted. The HRA of the plan has addressed this issue.
<p>Policy 25 (Dounreay) Objective 1 (biodiversity) – this should refer to the HRA of the plan in terms of designated sites, especially re North Caithness Cliffs SPA Extension.</p>	Noted. This has been clarified in the Finalised Environmental Report. The HRA of the plan has addressed this issue.
<p>Policy 32 (Developer Contributions) Objective 2 (green networks) - as discussed elsewhere, it may be clearer if this policy referred explicitly to green infrastructure in order that a clear link is made with open space, green networks, landscaping etc</p>	Noted. This has been taken forward as an outstanding issue to examination.
<p>Policy 36 (Housing in the Countryside – Hinterland Around Towns) It is stated that the supplementary guidance on Housing in the Countryside and on Siting and Design Guidelines will be subject to a separate SEA process, but we are unaware so far of the Environmental Reports associated with these.</p>	Noted. This will be carried out in due course.
<p>Neutral score re 1 (biodiversity) – this policy encourages the conversion of traditional buildings into dwellings. Protected species, for example bats, are often found in old steadings. This should be taken into account. Thus a</p>	Noted. It is considered that as the plan must be read as a whole that there would not be the need for a cross reference to other policies in the plan.

negative score on this factor would have enabled consideration of whether the 'catch-all' reference to the general policies in the plan is sufficient mitigation.	
Neutral scores re 16 and 17 (landscape) – the basis for this is unclear.	Noted. This has been clarified in the Finalised Environmental Report.
Policy 37 (Development in the Wider Countryside) It is stated that the supplementary guidance on Housing in the Countryside and on Siting and Design Guidelines will be subject to a separate SEA process, but we are unaware so far of the Environmental Reports associated with these.	Noted. This will be carried out in due course.
Objective 1 (biodiversity) - as discussed elsewhere, there is no reference in this policy to the other general policies of the plan, nor to the Siting and Design Supplementary Guidance	Noted. It is considered that as the plan must be read as a whole that there would not be the need for a cross reference to other policies in the plan.
Therefore we believe in order to score this as neutral rather than negative, an addition should be made to the policy as for Policy 36 – 'All proposals should accord with the general policies of the Plan and the Siting and Design Guidance'.	Noted. It is considered that as the plan must be read as a whole that there would not be the need for a cross reference to other policies in the plan.
Neutral scores re 16 and 17 (landscape) – the basis for this is unclear.	Noted.
Policy 39 (New Settlements) Neutral scores re 16 and 17 (landscape) – the basis for this is unclear.	Noted. This has been clarified in the Finalised Environmental Report.
Policy 42 (Business and Industrial Land) Neutral scores re 16 and 17 (landscape) – these scores are unclear, given that the policy offers scope for currently non-allocated land to be used for business and industry.	Noted. As the policy makes provision for development of alternative sites this at present can not be assessed in terms of its impact on landscape because the sites are not yet known.
Policy 45 (Tourist Accommodation) +/- score re 1 (biodiversity) – mitigation would be possible for this score if more reference was made to other plan policies or to avoidance of adverse effects on natural, built or cultural heritage. The cross reference to Policy 37 (wrongly referred to in the plan as Policy 36) can be boosted by this policy being amended as noted above.	Noted. It is considered that as the plan must be read as a whole that there would not be the need for a cross reference to other policies in the plan.
Policy 48 (Inbye/Apportioned Croftland) Positive score re 1 (biodiversity) – this could alternatively be +/- because both in-bye and common grazings land may be valuable for biodiversity, so depending on where housing is directed, there could be an effect under either scenario.	<u>Noted.</u>
Positive score re 16/17 (landscape) – the policy allows for single housing development both on in-bye land and common grazings land, depending	Noted. These comments have been considered in preparation of the next draft of the Housing in the Countryside Siting and Design

<p>on particular circumstances. This would have differing landscape effects in crofting areas. Also the reference to the Siting and Design Guidance is limited in that this guidance relates to housing in the countryside generally and at present does not adequately address the specific landscape and visual issues associated with the siting and design of housing in crofting areas. Also the policy implies a flexible approach could be taken to single house developments in crofting areas in NSAs where a wider community interest had been demonstrated. This could have negative landscape effects. Therefore it would appear that a +/- score is more realistic, and mitigation could include production of additional guidance on Siting and Design of Houses in Crofting Landscapes.</p>	<p>Guidance.</p>
<p>Policy 49 (New/Extended Crofting Townships) Objective 16 (landscape) - the measure of '++', significant positive impacts for this objective is too high and is inconsistent with the judgement of this measure for other aspects. It should be minimal positive impact at most, '+'. Principally this over-estimation seems to have resulted from insufficient recognition of some of the typical negative impacts of extending and establishing new crofting townships even where the Siting and Design guidance is applied. For example, new contemporary / extension of townships typically involves greater prominence of access routes, buildings much larger than historic structures, the use of fences rather than stone walls, extensive sheep grazing rather than cropping that created a distinct landscape pattern, and pressure to extend onto open areas and sloped ground that was originally the visual backdrop/ limiting edge to the crofting settlement.</p>	<p>Noted. It is considered that the creation of new/extended crofting townships can lead to a significant improvement to the landscape. The detail of individual proposals impact on the landscape should be dealt with at a planning application stage.</p>
<p>Policy 50 (Coastal Development) Objective 17 (landscape character and scenic value) - it is not clear why it is stated that this policy is not relevant to this objective, especially as the policy refers to coastal scenic views.</p>	<p>Noted. This has been clarified in the Finalised Environmental Report.</p>
<p>Policy 51 (Aquaculture) Neutral score re 18 (wild areas) – the justification reads as though this should be scored as positive. However the justification refers to this policy being tied to the Coastal Development Strategy (in which Isolated Coast is identified), which it isn't. So this indicates that this policy should be amended to include an explicit reference to the Council's Coastal Development Strategy Supplementary Guidance.</p>	<p>Noted. This has been clarified in the Finalised Environmental Report.</p>

<p>Policy 53 (Development in Woodland) Positive scores re 1 (biodiversity) and 2 (green networks) – it seems more logical to score these as +/-, because this policy concerns the principle of development in woodland; however it includes protection for more important woodland re biodiversity and green networks</p>	<p>Noted. This score is considered appropriate as the policy restricts the development in woodland, therefore having a more positive affect on biodiversity and green networks.</p>
<p>Policy 54 (Minerals) Positive scores re 1 (biodiversity) and 16 (landscape) – these are scored as positive because of biodiversity, geodiversity and landscape benefits in the longer term after restoration. However in the shorter term during extraction of minerals they might have to be scored as negative. Geodiversity should more properly be considered under SEA Objective 7 than SEA Objective 1.</p>	<p>Noted.</p>
<p>Policy 56 (Peat and Soils) Objective 12 (climate change) – a link with climate change adaptation could be considered here re the carbon storage value of peat soils.</p>	<p>Noted.</p>
<p>Policy 62 (Landscape) Objective 18 (wild land) - the sensitivity for this objective should not be low – it should be medium. Although this policy is not focused on wild land qualities, these can form part of the key characteristics and special qualities of the landscape and thus will be covered in part by this policy. Thus it is believed that this policy would result in slight positive impact on this objective.</p>	<p>Noted. This has been clarified in the Finalised Environmental Report.</p>
<p>Policy 63 (Geodiversity) As per previous comments the focus should be on Objective 7 rather than Objective 1.</p>	<p>Noted.</p>
<p>Objective 12 (climate change) – a link with climate change adaptation could be considered here re geodiversity including natural coastal processes.</p>	<p>Noted.</p>
<p>Policy 66 (Waste Water Treatment) Neutral score re 1 (biodiversity) – here should be picked up discharge into SACs, such as the Moray Firth SAC (bottlenose dolphin). In situations where the area over which discharge of waste water is likely to disperse in 12-24 hrs overlaps with areas known to be frequently used by dolphins, the treatment level should meet a bathing water standard (applied throughout the year rather than just for the June-September period). To mitigate this potential negative effect, we have recommended text to this effect be added to the plan.</p>	<p>Noted. This has been clarified in the Finalised Environmental Report. The HRA will address this issue further and recommend wording.</p>

<p>Policy 67 (Surface Water Drainage) Neutral scores re 1 (biodiversity) and 2 (green networks) – we would have expected these to be scored as positive in view of their promotion of SuDS, e.g. watercourses are one of the habitats included in the Green Network Supplementary Guidance.</p>	Noted.
<p>Policies 68 (Renewable Energy Developments) and 69 (“Community” Renewable Energy Developments) Positive scores re 1 (biodiversity) and 3 (contact with nature) – it is unclear why these have been scored as positive, and a more understandable score would be neutral. ‘++’ score re 17 (landscape character and scenic value) - it is not clear how this policy would have significant positive impacts on this objective. It is judged that this would have at best only slight positive impact. This is partly because of the inherent impacts of many types of renewable energy development and the sensitivity of the Highland landscape to this, and because of the threshold of acceptability being set at ‘significantly detrimental’. In addition, the measures for Objective 17 seem inconsistent with those for Objective 18 when protection for both is offered in relation to the policy on ‘natural, built and cultural heritage features’.</p>	Noted. This has been clarified in the Finalised Environmental Report.
<p>Policy 70 (Electricity Transmission Infrastructure) Neutral score re 18 (wild land) – the basis for stating that ‘it is unlikely that this policy will have a direct effect on this objective’ is unclear. It is believed that this policy may have an impact on this objective as electricity transmission infrastructure may be located through or adjacent to wild areas and it may not be possible to mitigate impacts by a significant level as these result from any structure being visible whatever its design.</p>	Noted.
<p>Policy 71, 72 (Waste Management Facilities and Sites) Neutral score re 1 (biodiversity) - it is stated that it is unlikely these policies will directly affect this objective. However these policies include reference to the former Longman Landfill Site for new waste management facilities. This could have effects on habitats and species, including the Inner Moray Firth SPA and Ramsar.</p>	Noted. This will be brought forward through the HRA of the policy.
<p>Policy 75 (Green Networks) Neutral score re 12 (climate change) – one of the functions of green networks is to help species to adapt to climate change through enabling them to move about. So this should be scored positive or even ++.</p>	Noted.

<p>Policy 77 (Playing Fields and Sports Pitches) Objective 2 (green networks) – the contribution these areas make for wildlife and informal recreation will depend heavily on good practice design. As part of this process it will be important to minimise potential conflict between the use for formal recreation and the potential also for wildlife and informal recreation.</p>	<p>Noted. This good practice design is encouraged through the Open Space in New Residential Development which this policy is linked to</p>
<p>Policy 79 (Long Distance Routes) Neutral scores re 4 (human health) and 14 (active travel) – the assessment here considers LDRs are used by tourists rather than residents, but this fails to recognise the local use made by residents of parts of LDRs on their doorsteps, e.g. the Great Glen Way on the edge of Inverness. Under this policy would also presumably be developed more localised trails, such as between Inverness and Nairn.</p>	<p>Noted.</p>
<p>Alternatives General point – it would be helpful if the basis for the assessment of alternatives was made clearer. The scoring could be based on either (a) deleting the policy in question, or (b) how the issue would be covered in the absence of the policy in question. We presume the latter is the intent.</p>	<p>Noted. This clarification will be brought forward in future Local Development Plans.</p>
<p>Alternative to Policy 27 (Castletown) Objective 7 (soils) – this refers to the Inverness Local Plan rather than the Caithness Local Plan. details of proposals for new crofting townships to be brought forward through the Area LDP process;</p>	<p>Noted. This is a typographical error and will be corrected prior to adoption of the plan.</p>
<p>Alternative to Policy 49 (New/Extended Crofting Townships) It would appear there are two alternatives here, but they have been assessed as one: new crofting townships only to be located outwith the hinterlands of towns It would be clearer if these were separated out.</p>	<p>Noted. The alternatives as presented at the Main Issues Report stage have been consolidated as an alternative.</p>
<p>Alternative to Policy 53 (Development in Woodland) An issue here is how this policy compares to the standing policy under the Control of Woodland Removal Policy.</p>	<p>Noted.</p>
<p>Alternative to Policy 54 (Minerals) Objective 1 (biodiversity) – this includes consideration of geodiversity, but this should be covered under SEA Objective 7 (soils) and indeed is so (so at present is being double counted).</p>	<p>Noted.</p>

<p>Alternative to Policies 59-61 (Habitats and Species) Objective 1 (biodiversity) – although the alternative of one combined policy has been scored as ++, there is likely to be confusion as to which habitats and species are covered by which legislation or strategy, and what policy protection is afforded by the relevant legislation/strategy. We agree with the concluding commentary.</p>	Noted.
<p>Alternative to Policies 73-74 (Pollution and Air Quality) This is incorrectly headed with reference to Policies 75-79.</p>	Noted. This typographical error will be corrected prior to the adoption of the plan.
<p>Alternative to Policies 75-79 (Green Networks, Open Space, Playing Fields, Sports Pitches, Access and Long Distance Routes) We agree with the concluding commentary.</p>	Noted.
<p>Appendix 5 General points - It is unclear how these ‘issue checklist questions’ relate to the ‘key considerations’ listed for each SEA Objective at the beginning of Appendix 4.</p>	The two appendices of assessments, appendix 4 dealt solely with the policies, spatial strategy and visions and appendix 5 dealt with site allocations only. The planning authority felt that this methodology would make it clearer and easier to understand the assessments as each has separate considerations under the same SEA objectives.
<p>While there are a number of ‘key considerations’ for each SEA Objective, there are not ‘issue checklist questions’ for all SEA Objectives – for example it would appear as though there are gaps in respect of Objectives 2 (green networks), 3 (enjoyment/understanding), 6 (access) and 10 (water abstraction), SEA Objective 7 re the safeguarding of soil quality and quantity is not covered. There is an issue included re brownfield land (no 8) but no equivalent issue re greenfield land. Therefore the significant effect (including cumulatively) on greenfield land is not being picked up in this part of the SEA. Also any effects on peat and geodiversity are not being picked up</p>	Noted. This will be taken on board for all future SEA work and it will be made clear which questions relate to which SEA objective(s).
<p>The ordering is not easy to follow – they do not follow the sequence of the SEA Objectives and similar aspects are separated, e.g. landscape issues are numbered 10, 11 and 25</p>	Noted. This will be taken on board for future SEA work.
<p>Issue 10 makes no reference to areas designated for landscape (NSAs and SLAs) in terms of assessing effects on their special qualities</p>	Noted. This will be taken on board for future SEA work.
<p>Issue 11 could now refer to wild areas as opposed to remote landscapes of value for recreation</p>	Noted. This will be taken on board for future SEA work.
<p>Issue 18 should be amended to: “Will the allocation affect any protected species or any priority habitat or species?” – (priority habitats and species has a very specific meaning in relation to the Habitats Directive, whereas</p>	Noted. This will be taken on board for future SEA work.

<p>references in the Interpretation box to the Wildlife and Countryside Act, the Birds Directive, EPS and BAP relate instead to protected species (to which should be added badgers under the Protection of Badgers Act) On several occasions the assessment here identifies a negative effect and simply says that 'due consideration' should be given to this issue, or that 'appropriate mitigation' should be provided. While it is useful to have identified the issue, the SEA is not then fully providing measures to prevent, reduce and as fully as possible offset these adverse effects</p>	
<p>The sites are not assessed in the order they appear in the Proposed Plan – it would be much easier if they followed the same order</p>	<p>Noted. This will be taken on board for future SEA work.</p>
<p>There should be references where applicable to the need to take account of the Habitats Regulations Appraisal of the plan, including European sites that may be affected by the wider cumulative impacts</p>	<p>Noted. This will be taken on board for future SEA work where we intend to carry out the HRA of the plan in tandem with the SEA.</p>
<p>The entries here frequently comment that 'Developments with residential issues are likely to be required to deliver additional open space provision in line with the Open Space in New Residential: Supplementary Guidance' (under issue 1) and that 'protected species are known to be present and that surveys may be required' (under issue 18). This phraseology is non-committal and therefore does not provide confidence that these measures will be implemented and certainly does not promise the positive impacts suggested by the assessment.</p>	<p>Noted. By carrying the outcomes of these assessments forward in to the plan as developer requirements it is intended that a commitment to the mitigation will be made.</p>
<p>Under Issue10 there is frequent reference to the relevant Landscape Character Assessment for the landholding but no action or mitigation is listed.</p>	<p>Noted. This has been clarified in the Finalised Environmental Report.</p>
<p>The Green Network Supplementary Guidance is under-represented throughout this appendix. Where it is referred to this is under issue 10 as opposed to issues 2 and 18.</p>	<p>Noted.</p>
<p>It is disappointing to see developments being dealt with in isolation in relation to issue 18 (priority habitats and species). Badgers are present on many of the proposed allocation sites around Inverness and along the A96 corridor (Policies 1 (all allocations), 8 (both allocations), 9 (all allocations), 10, 11, 13, 15, 16, 17, 18, 20, 21 and 23 are all relevant).</p>	<p>Noted.</p>
<p>A collaborative, strategic approach to surveying and mitigation at the pressure points would be beneficial for both the species and the developers working in the following areas:</p>	<p>Noted. This type of approach will be taken forward in future SEA work.</p>
<p>Southern Distributor Corridor, the 'Golden Mile', Tornagrain and Nairn</p>	<p>Noted.</p>

sites. This approach is advocated by the Green Networks Supplementary Guidance as well as the Badger Policy Guidance Note. Joined up thinking is not explicitly encouraged here and we see this as a missed opportunity. Without a joined up approach the impact on the badger population for many of the policies will be negative. With a joined up approach a neutral score may be possible.	
The Inner Moray Firth Ramsar site is frequently not referred to where it is applicable and where the Inner Moray Firth SPA is listed. Also please note that Ramsar is a place rather than an acronym.	Noted
There are a few typos in the document where SDA is used rather than the correct SPA.	Noted. These typographical errors will be corrected prior to the adoption of the plan.
Policy 8 (Ness-side and Charleston) No developer requirements are set out here because it is stated that the areas may have planning permission already. However the policy says that masterplans should be prepared to be adopted as supplementary guidance to this plan. Therefore this SEA can set out the elements to be addressed in the masterplan e.g. protected species survey and mitigation plan and a landscape plan	Noted. The mitigation which can be identified from these assessments will be brought forward through both the development brief for the site and the Inner Moray Firth Local Development Plan.
Policy 7 (Inshes/Raigmore) Issue 1 comments that as residential issues are unlikely within this allocation the Council would not need to apply the Open Space Supplementary Guidance. However open space in non-residential areas is also beneficial, especially near hospitals, where research has shown that they are an important factor in relation to people's recovery from illness.	Noted.
Policy 3 (Inverness City Centre) - The footprint of this allocation includes part of the Inverness Escarpment which is a green space. We are aware that Greeninverness were investigating the possibility of an enhancement project for the escarpment.	Noted.
Policy 6 (Muirtown and South Kessock) The identified mitigation is not copied across to the Proposed Plan, and it is unclear why this is so – even the need for a masterplan for these sites could be informed by such mitigation steps in the plan. There is a particular issue with regard to the nearby European sites, which must be addressed through the Habitats Regulations Appraisal.	Noted. The detailed mitigation for this site will be brought forward through the development brief for the site and Inner Moray Firth Local Development Plan.
The community parkland option for the Former Longman Landfill allocation does not come across strongly here.	Noted.
For Muirtown and South Kessock we welcome recognition of the LNR here.	Noted.

In relation to Issue 1 (open space) this score could be neutral or positive (+) rather than negative if the necessary safeguards were included in the policy.	
Policies 9 (Stratton Lodge) and 12 (Stratton Farm) Reference to the Inner Moray Firth SPA should be carried across to the Proposed Plan – this needs to be addressed within the Habitats Regulations Appraisal of the Plan.	Noted. The HRA of the plan has addressed this issue.
The assessment for Ashton Farm as part of this allocation should also include reference to proximity to the Inner Moray Firth SPA and Ramsar, Moray Firth SAC and Longman & Castle	Noted.
Stuart Bays SSSI and hence also be included in the HRA of the Plan. There is no reference under Ashton to green networks and this should be rectified – a need to link to the green network both within the site and linking to the wider green network around the site.	Noted. This will be brought forward through the Inner Moray Firth Local Development Plan.
The assessment for Land between Beechwood and Ashton Holdings as part of this allocation discounts the nearby European sites and SSSI. However this site as part of the Stratton allocation should be considered within the individual and cumulative assessment under the HRA of the Plan.	Noted. The HRA of the plan has addressed this issue.
The assessment for Milton of Culloden Smallholdings as part of this allocation notes proximity to European sites and protected species, but omits to note the need to comply with green network principles both within the site and linking to the wider green network. This is however included in the overall policy in the plan for Stratton.	Noted. Detail of the detailed mitigation for this site will be brought forward through the Inner Moray Firth Local Development Plan.
The assessment for Stratton Farm as part of this allocation should include reference to the nearby Inner Moray Firth SPA and Ramsar. This should be considered as part of the HRA of the plan. The mitigation is incomplete when compared to that included in Policy 12 of the plan, e.g. with reference to green networks, a Badger Protection Plan, other protected species survey and mitigation plans. There is a need to include reference to the Inner Moray Firth	Noted The HRA of the plan is under preparation. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan.
SPA and Ramsar (for which an HRA is needed) and avoid reference to contributing to Inverness-Nairn Coastal Trail pending the outcome of the HRA.	Noted. Contribution to the Coastal Trail is a priority of delivering the green network therefore it is specifically mentioned. The HRA work for the Plan and the Coastal Trail are currently in production.
Policy 10 (Beechwood Campus) There is no reference in the mitigation to protected species surveys or compliance with green network principles.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in

These should be added (although they are included in the plan policy). There is a need to include reference to the Inner Moray Firth SPA and Ramsar (which should be included in the HRA of the plan).	the plan.
Policy 11 (Inverness Retail and Business Park) There is no reference as such to green networks – as mentioned this is because this SEA Objective is not being picked up by this assessment – however green networks are referred to in the plan policy itself.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan.
Policy 14 (Whiteness) It is unclear how this detailed site assessment relates to the consideration and approval of the current outline approval for residential development here.	Noted. The outline consent condition 1 gives detail on what will be considered at a detailed stage and therefore there is scope for the mitigation identified in the site assessment to be considered and brought forward in and Matters Specified in Conditions application. The detailed mitigation will be brought forward through the Inner Moray Firth Local Development Plan.
A negative effect is identified on adjacent European and national nature conservation designations, and it is blandly stated that 'suitable mitigation measures may be required to ensure the allocation does not negatively affect these designations'. This need to be assessed further as part of the HRA for the plan.	Noted. The HRA of the plan is under preparation.
With reference to Issue 25 (landform), this could be negatively affected by this policy. Whiteness Head SSSI includes the shingle spit immediately north east of this allocation. This spit is likely to be affected if the channel into the harbour is dredged.	Noted.
Policy 13 (Tornagrain) Proximity to Loch Flemington SPA should be added – to be considered as part of the HRA of the plan. The mitigation does not refer to the area of Ancient and Long Established Woodland, nor to a design framework for landscape character, both of which are included in the plan policy.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan.
Issue 18 states that protected species may be present and also states that badgers are present. Badgers are protected species. Therefore it should read that there are protected species within the allocation area.	Noted. This error will be corrected in the final version of the ER.
Policy 20 (Croy Expansion) This has omitted reference to Kildrummie Kames SSSI and Loch Flemington SPA, with suitable developer requirements and inclusion as part of the HRA of the plan. Also there is no reference to complying with green network principles within the site and linking to the wider green network, although this is included in the plan policy.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan. The HRA of the plan is under preparation.

Policy 21 (Culloden Moor) There is no reference to complying with green network principles within the site and linking to the wider green network. However this is included in the plan policy itself. This seems particularly relevant here given the existing land cover appears to be woodland.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan.
With reference to Issue 18 it is important to note that there are protected species in this location, including badgers.	Noted.
Policy 22 (Ardersier Expansion) Reference to 'due consideration [being] given to the potential impact on the Moray Firth SAC' should be taken forward as part of the HRA of the plan	Noted. The HRA of the Plan is under preparation.
Policy 23 (Cawdor) There is no reference to green networks. However this is included in the plan policy itself. Reference to the need for protected species survey should be expanded to include mitigation plans if necessary. The reference to Cawdor Wood SAC and a Recreational Management Plan should be taken forward as part of the HRA of the plan.	Noted. The developer requirements in the plan have been informed by the SEA and as such the additional mitigation has been set out in the plan. The HRA of the plan is under preparation.
Policy 16 (Sandown) The developer requirements identified as mitigation in the SEA are not translated across to the policy in the plan, and we recommend this is done. This includes the need for a protected species survey and mitigation plan, and open space provision in line with supplementary guidance. The SEA refers to 'due consideration [being] given to the proximity of the Moray Firth SAC and Whiteness Head SSSI', and to this should be added the Inner Moray Firth SPA. Such consideration should be carried out now as part of the HRA of the plan, both individually and in combination. There is no reference in the SEA developer requirements to complying with green network principles within the site and linking to the wider green network. This should also be added to the developer requirements in the plan policy.	Noted. The mitigation identified in the SEA will be brought forward through the development brief for the site and the Inner Moray Firth Local Development Plan. The HRA of the plan is under preparation.
Issue 18 - there are protected species present within this site – badgers.	Noted.
Policy 17 (Delnies) The SEA refers to 'due consideration [being] given to the proximity of the Moray Firth SAC and Whiteness Head SSSI', and to this should be added the Inner Moray Firth SPA and Ramsar. Such consideration should be carried out now as part of the HRA of the plan, both individually and in combination. With reference to issue 18 we are not aware of any great crested newts within this allocation. However other protected species are present, including bats and badgers.	Noted the HRA of the plan has addressed this issue.
Policy 15 (Lochloy) It is unclear why developer requirements have been identified for this site in the SEA when the plan policy indicates the site	Noted. The detail and mitigation will be brought forward through the Inner Moray Firth Local Development Plan.

<p>already has planning permission and provides no developer requirements. If developer requirements can be added to the policy, then as well as those listed should be bullet points relating to protected species, green networks and proximity to international and national designated areas (Moray and Nairn Coast SPA, Moray Firth SAC and Culbin Sands, Culbin Forest and Findhorn Bay SSSI). Please refer to comments regarding HRA of the plan.</p>	
<p>Policy 24 (Nigg) Developer requirements are identified in this assessment but are not transposed into the plan policy, presumably because there is already a masterplan for this site. Perhaps it would have been more useful to assess the masterplan against these criteria and identify any further mitigation measures that should be included in the plan policy. The area of ancient/seminatural woodland and protected species hasn't been picked up (though picked up by the masterplan). The 'due consideration' to the proximity of European sites should be addressed in the HRA of the plan.</p>	<p>Noted. The HRA of the plan is under preparation.</p>
<p>Policies 26 (John O' Groats), 27 (Castletown) and 28 (Dounreay) Here again developer requirements have been identified but the policy simply refers to adoption of a masterplan. Have these factors been duly taken forward in the masterplan, or should they be added as additional developer requirements in the policy? For John O' Groats the adjacent SSSI is a fossil fish site in the hard rock of the intertidal zone, and so tourism effects on this SSSI are unlikely, although the impact on the nearby SPA should still be monitored.</p>	<p>Noted. The mitigation identified will be considerations in the masterplanning process.</p>
<p>For Castletown the allocation intrudes into the Dunnet Links SSSI at the NE corner. Recreational impacts are possible here, and we have advised in our response to the Proposed Plan that the SSSI should be omitted from the allocation.</p>	<p>Noted. This has been taken forward as an outstanding issue to examination.</p>
<p>Policy 71 (Waste management facilities) We note the developer requirements identified through this assessment have not been taken across into the plan policy, and would assume they should be.</p>	<p>Noted. The mitigation will be brought forward through the appropriate area local development plan.</p>

<p>Alternative sites We have not considered these in any detail at this stage, but would highlight the following sites where there are key issues needing further consideration and discussion with us should they be considered further as part of the preparation of the Inner Moray Firth LDP – Brahan Farm, Maryburgh – adjacent to the Conon Islands SAC and Lower River Conon SSSI. Please note that this site is not adjacent to the Moray Firth SAC. East of Croy – proximity to Loch Flemington SPA and Kildrummie Kames SSSI (consideration should be both individually and in combination).</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>
<p>Drum Farm, Nairn - proximity to Moray and Nairn Coast SPA, Moray Firth SAC and Culbin Sands, Culbin Forest and Findhorn Bay SSSI (consideration should be both individually and in combination).</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>
<p>Flemington – close proximity to Loch Flemington SPA and Kildrummie Kames SSSI (consideration should be both individually and in combination).</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>
<p>Balloch Farm, Inverness – individual and cumulative effects on European sites and protected species (including badgers) in terms of overall development in the A96 Corridor area and in particular the Inverness East area. There is a typo under issue 17 where SAC is used once rather than SPA.</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>
<p>Achnareidh, Nairn – cumulative effect on Inner Moray Firth SPA and Whiteness Head SSSI.</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>
<p>Fairways, Inverness – individual and cumulative effect on protected species, especially badgers.</p>	<p>Noted. As mentioned in the Environmental Report these will be given further consideration at the Interim Environmental Report stage of the relevant area local development plan.</p>

Reasons for choosing the Highland-wide Local Development Plan as Adopted, in the light of other reasonable alternatives

The Highland-wide Local Development Plan has the potential to ensure a positive impact on the environment as it contains measures which will ensure it can meet the Strategic Environmental Assessment Objectives.

While it was not considered an option to not produce the Highland-wide Local Development Plan, there were a number of alternative approaches to policies and proposals within the plan. In the case of these alternatives, the option which was most environmentally sensitive while also balancing other competing needs such as sustainable economic growth (albeit outwith the scope of the SEA process) was brought forward.

The Highland area varies hugely, however the approach to planning on certain key policy aspects as covered by the Highland-wide Local Development Plan needs to be consistent. To deliver this the Highland-wide Local Development Plan contains all planning policies which will be applicable at a Highland-wide level. The local detail and any specific local policies will be brought forward through the area Local Development Plans, the first of which, the Inner Moray Firth Local Development Plan is currently at Main Issues Report Stage.

The main focus of this Strategic Environmental Assessment has been on the future development of Highland, however it should be recognised that while the policies of the Highland-wide Local Development Plan can not and will not be applied retrospectively they may have a positive effect on existing developments and communities wider than the site which is under consideration.

A number of related plans, policies and strategies were identified and have been used to better the content of the adopted Highland-wide Local Development Plan.

Measures that are to be taken to monitor significant environmental effects of the implementation of the Highland-wide Local Development Plan

Section 19 of the Environmental Assessment (Scotland) Act 2005 requires the Responsible Authority to monitor significant environmental effects of the implementation of the Highland-wide Local Development Plan. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action.

It is considered good practice for monitoring:

- fit a pre-defined purpose, help to solve problems, and address key issues;
- is practical and is customised to the PPS;
- is transparent and readily accessible to the public;
- is seen as a learning process and a cyclical process relating closely to the collation of the environmental baseline.

For this monitoring to be effective it will need to be linked to both the SEA Objectives and the Plan Objectives. The baseline data set out earlier in this report sets the scene for any monitoring which is to take place. Below is a monitoring framework. As part of the Action Programme for the Highland-wide Local Development Plan we will publish a fuller framework for monitoring of the plan. However, the table below only considers indicators relevant to the state of the environment.

Note: Items highlighted in grey are longer items which we seek to monitor as and when resources become available.

SEA Topic	What the plan seeks to achieve	Monitoring Indicator	Responsible for Data Collation	Publication of Monitoring	Remedial Action
Air	No increase in number of Air Quality Management Areas	Number of Air Quality Management Areas	THC (Environmental Health)	Biennially	Review policy and site allocations in areas where AQMA have been designated.
Water Quality	Improve Water Quality	Number of designated bathing areas	SEPA	Annually	Review policy and site allocations in Local Development Plan(s).
		Number of rivers "C" classification or below			
		Number of bathing areas passing bathing water quality			
		% of planning applications granted in last 12 months which connected to public water/sewer			
	Reduce instances of flooding	Number of planning applications granted within medium to high flood risk areas (1 in 200yr probability)	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
	Increase number of developments incorporating water efficient technologies	Number of schemes that incorporate water efficient technologies	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
Soil	Remediation of Contaminated Land and redevelopment of brownfield sites	Number of planning applications granted on brownfield land in the last 12 months	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
	Reduction in the area of prime agricultural	Number of planning applications granted	THC (Information and Research)	Annually	Review policy and site allocations in

	land developed	on prime agricultural land (1, 2, 3.1 of the Macaulay Institute Classification)			Local Development Plan(s).
Biodiversity	Protection and enhancement of biodiversity in Highland	Number of applications granted within SPA, SAC, Ramsar, NNR, SSSI, Sites of Local Nature Conservation.	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
	Protected Species are not significantly disturbed	Number of applications which require a protected species survey	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
Climatic Factors	Reduction in Travel	% travelling to work/study by car	THC (Information and Research)	Biennially	Review policy and site allocations in Local Development Plan(s).
		% travelling to work/study by public transport	THC (Information and Research)	Biennially	Review policy and site allocations in Local Development Plan(s).
		% travelling to work/study by active travel	THC (Information and Research)	Biennially	Review policy and site allocations in Local Development Plan(s).
Human Health	Improve accessibility to open space	Provision of open space (m ²)	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
		% of households within 1200m of open space	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
Cultural Heritage	Reduce number of	Number of buildings	THC (Information and	Annually	Review policy and

	buildings at risk	at risk	Research)		site allocations in Local Development Plan(s).
Landscape	Impact on quality of landscape	Number of planning applications granted within NSA and SLA in last 12 months	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
Material Assets	Improved accessibility to recycling facilities	% of households within 15km of recycling centre	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
		Number of planning applications granted which include provision for recycling point in last 12 months	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
	Reduction in waste going to landfill	% of total residual waste in Highland going to landfill	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).
	Protection and enhancement of public access	Number of planning applications granted which affect path identified in the core path plan	THC (Information and Research facilitated by access officers)	Annually	Review policy and site allocations in Local Development Plan(s).
	Increase number of developments incorporating sustainable materials	Number of schemes that incorporate sustainable materials	THC (Information and Research)	Annually	Review policy and site allocations in Local Development Plan(s).

Conclusion

It is considered that the Strategic Environmental Assessment of the Highland-wide Local Development plan has added significant value to the plan making process by ensuring the local development plan gives due consideration to environmental objectives and works with other plans, programmes or strategies to maintain, enhance and protect the environment. The SEA has led to the consideration and inclusion of a number of key developer requirements in the plan which will ensure that negative effects of development are offset and positive effects are maximised.