

Appendix 1 – Responses to Comments on the Environmental Report (April 2012) and the Environmental Report Addendum (May 2013)

This appendix sets out how comments on the Environmental Report have helped to shape the Revised Environmental Report

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Comments on the Environmental Report (April 2012)

Historic Scotland

Comment	Response
<p>I have reviewed the Environmental Report on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. It therefore focuses on the environmental assessment, rather than the contents of the guidance. Our comments on the Main Issues Report itself will form part of the Scottish Government's response to the Council. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the MIR.</p> <p>I welcome that the comments we provided on the Scoping Report on 7 March 2011 have been taken into account during the preparation of the Environmental Report. I also welcome the continuing engagement throughout the development of the Main Issues Report (MIR) and its assessment.</p> <p>The Environmental Report represents a detailed assessment focused mainly on the site appraisal of the spatial strategy. I am content to agree with the findings of the majority of these assessments but note that a number of</p>	<p><i>Comments are noted and through the preparation of the Revised Environmental Report will be addressed.</i></p> <p><i>With regard to the suggested monitoring indicators, it is considered that these would fit with the approach to monitoring which we are seeking to bring forward and as such we will bring these forward in the Monitoring Section of the Revised Environmental Report.</i></p>

<p>small number of the site assessments have not identified potential effects on the historic environment. Given the important role played by the assessment in identifying and suggesting mitigation for potential effects it is key that this information is accurate in order for the assessment to influence the final decision making regarding the spatial strategy and its method of delivery. I have therefore included details on these omissions in an annex to this response.</p> <p>As noted above, our response to the MIR through the Scottish Government focuses on the spatial strategy and I would refer you to those comments with regard to the mitigation of effects. For the most part these comments are in line with the findings of the assessment. However, it is important that the site assessment influences not only site selection but site delivery. In this regard the mitigation suggested by the assessment should be brought forward into the Proposed Plan through developer requirements for the delivery of each site. To this end I would suggest that the link between the assessment and the spatial strategy is clearer within the delivery advice accompanying the spatial strategy at the next stage.</p> <p>I note that the monitoring indicator for the cultural heritage relates to reducing the number of buildings at risk. While this is to be welcomed you may wish to consider additional monitoring indicators that report on both those effects on the historic environment predicted in the assessment as well as the overall effects of the plan on this resource. In this regard I welcome the conjoined approach with the Highland Wide LDP but would suggest that effects on the historic environment through the implementation of the Inner Moray Firth spatial strategy are monitored</p>	
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through the inclusion of a monitoring indicator such as “the number and outcome of planning applications where scheduled monuments are significantly affected”.	
<p>Inverness C2 Reference should be made to the need to consider the setting of the adjacent scheduled Caledonian Canal.</p> <p>Inverness H49 (Misprinted as H48 within Appendix 5) While noting the proximity of Leys Castle and its designed landscape the assessment omits the adjacent scheduled monument Druid Temple Farm, chambered cairn and stone circle 230m WSW of (Index no. 2417) in close proximity to northern boundary of allocation.</p> <p>Inverness H55 The assessment should have considered the impact on the scheduled monument Ashton Farm Cottages, ring ditch 415m SW and pit circles 460m WSW of (Index no. 11535).</p> <p>Castle Stuart MU1 The assessment has not identified or considered that the western section of this allocation contains the scheduled monument Newton of Petty, settlement 350m WNW of (Index no.11835).</p> <p>Cromarty H1, C5 These site are wholly within the Cromarty House Inventory Designed</p>	<p><i>All of the issues raised will be addressed in the Revised Environmental Report.</i></p>

Landscape	
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Scottish Environment Protection Agency

Comment	Response
We have used our scoping consultation response to consider the adequacy of the ER. We agree with the findings of SEA and welcome the clear way in which the SEA recommendations for further mitigation have been set out. In our response to the Inner Moray Firth Local Development Plan Main Issue Response we have enclosed a spreadsheet. Within this spreadsheet there is a column which highlighted where mitigation identified in the SEA has not been brought forward into the Main Issues Report. Much of this mitigation would be required to remove our objections relating to flood risk. This highlights the importance of the SEA and the role it has in informing your choices regarding allocations.	<i>Noted. These comments will be addressed through the preparation of the Proposed Local Development Plan</i>
As the Inner Moray Firth Local Development Plan is finalised, 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	<i>Noted.</i>

<p>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.</p>	
<p>We note that in the table in Appendix 2, under Water/Water Quality in Protected Areas there is a link to SEPA's 2006 water quality classification, and one to general classification page. These are pre-Water Framework Directive and both links are now redundant. The link to the most up to date classification is www.sepa.org.uk/water/river_basin_planning/classification_results_2010.aspx. In addition our River Basin Management Plan interactive map: http://gis.sepa.org.uk/rbmp/ shows the 2008 classifications along with details of the pressures/measures for each waterbody.</p>	<p><i>This will be revised and brought forward in an updated Appendix 2 to the Revised Environmental Report with the information informing any revised assessments as part of this document.</i></p>

Scottish Natural Heritage

Response	Comment
<p>This is a very comprehensive and thorough piece of work, and we would commend you for how environmental information collected at the Call for Sites stage has been able to inform the SEA.</p> <p>We have provided detailed comments in the Annex to this letter. Some of the key themes coming out of these comments are as follows –</p>	<p><i>Noted.</i></p>
<p>– In most cases the possible presence of protected species has not been specifically addressed, but instead reference is made to the need for a protected species survey at the application stage. Rather than assessing this as a ‘neutral’ effect on the environment, more realistically we believe the effect is ‘unknown’. The importance of a satisfactory mitigation or protection plan where protected species are present should be added, to avoid the plan having negative environmental effects</p>	<p><i>Noted. This will be addressed in the Revised Environmental Report</i></p>
<p>– We advise that in the case of badgers, cumulative assessment should be given further consideration. The cumulative assessment part of this SEA could we suggest be strengthened by focussing on a few key issues arising from the site-by site assessments, especially badgers and ancient/long established/semi-natural woodland</p>	<p><i>Noted. It is considered that the cumulative assessment looking at the overall cumulative impact of a range of development scenarios on the SEA Objectives is considered appropriate due to the scale of the plan. We will consider this revised approach for any future SEA.</i></p>

<p>– The threshold between a ‘minimal’ and a ‘significant’ negative effect could be reviewed, especially in terms of woodland. The scale of impact on inventoried woodland did not appear to make a difference to ‘minimal’ scores. Also some negative impacts on woodland and green networks appeared to be offset in the assessment by suggested mitigation (e.g. open space provision or woodland management plans), whereas the Council’s methodology is stated as assuming no mitigation</p>	<p><i>Noted. Due to the stage of the plan and the SEA, at this stage we feel it would be difficult to review the scoring system and the scoring thresholds but we will consider making the distinction clearer for future SEA work.</i></p> <p><i>The use of mitigation to offset impacts of sites prior to the assessment of the site was an error and these will be revisited.</i></p>
<p>- Linking SEA at this stage with Habitats Regulations Appraisal (HRA) is very important, so we would wish to see likely significant effects on European sites in terms of the Habitats Regulations mirrored in the SEA. This would be useful as a part of the early work on the HRA. In addition potential cumulative effects on European sites can be flagged up early within the cumulative assessment part of this SEA. Some examples of these are noted in the annex.</p>	<p><i>Noted. We consider this approach to be best practice and one which we will take forward in future SEA work. While this is the case the HRA has been twin tracked (as far as practicably possible) with the SEA to aid integration.</i></p>
<p>– Perhaps for the Revised Environmental Report, in the main part of the text, consideration could be given to a short piece of text for each of the site allocations in the Proposed Plan explaining if the SEA identified any significant negative environmental effects, and if so, what mitigation is included in the plan to reduce or offset this.</p>	<p><i>Noted. A section will be included in the RER on the significant negative environmental effects and how they are mitigated through the plan.</i></p>
<p>Relationship with other PPS and environmental protection objectives (pp17-61) Table 2 – Scotland Planning Documents – Please add reference to “Green Infrastructure: Design and Placemaking” document – http://www.scotland.gov.uk/Publications/2011/11/04140525/0</p>	<p><i>Noted. These will be included and given due consideration in the Revised Environmental Report.</i></p>

<p>Also add Policy on Control of Woodland Removal and associated guidance – http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Infrastructure/Energy-Consents/Guidance/Woodland-removal</p> <p>http://www.forestry.gov.uk/pdf/WRpolicyguidance17March2010.pdf/\$FILE/WRpolicyguidance17March2010.pdf</p> <p>Regional Planning Documents – Add Moray Firth Natural Heritage Futures Series (2002 and 2009 update) – http://www.snh.gov.uk/about-snh/what-we-do/nhf/nhf-byla/document/?category_code=NHF&topic_id=1429</p> <p>Add reference to the Council’s Badger Protection Guidance Notes (PGN) - http://www.highland.gov.uk/yourenvironment/planning/developmentplans/developmentplanpolicyguidance/Otherplanningguidance.htm</p>	
<p>Current State of the Environment (pp62-69)</p> <p>Biodiversity, flora and fauna – Badgers should be discussed – see Council’s own Badger PGN Wild deer should be mentioned pp 62-65: this is a list of the UKBAP priority habitats and species – however, can it be made more specific to the plan in question? For example could some discussion focus on any habitats and species of particular note in the plan area (e.g.</p>	<p><i>Noted. The suggested modifications will be made to the Revised Environmental Report for completeness.</i></p>

<p>badger, great crested newt)?</p> <p>??Green networks should be discussed here</p> <p>Soil –</p> <p>Some further information on the location of carbon rich soils can be found on our website –</p> <p>http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soilsrocks-and-minerals/soils-and-development/</p> <p>However there is no discussion here at present about soils in terms of land capability for agriculture (e.g. ‘prime’ land) and this would appear to need to be covered here in the context of this plan area.</p> <p>Water –</p> <p>The designation of the Moray Firth as a Special Area of Conservation (SAC) would merit mention here.</p> <p>Climate Change –</p> <p>Some greater discussion on sea level rising would seem necessary here, given the geography of this plan area.</p> <p>Landscape –</p> <p>The National Scenic Areas wholly or partly in the plan area (e.g. Glen Affric NSA) should be mentioned here.</p> <p>Environmental Problems (pp70-72)</p> <p>Biodiversity, flora, fauna –</p>	
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<p>Suggest also discuss -</p> <ul style="list-style-type: none"> ?? Cumulative impact on badger and wild deer ?? Loss of woodland (ancient/long established/semi-natural) ?? Impact on green networks ?? Indirect effects on designated sites <p>Human health –</p> <p>Suggest also discuss -</p> <ul style="list-style-type: none"> ?? Active travel opportunities <p>Soil –</p> <p>Suggest also discuss -</p> <ul style="list-style-type: none"> ??? Carbon rich soils ?? Good quality land <p>(NB: mitigation column refers to waste rather than soils)</p>	
<p>Likely significant effects (pp74-93)</p> <p>Please see detailed comments below under Appendix 5. We agree that assessment should be carried out assuming no mitigation. So on occasions we have queried where a ‘neutral’ score has been assigned on the assumption of mitigation, suggesting instead the likely significant effect should be identified, followed by mitigation.</p> <p>We wonder if the threshold between a ‘-’ (minimal) and ‘--’ (significant) effect is clear enough. In particular sites that would involve the loss of woodland on the ancient woodland inventory (of whatever scale of magnitude) may be</p>	<p><i>See above comments in response to the issues raised.</i></p>

<p>assigned only a ‘-’ score and so are not considered further than the site specific level. This is despite the protection afforded to such woodland by the Control of Woodland Removal Policy and the Council’s own policy. We suggest consideration is given to a threshold between minimal and significant effect based on whether it is of national or local/regional importance and the size of woodland affected (plus see comment below re cumulative effect).</p> <p>In order that the SEA can provide an initial consideration for the Habitats Regulations Appraisal, we recommend that sites likely to be screened in as having a likely significant effect on European sites are scored here as ‘-’ or ‘- -’.</p>	
<p>Cumulative assessment (pp94-96)</p> <p>It is unclear how cumulative effects can be mitigated on a ‘site by site [basis]’ (pp94-96) – does it not require consideration beyond the individual level? Key cumulative impacts in terms of the natural heritage of this plan are we suggest likely to be on badger and wild deer habitat, loss of ancient/long established/semi-natural woodland, the international designations of the Inner Moray Firth, and on landscape setting around Inverness. See also comments below under Appendix 6.</p>	<p><i>The meaning of the site by site mitigation will be clarified in the Revised Environmental Report. Essentially it is suggesting that the site by site mitigation will also cumulatively have an effect.</i></p> <p><i>See comment above regarding consideration of further issues in terms of the cumulative assessment.</i></p>
<p>Compatibility with other PPS (pp97-98)</p> <p>It is unclear why this section is here – we suggest this is better located when all other PPS are being considered (Table 2).</p>	<p><i>Noted. This section will be moved.</i></p>
<p>Mitigation measures (p99)</p> <p>These should be set out in developer requirements in the Proposed Plan. For</p>	<p><i>Noted.</i></p>

<p>sites requiring assessment through the Habitats Regulations Appraisal, further mitigation is likely to be identified through this process.</p> <p>Where mitigation for biodiversity is stated as a protected species survey, this should be followed by a mitigation/protection plan if protected species are present. This should potentially consider cumulative impact for badgers in the Inverness area.</p> <p>Mitigation for loss of woodland is variously stated as for example 'minimise loss of trees', 'woodland management plan', or 'compensatory planting'. We would welcome greater clarity for this, given that woodland in question includes that in the ancient woodland inventory, which has policy protection elsewhere. For example, in some cases it would seem possible to amend the allocation boundary to exclude the woodland area. Elsewhere where compensatory planting will be required, some parameters for this could be set out, e.g. it should significantly enhance the green network.</p>	<p><i>Where mitigation is suggested in the SEA it will be carried forward to the plan and similar wording to that suggested will be included.</i></p> <p><i>With regard to woodland mitigation. The Plan must be read alongside and considered against all relevant legislation, policy and guidance and any application will be judged against this. While this is the case these will be considered individually to further consider mitigation in the plan process.</i></p>
<p>Monitoring (pp100-103)</p> <p>References to HwLDP should be amended to refer instead to IMFLDP.</p> <p>Biodiversity –</p> <ul style="list-style-type: none"> – Suggest amend monitoring to applications affecting designated areas rather than within them – Protected species monitoring could also include applications granted that require a licence – Planning permissions requiring compensatory tree planting can be added – Applications with green network components secured through masterplan, detailed design layout, developer agreement etc 	<p><i>The suggested wording is welcomed and will be incorporated into the monitoring section of the Revised Environmental Report.</i></p>

<p>Landscape – – Quality of design statements; implementation of design plans; landscaping schemes undertaken</p>	
<p>Appendix 1 – Response to scoping comments No comments (thank you for giving careful consideration and attention to our comments at the scoping stage)</p>	<p><i>Noted.</i></p>
<p>Appendix 2 – Baseline Information Data and maps These are at the pan-Highland level rather than the plan level, so it is important that the most relevant for the Inner Moray Firth area are as comprehensive as possible.</p> <p>Climatic factors – the coherence of the green network could be included here</p> <p>Soils – we suggest reference is added to carbon rich soils – has the Council access to soil data from the James Hutton Institute? Some Scotland-level spatial data is available in SNH Information Note on carbon rich soils – see - http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soilsrocks-and-minerals/soils-and-development/</p> <p>Landscape – the Special Qualities Reports for National Scenic Areas should be referred to as important baseline data for the safeguarding of these areas – http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/nationaldesignations/nsa/special-qualities/</p> <p>The extent of Highland’s Special Landscape Areas should be added here, along with links to their citations.</p>	<p><i>Noted. Where The Council can access the information the Environmental Baseline will be updated and considered in the preparation of the Revised Environmental Report.</i></p>

<p>For wild land, reference can be made both to SNH's Search Areas for Wild Land, and to the more recent map of the presence of qualities of wildness – http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policyand-guidance/wild-land/mapping/</p> <p>Coast – can reference be made here to the coastal classification in the Council's Coastal Development Strategy (i.e. percentage of developed, undeveloped and isolated coast)?</p> <p>Impact of windfarms – SNH's visual indicator of built development and land use change is not just in respect of windfarms, but built development (e.g. includes overhead power lines). If you are able to run similar data yourselves, you may be able to calculate percentage visibility for more accurate baseline and monitoring purposes.</p> <p>Biodiversity – the number and extent of designated sites could be stated for the IMF LDP area rather than for the Highland area as a whole Data source for wider biodiversity is the NBN Gateway - http://data.nbn.org.uk/</p> <p>Green network – reference should be made to spatial data in the Council's Supplementary Guidance</p> <p>Maps – We recommend further maps can be included for – – Local Nature Reserves (listed in contents page but not included) – Special Landscape Areas – Qualities of Wildness (see recent data provided by SNH)</p>	
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– GCR Sites	
Appendix 3 – Alternatives to which SEA was applied No comments (factual – taken from the Main Issues Report)	<i>Noted</i>
<p>Appendix 4 – Vision, Spatial Strategy and Policy Assessments Other Settlements</p> <p>The preferred approach sets out a number of criteria for the consideration of development proposals in the smaller settlements of the plan area. However it is unclear how this also allows for consideration of issues dealt with by policies in the Highland wide LDP. For example there is reference in this preferred approach to possible adverse impact on locally important heritage features, but what about nationally and internationally important heritage features too? Development at Invermoriston for example could affect the River Moriston SAC.</p> <p>It is unclear why the mitigation section of this assessment considers this is a matter for the review of the HwLDP in 2015. Given this is an additional proposed policy in the IMFLDP, any mitigation should be possible in terms of amendments to this emerging policy, e.g. additional criteria to include, or removal of specific settlements from here and inclusion of them instead as more detailed settlements in the plan.</p>	<p><i>Noted. With regard to the application of the policy and how it will work, please see the “Summary of comments and recommended responses” on our website.</i></p> <p><i>The mitigation wording will be revised for accuracy and clarity The revision of the HwDLP is also relevant to this policy due to the overlap of consideration of some of the criteria being covered by policies of the HwLDP as well as the Other Settlements Policy.</i></p>
<p>Housing in the Countryside</p> <p>With regard to the ‘contraction’ option, the area identified for possible contraction (south of Dores to Farr) includes both international (Special Protection Area – Loch Ruthven and Loch Ashie SPAs) and local (Special</p>	<i>Noted. This will be revisited for the Revised Environmental Report. It should however be noted that Housing in the Countryside Policy is primarily concerned with protection of the local landscape character and</i>

<p>Landscape Area – Loch Ness and Duntelchaig SLA) designations. These are not mentioned in the assessment (objectives 1 and 16/17)</p> <p>With regard to the ‘individual hinterland’ options, we wonder whether the ‘neutral’ scoring for all but landscape adequately reflects the possible effects of the greater pressure for dispersed development that this option would open up – for example in relation to habitats and species.</p>	<p><i>issues with regard to impact on the wider environment (including designated sites) is covered by other policies of the HwLDP.</i></p> <p><i>Consideration has been given to the effect of a greater dispersal of development if the individual hinterlands approach was taken forward. However due to the partner policy of the Housing in the Countryside policy (Wider Countryside) still requiring a sequential approach to be followed then it is not considered that it would be either positive or negative in that respect. This will be clarified in the SEA Assessment.</i></p>
<p>Special Landscape Area</p> <p>With regard to the ‘contraction’ option for the Drynahan, Lochindorb and Dava Moors SLA, the Carn nan Tri-tighhearnan area has wildness qualities, and so there may be a negative effect on SEA Objective 18. Also although not landscape-related the area is also designated SSSI and SAC.</p>	<p><i>Noted. This will be revised for the Revised Environmental Report.</i></p>
<p>Appendix 5 - General comments –</p> <p>1. We feel the ‘=’ (neutral) scoring for protected species (Q2) is questionable given the SEA is simply saying that protected species may be present on the sites and that a survey will be required. So given it is unknown at this time, we suggest a ‘?’ (unknown) scoring for Q2 would be more appropriate. But where badger habitats would be affected, or other examples of more likely presence of a protected species (e.g. great crested newt) these could be scored as ‘-’ at least and referred to as such.</p> <p>2. Scoring regarding green networks (Q3) has sometimes countered a loss re</p>	<p><i>Noted. These comments will be addressed where they have been identified through the further detailed comments on Appendix 5.</i></p>

<p>habitat with a potential gain re recreation, so leading to an overall ‘=’ score. This juxtaposes two different functions of the green network, and it is not we suggest appropriate mitigation for important loss of habitat that a path is provided. Also sometimes a ‘+’ (minor positive) score is given to an area presently contributing to the green network because it is anticipated that any development will incorporate GN features and to that extent no mitigation has been deemed necessary (e.g. MU16 Culduthel-Slackbuie, R11 Milton of Leys). This contradicts the opening note that the assessment assumes no mitigation and risks necessary mitigation not being explicitly included in the plan. However on the other hand sometimes such a situation results in a ‘-’ score, which seems correct (e.g. MU28 Stratton) (although mitigation should be added), so there is some inconsistency. Also sometimes for Q3 a ‘=’ score is assigned because existing woodland that would be lost would be replaced in some measure by open space within housing development. However this needs to be considered against the nature of the species currently relying on the woodland for movement as part of the green network.</p> <p>3. The scoring for Q1 re biodiversity sometimes is neutral (‘=’) when woodland in the ancient woodland inventory would be affected. It would seem more appropriate for such environmental effects to result in a ‘-’ score under biodiversity, or even ‘--’ if a certain scale or nature of such woodland would be affected.</p> <p>4. Sometimes the proposed mitigation for negative effects is very general (e.g. “minimise loss”; “necessary mitigation”; “survey work”) and it is unclear how this will influence the extent and nature of any allocation based on this (e.g. Inverness I2 Harbour Extension).</p>	
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<p>5. Sometimes the scoring where there would be a loss of woodland is ‘=’ on the basis of compensatory planting as mitigation. Given the introductory notes to Appendix 5 state that site assessments are carried out assuming no mitigation, then it would be assumed in those cases that there would be a ‘-’ score, followed by mitigation.</p>	
<p>Inverness Preferred/Non-Preferred Sites Croy – MU1 and H3 - re Q1 we advise this should refer to possible connectivity re water quality with Loch Flemington SPA</p> <p>Dores – H1 – re Q1 it is unclear how this is scored ‘=’ when it affects an area of woodland in the Ancient Woodland Inventory. Given the status of ancient woodland in the SPP (para 146) and the Control of Woodland Removal Policy, it would seem more appropriate to score this as ‘--’ based on area affected (6 ha); re Q3, again it is unclear how this is scored as ‘=’ in terms of the green network. Suggested mitigation of open space when this is presently ancient woodland (and hence functions as woodland in the green network) does not seem appropriate.</p> <p>Dores – C1 – re Q12 this site lies within a GCR Site – this has not been picked up here and implies a ‘-’ score at least.</p> <p>Drumnadrochit – H1 and H3 – re Q1 the connectivity with the Urquhart Bay Wood SAC via the River Enrick should be noted and considered as part of the HRA of the plan (potential hydrological impacts on the qualifying features) although not likely to be significant</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

<p>Drumnadrochit – H4 (also H6, although this is a non-preferred site) – re Q1 and Q3 this does not note that these areas are indicated as involving the loss of semi-natural woodland. This should affect the current ‘=’ scores for Q1 and Q3.</p> <p>Fort Augustus – re Q1 and Q3, MU2 and B1 are indicated as including semi-natural woodland</p> <p>Kiltarlity – H3 and B1 – re Q1, this notes the presence on the site of semi-natural woodland and scores ‘-’, but the proposed mitigation is then stated as minimising the loss of long-established woodland. It is unclear how this will be achieved. Re Q3 (green network), as with other questions this is scored ‘=’ even though woodland would be affected, so this is unclear – as is the proposed mitigation of creating open space in substitution for woodland.</p> <p>Kirkhill – H5 - re Q1 and Q3 – this area is included within the Ancient Woodland Inventory (category 2b – LEPO) - so implies a ‘-’ rather than a ‘=’ scoring (re Q3).</p> <p>Tomatin – H2 and H3 – re Q1 and Q3, these areas are within the Ancient Woodland Inventory (category 2b – LEPO) – see comments above re scoring and mitigation H6, H7 and MU3 (or MU4: map and text differ) – re Q1 and Q3 – as before see earlier comments for a site which is contained presently within the Ancient Woodland Inventory (category 2b – LEPO) – it is very unclear why a ‘=’ score is given when the proposed mitigation is compensatory planting. The introductory notes say that all site assessments have been carried out assuming no mitigation. Mitigation for any negative effect on the green</p>	
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<p>network partly depends on the location of any compensatory planting.</p> <p>Inverness Airport Business Park – B1 – Q1 and Q3 acknowledges presence on site of woodland in the Ancient Woodland Inventory (category 2b – LEPO) and the need for appropriate mitigation; Q2 – badger habitat, so ‘-’ scoring more appropriate</p> <p>Tornagrain – MU1 – Q1 and Q3 – re woodland in Ancient Woodland Inventory on site (category 2b – LEPO), this would suggest a ‘-’ rather than a ‘=’ scoring; Proximity to Loch Flemington SPA and Kildrummie Kames SSSI should be recognised under Q1. Q2 – badger habitat, therefore a ‘-’ scoring is we suggest more appropriate</p> <p>Travellers Sites T1 and T2 at Dalcross – re Q1 it is unclear how no impact on the nearby Inner Moray Firth SPA is concluded, given the possible nature of use of the site. A ‘-’ scoring would seem more appropriate. However for the part of the T2 site at Seafeld of Culloden the proximity to the Inner Moray Firth SPA (adjacent at this stage) and the nature of possible usage would indicate a ‘- -’ scoring.</p> <p>Castle Stuart – MU1 - re Q1 it is unclear how no negative impact on the nearby SPA is concluded given the possible increase in recreational activity near the shore in combination with the proposed Coastal Trail – a ‘- -’ score would seem more appropriate at this stage. Re Q32 it is unclear how it has been concluded that there would be no impact on landscape character given the present openness of the site and location between the road/railway and the Moray Firth</p>	
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<p>Whiteness – MU1 – re Q1 it is noted that this is in close proximity to SPA, SSSI and SAC to the north, and woodland on/to the south of the site, so it is unclear why this is given a ‘=’ scoring rather than a ‘-’ scoring, given that the assessment assumes no mitigation.</p> <p>I1 – re Q1 the site is partly within the SPA, SSSI, GCR site and SAC. It is therefore very unclear why this has been assigned a ‘=’ score. Also the justification states that it is assumed that a business (renewables related) activity here would have no negative effect on the European designations, but the reasoning behind this is unclear. Re Q9 (open space) this is scored ‘++’ on the basis that additional open space may be provided by this development, but given its proposed industrial zoning for heavy renewables-related work, this seems very unlikely – similarly for Q32 re landscape where a ‘+’ score is given because “the uses proposed for the site are likely to increase enjoyment of the surrounding landscape by creating opportunities for recreational use”. This is unclear – how will an N-RIP site create opportunities for recreation? And how is this relevant to landscape character?</p> <p>Inverness – H2 Craig Phadrig – re Q1 this area is indicated as within the Ancient Woodland Inventory (category 2b – LEPO), so ‘=’ score is unclear.</p> <p>H20 South Kessock – re Q1 it would appear as though the site is within the Merkinch LNR boundary, so the ‘=’ scoring here is unclear.</p> <p>H47 Milton of Leys – this appears to be a duplicate of H45-46 Balvonie of Inshes</p>	
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<p>in the appendix;</p> <p>H49 (Welltown of Easter Leys) (p557) – again this appears to be headed incorrectly (H48 Milton of Leys Neighbourhood Centre) – however re Q1 from a desk analysis the southern part of the area of scrub/woodland is mixed woodland, so the ‘=’ score here may need adjusting.</p> <p>H71 (S of B9006 at Woodside of Culloden) – re Q1 from a desk analysis this area of scrub/woodland is semi-natural woodland, so the ‘=’ score here may need adjusting</p> <p>H74c (Nairnside) – re Q1 from a desk analysis semi-natural woodland should be considered</p> <p>MU16 Culduthel/Slackbuie – re Q32 this says ‘May have significant impact upon local landscape’ and yet is scored ‘=’; from the text it would be assumed this would have a ‘-’ score.</p> <p>MU20 and MU21 Longman landfill area – re Q1 as well as proximity to SAC note also presence of semi-natural woodland on some of the site, accentuating the ‘-’ scores for these two sites on biodiversity grounds.</p> <p>MU30 Milton of Culloden and MU31 Balloch – re Q32 (landscape) it is noted here that “Site may have a significant impact on landscape, highly visible from A96(T)” or “Site may have a significant impact on landscape and result in coalescence of separate communities” but they are scored ‘=’. A ‘-’ score for both these sites seems to be implied from the text.</p>	
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<p>B6 Milton of Leys – re Q1 from a desk analysis western-most part includes an area of seminatural scrub/woodland</p> <p>B8 University Campus – re Q1 the proximity to the Inner Moray Firth SPA should be referred to here as well as the Moray Firth SAC</p> <p>B9 Retail and Business Park – re Q1 please note shoreline is SPA as well as SSSI, so potential HRA issue, although business rather than housing use is relevant.</p> <p>I1 Carse – this appears to have been omitted from the tables - re Q1 the Merkinch LNR lies adjacent to the site and it is in proximity to the Moray Firth SAC</p> <p>I4 Longman Landfill – re Q1 the presence of semi-natural woodland on this site as well as the close proximity to international designations should be noted here; re Q32 it is unclear how a ‘=’ score has been assigned here and a conclusion re unlikely adverse impact on local landscape given proposed use, especially given possible “taller structures” noted in the text, in the light of the Inverness District LCA (‘sense of openness and exposure’) and the Inner Moray Firth LCA (‘natural coastline and landscape between industrial areas [helps] to act as visual and physical buffer areas’). A ‘-’ score would seem more appropriate</p> <p>T2 Old A96 – re Q1 the adjacency to the SPA/SSSI combined with the possible use would point to a ‘- -’ rather than a ‘-’ score; re Q32 there may be a negative impact on key views from the railway line across the Moray Firth</p>	
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<p>R6 Inverness East – re Q3 on green networks, this has been narrowly assessed against the greenspace audit rather than more widely assessed against green networks as per the supplementary guidance.</p> <p>C13 Ashton Farm and C14 North of Culloden Academy – re Q1 the proximity to the Inner Moray Firth SPA/Ramsar site should be considered here, especially if these possible recreational areas have links to the proposed Coastal Trail</p>	
<p>Nairn Preferred/Non-Preferred Sites -</p> <p>MU1 Delnies – re Q1 reference should be added to the proximity to the Inner Moray Firth SPA. Recommend scoring is ‘-’ so that mitigation of Recreational Access Management Plan follows on from this. Re Q32 (landscape), given it is noted in the text that there would be a material change in landscape character, it is unclear why this has been assigned an ‘=’ score. A ‘-’ score would seem more appropriate, with mitigation then set out as per for example the Inner Moray Firth and Moray & Nairn LCAs.</p> <p>MU2 Sandown – as above re Q1 and Q32</p> <p>MU4 Nairn South – as above re Q32 (within the Coastal Farmlands LCA per the Moray & Nairn LCA – see under ‘Urban Expansion’ on p71)</p> <p>MU5 Nairn South (later phase) and MU6 (Househill) – re Q32 these are answered differently to</p> <p>MU4 which seems inconsistent – it is recommended that the approach for MU4</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

<p>is also used for MU5 and MU6</p> <p>H1 Fort Reay – re Q1 this should also refer to the Inner Moray Firth SPA/Ramsar. Also reference should be made here to site including semi-natural woodland. This we suggest points to ‘-’ rather than ‘=’ score. We recommend mitigation should be added re the woodland. Re Q9 this refers to this being a mixed use development whereas it is a housing development. However it is hoped that the Council’s Open Space in New Residential Areas Policy applies to both Housing and Mixed Use Allocations. Re Q32 see above under MU1</p> <p>H2 Achareidh – re Q1 this should also refer to the Inner Moray Firth SPA/Ramsar. Also reference should be made here to parts of the site being mixed woodland. This we suggest points to ‘-’ rather than ‘=’ score. We recommend mitigation should be added re the woodland. Re Q2 a protected species survey may also be needed for bats and red squirrels. Re Q9 see comments under H1.</p> <p>H4 West of Firthside – re Q1 the Tree Preservation Order noted in the MIR is not discussed here. Re Q32 we suggest there is a need to consider any views over the site from the road and from the popular path on either side</p> <p>H6 Lochloy – re Q1 the proximity to the Moray and Nairn Coast SPA should be referred to here.</p> <p>H7 Kingsteps – this has been omitted – under Q1 needs consideration of proximity to Moray and Nairn Coast SPA</p>	
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<p>Cawdor – MU1 – re Q1 the proximity to Cawdor Wood SAC has not been picked up here, nor the requirement as set out in HwLDP for a Recreational Management Plan – this should be reflected here</p> <p>B1 – re Q1 this should reflect the area of woodland in the SE part of the site which is seminatural woodland</p>	
<p>Ross and Cromarty East Preferred/Non-Preferred Sites - Alness – H10 Coulhill – re Q1 it is stated that this is cleared woodland, but in other questions (Q4, Q24, Q32) it is stated that this is within woodland. So it is unclear whether woodland would be affected by any development here. This is an area included in the Ancient Woodland Inventory (category 2b – long established of plantation origin)</p> <p>Avoch – Site B2 (harbour) does not appear to have been assessed. Re Q1 this is likely to need consideration with regard to proximity to the Moray Firth SAC, subject to anticipated activity</p> <p>I1 - re Q1 this is scored '±' in terms of no anticipated effect on the nearby Moray Firth SAC, but this should also be included in the HRA.</p> <p>Barbaraville – H1 – re Q1 this is scored '±' in terms of no anticipated effect on the nearby Cromarty Firth SPA, but this should also be considered as part of the HRA. In</p>	<p><i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i></p>

<p>particular given Q4 has been answered ‘+’ (enjoyment related to the natural heritage) this is rather contradictory to Q1 because it implies possible increased recreational activity close to the SPA</p> <p>Maryburgh – MU3 – re Q1 this should note and assess the proximity to the Conon Islands SAC/Lower River Conon SSSI</p> <p>Conon Bridge – MU2 – re Q1 this notes the proximity to the Conon Islands SAC/Lower River Conon SSSI and scores it ‘=’ in view of mitigation; given introductory note to Appendix 5 we suggest the preferred procedure would be to score it ‘-’ and then apply mitigation as a result of an identified likely significant effect</p> <p>Contin – H5 – re Q1 as well as proximity to the SAC/SSSI from a desk analysis this site may also contain a small area of semi-natural woodland</p> <p>Cromarty – H5 and H6 and C8 – re Q1 the proximity to the Rosemarkie to Shandwick Coast SSSI should also be noted</p> <p>H7 – this appears to be missing</p> <p>Culbokie – H6 – re Q1 given this is in Culbokie Wood (part of Ancient Woodland Inventory – category 2b - LEPO) it is unclear why this has been assigned a ‘=’ rather than a</p>	
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<p>'-' score</p> <p>Dingwall – MU3 – re Q1 it is unclear what 'woodland management plan' means in the context of mitigation for the woodland on this site.</p> <p>Evanton – H8/I6 Newton Road – re Q1 from a desk analysis this should consider the semi-natural woodland presently on the site, which may lead to a '-' score</p> <p>I1 Industrial Estate – re Q2 this is scored '=' but given it is stated in the text that protected species are known to occur on this site, it would seem to be more appropriate to assign this a '-' score (as for I4)</p> <p>Fortrose/Rosemarkie – H4, H5, MU2 and MU3 – re Q32/33 it is suggested that as well as impact on SLA the '-' score should note the location of these sites in open land between Fortrose and Rosemarkie (see 'Significant Cons' text in MIR itself)</p> <p>C1 does not appear to have been assessed</p> <p>Invergordon – I5 North of Service Base and I6 Service Base – re Q1 given locations partly within the Cromarty Firth SPA/Ramsar/SSSI a '-' rather than '-' score would seem to be justified (given that the '-' score is used elsewhere when sites are close to a designated area – e.g. I7 Delnies). Depending on the nature of the possible development here, it is unclear what 'management plan' means in</p>	
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<p>terms of mitigation for all of I5, I6 and I7</p> <p>Kildary – B4 – re Q1, if a tourism/leisure use is proposed, possible indirect effect on Morangie Forest SPA should also be noted here (as well as Pitmaduthy Moss SAC)</p> <p>Muir of Ord – H6 Ardnagrask – re Q1 this identifies this area is mixed woodland but assigns it ‘=’ rather than ‘-’. Furthermore no mitigation is included. H9 Chapelton West – re Q32 it is unclear why this is ‘=’ rather than ‘-’ given from a desk analysis semi-natural woodland is present on site. MU3 Tore Road North – re Q1 this should also consider the presence of semi-natural woodland on the site. Re Q2 (species) we recommend this should be scored ‘- -’ (great crested newt) rather than ‘=’ in this case</p> <p>I1 – re Q1 the expansion area to the east includes some plantation/mixed woodland, which should be noted here</p> <p>North Kessock – B1, H1, H2, H3 – re Q32 (landscape) this is assessed simply in terms of landscape designations rather than also wider landscape character and visual impact issues, which we suggest are likely to be relevant for this settlement opposite Inverness and overlooking the Beaully Firth</p> <p>Munlochy – H6 – re Q1 the proximity to the Inner Moray Firth SPA and Munlochy Bay SSSI</p>	
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<p>should be noted and considered here. Re Q12 (geodiversity) the site is partly within the Munlochy Valley GCR Site and so we recommend should accordingly be scored at least ‘-’, given possible housing use</p> <p>MU1 - re Q1 the proximity to the Inner Moray Firth SPA and Munlochy Bay SSSI should be noted and considered here.</p> <p>Seaboard – H8 – re Q1 given the slight overlap with the Rosemarkie to Shandwick Coast SSSI it is suggested this should be scored ‘-’ rather than ‘=’</p> <p>Strathpeffer – H2 – re Q2 (species) given proximity to Loch Kinellan this should be scored ‘- -’ with suitable mitigation then considered H3 does not appear to have been assessed</p> <p>Tain – B1 and I1 – re Q1 and proximity to SAC/SPA/Ramsar/SSSI, the mitigation is likely to relate more to pollution and noise than to recreation, given potential use of site for business/industry rather than residential</p> <p>Tore – I1 – re Q1 this assessment has not considered the presence over the southern (E-W) part of the site of woodland in the Ancient Woodland Inventory (category 2b – LEPO); and in terms of Q3 (green networks) the mitigation (open space provision) seems unrealistic given that this is zoned for industrial rather than residential use</p>	
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<p>Nigg – I1 – re Q1 a small part of the site at the SE corner lies within the Rosemarkie to Shandwick Coast SSSI</p> <p>Fearn Aerodrome – MU1 and B1 – re Q1 this has not taken account of the connectivity with Loch Eye SPA, which requires consideration as part of the HRA of the plan. Re Q2 this notes the possible presence of protected species but offers no mitigation (e.g. protected species surveys and mitigation plans)</p> <p>Fendorn – MU1 and I1 – re Q1 as well as being in close proximity to the Dornoch Firth and Morrich More SAC and Dornoch Firth and Loch Fleet SPA, it is also close to the Loch Eye SPA – all this needs to be assessed as part of the HRA of the plan. Re Q2 this notes the possible presence of protected species but offers no mitigation (e.g. protected species surveys and mitigation plans)</p>	
<p>Appendix 6: Cumulative Assessment This is a very generic assessment, taking a broad overview of overall development scenarios across the plan area of 100%, 60% or 30% of site take-up. Perhaps instead for your consideration a table could be prepared by SEA Objective of all sites with ‘-’, ‘- -’, ‘+’ and ‘++’ scores, to see whether these would have a synergistic impact either because the SEA resource is limited in extent or in distribution. The concentration for example of significant negative impacts on protected species (specifically badgers) around Inverness would indicate a synergistic impact which requires a strategic rather than a case-by-</p>	<p><i>See comment above on this issue.</i></p>

<p>case mitigation response. (Having said that, Policy 58 of HwLDP regarding Protected Species does refer to both individual and cumulative impacts). Also perhaps the potential loss of ancient, long established and semi-natural woodland across the plan area can be calculated as a percentage of the whole resource to consider its cumulative significance. For landscape, perhaps the cumulative assessment could be on the basis of Landscape Character Types, and whether a level of development in an area would affect their distinctive and recognisable pattern. As the tables state, for development affecting European sites, cumulative (in-combination) effects must be considered as part of the Habitats Regulations Appraisal.</p>	
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Comments on the Environmental Report Addendum (May 2013)

Historic Scotland

Comment	Response
<p>I have reviewed the addendum on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. My focus in reviewing the addendum is on the potential for significant environmental impacts on the historic environment that may arise from these additional sites.</p> <p>I welcome the detailed assessment that has been carried out on the additional sites and alternatives that have been identified following your consultation on the Main Issues Report. I am content to agree with the findings of the assessment and welcome the identification of mitigation to be brought forward through developer requirements for each individual site. Of the assessments of the sites I would wish to offer the following comment.</p>	<p><i>Noted.</i></p>
<p>Tain NS28</p> <p>We would suggest that any housing development in this area should consider the setting of the scheduled monument (and Category B listed building) St Duthus Chapel and request that the developer requirements attached to the site note that consideration needs to be given to the</p>	<p>Noted. This will be revised in the Revised Environmental Report.</p>

setting of this site.	
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Scottish Environment Protection Agency

Comment	Response
We generally agree with the findings of SEA and welcome the clear way in which the SEA recommendations for further mitigation have been set out. In our response to the Inner Moray Firth Local Development Plan Main Issue Response (MIR) we have enclosed a spreadsheet. Within this spreadsheet there is a column which highlighted where mitigation is identified in the SEA. As the sites were not part of the MIR is not clear whether mitigation identified in the SEA will be brought forward into the Proposed Plan. Much of this mitigation would be required to ensure we did not object to the Proposed Plan. This again highlights the importance of the SEA and the role it has in informing your choices regarding allocations.	<i>Noted. The SEA site assessments included in this addendum will form part of the Revised Environmental Report and will influence the content of the Proposed Plan</i>
As the Inner Moray Firth Local Development Plan is finalised, 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	<i>Noted</i>

SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.	
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Scottish Natural Heritage

Comment	Response
Once again we would commend you for the thoroughness of the site assessments, which involve 36 questions relating to the SEA Objectives. We trust this will prove useful to you in identifying the development factors and developer requirements that should be included for preferred allocations in the Proposed Plan. Our detailed comments are provided in the Annex to this letter. On a more general level, some of the points still seem to apply now on which we commented at the time of the Environmental Report for the MIR –	<i>Noted.</i>
1. Where a site would affect woodland that is ancient, semi-natural or long established which is included in the Ancient Woodland Inventory, we consider this should be assessed as a significant negative effect (-) rather than a minimal negative effect (-), given the strong protection afforded to such woodland by Scottish Planning Policy and the Control of Woodland Removal Policy.	Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.

2. No cumulative assessment has been carried out in this Addendum, but it is stated that an updated cumulative assessment will be carried out when the Revised Environmental Report is prepared to accompany the Proposed Plan. We recommend that this updated cumulative assessment should consider certain targeted cumulative effects, such as impact on badgers around Inverness (noting that a further site south of Inverness is now proposed for inclusion in the Proposed Plan).	Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.
3. Likely effects on protected species are assessed as neutral (=) in all cases because a protected species survey and protection plan if required will be requested as relevant. At this stage it would be more accurate to assess the effect on protected species of allocating sites as 'Unknown' (?) rather than Neutral, bearing in mind that this SEA assumes no mitigation. It will be important that protected species surveys and protection plans are required whenever there is a likelihood of protected species being affected, in order to avoid eventual possible adverse effects.	Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.
4. Where a site is Preferred despite there being significant negative effects, it would be very helpful if a short 'Commentary' paragraph was included after the matrix, to explain the selection. Also in such cases it is important that the mitigation to be included in the Proposed Plan is fully set out. One example from these additional sites is Strathpeffer NS2 – Kinellan Mid.	Noted. As per our response to these issues at the Environmental Report Stage above we will take these actions into consideration.
8.8.3 – 2nd bullet point - it is noted that suggested changes of use from say industrial to residential have not been subject to SEA. However depending on location this may have a significant	Noted. While this was not the case through the alternative sites consultation

environmental effect if a Natura site sensitive to recreational disturbance is close by, e.g. a Special Protection Area.	it has been carried out for the Revised Environmental Report.
8.8.3 – 3rd bullet point - here it says that suggested expansions to Hinterland and SLA boundaries have been subject to SEA, but not possible contractions. However section 10 of this ER Addendum does include assessment of contractions as well as expansions. This latter approach seems better, since both expansion and contraction of designated/policy areas could have significant environmental effects.	Noted. This was a typographical error.
8.9.1 – we would suggest the following sites (preferred or non-preferred) would also have significantly negative environmental effects in terms of SEA Objective 1 (biodiversity) because of apparent impact on Inventoried Ancient Woodland – – Drumnadrochit NS14 – Blairbeg – Invergordon NS18 – House of Rosskeen	Noted. This will be revisited in the Revised Environmental Report.
It would be useful if an extra column was added to note the mitigation that will be included in the LDP for those sites listed which are preferred (e.g. Strathpeffer NS2).	The mitigation section will contain all mitigation which may be used in the Proposed Plan. However, where the mitigation is covered by general policies of the IMF LDP or the HwLDP then these may not be included. It is not considered proportionate to have a further column detailing which mitigation will be included in the plan.
There appear to be a couple of typing errors – – Conon Bridge NS56 – relevant SEA Objective is 25 (active travel), not 14 (peatland) – Alness NS132 – relevant SEA Objective is 21 (flooding), not 12 (geodiversity)	Noted. These will be revised.

8.10.1 – here it is noted that an updated cumulative assessment will be carried out at the Revised Environmental Report stage accompanying the Proposed Plan. We recommend this should consider certain targeted cumulative effects. For example there are further sites around Inverness within these Alternative Sites which affect badger habitat, so have potential effects both individually and in combination.	Noted. Please see our response to this issue as raised in the SNH response to the Environmental Report.
<p>Beauly NS133 – House of Beauly – for protected species a 'Neutral' (=) score has been given, although a protected species survey and possible mitigation plan is noted. As we commented for the previous ER, we suggest an 'Uncertain' (?) score would be more appropriate in such cases, given that this SEA assumes no mitigation. (NB: This comment applies to all other sites, but not repeated there)</p> <p>Beauly NS25 – Wellhouse – for Q12, this site is adjacent to the Barnyards GCR Site</p> <p>Drumnadrochit NS14 – Blairbeg – given that some of the woodland here appears to be within the Ancient Woodland Inventory (Type 2b – long established, of plantation origin), a ' - ' score (significant negative) would seem to be more appropriate.</p> <p>Inverness NS19 – Drumossie Hotel – re Q2 a badger survey in particular should be noted (We assume this assessment also covers site NS19B)</p> <p>Inverness NS37 – Simpsons Garden Centre - re Q2 a badger survey</p>	<i>Noted. These issues will be revisited and revised in the Revised Environmental Report.</i>

<p>in particular should be noted; re Q4 a negative effect has been noted re the green network but mitigation has been filled in as 'N/A' – some mitigation measure would be helpful here (e.g. retention of hedge/tree line alongside the A9); re Q11 the site is greenfield but has been scored as '=' rather than '-'</p> <p>Inverness NS41 – Birchwood, Inshes – re Q1 this has not picked up on the semi-natural woodland covering this area, so a '-' score would seem more appropriate; re Q3 given that the commentary says development of this site would significantly affect the green network, a '-' score would seem more appropriate here (in addition the suggested mitigation of open spaces does not seem comparable to the existing belt of mature woodland); re Q11 the site is greenfield but has been scored as '=' rather than '-'; re Qs 32 and 33 these have been scored as negative because of the removal of large areas of woodland, but no mitigation is offered (although is this because this is a non-preferred site?)</p> <p>Cawdor NS1 – re Q1 the site appears to include woodland, so it is unclear why the score is '=' rather than '-'; re Q2 if the site contains woodland a protected species survey and mitigation plan if necessary should be required; re Q3 given that there will be some impact on the green network, a '-' score would seem more appropriate than an '=' (neutral) score; re Q11 given that this site is part brownfield and part greenfield a '+/-' score would seem more appropriate</p> <p>Nairn NS4 – Househill – re Q1 the '=' score seems to overlook (a) the presence of woodland across some of the site, and (b) the connectivity with nearby SPAs at the coast re recreational activity – a</p>	
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<p>‘-’ score would therefore seem more appropriate; re Q2 the existence of seminatural woodland points to a protected species survey and mitigation plan as necessary being required; re Q3 given that a likely effect on the green network because of impact on woodland is noted, a ‘-’ score would appear more appropriate (especially as the SEA scoring assumes no mitigation – retention of trees to provide links throughout the site to link the river corridor to woodland to the east should be considered for mitigation); re Q11 given much of the site is greenfield a ‘+/-’ score would seem more appropriate</p> <p>Alness NS107 – Dalmore Distillery – re Q11 since the site is both brownfield and greenfield a ‘+/-’ score would appear more appropriate; although the proposed use of the site is Industrial, some of the questions are answered as if the intended use was Residential</p> <p>Alness NS108 – Teaninich Distillery - re Q11 since the site is both brownfield and greenfield a ‘+/-’ score would appear more appropriate</p> <p>Alness NS131 – Averon Way - re Q11 since the site is both brownfield and greenfield a ‘+/-’ score would appear more appropriate</p> <p>Alness NS132 – Alness Point Business Park - re Q11 since the site is both brownfield and greenfield a ‘+/-’ score would appear more appropriate</p> <p>Conon Bridge NS11 – N of Windsor Place – re Q1 nearby designated sites are Conon Islands SAC, Lower River Conon SSSI and Cromarty Firth SPA/Ramsar; re Q11 given the site is greenfield a ‘-’ score would be anticipated</p>	
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<p>Conon Bridge NS56 – Droughy Duck lands – re Q1 Conon Islands is an SAC rather than an SPA; re Q2 if there may be protected species on the site, a protected species survey and mitigation plan if necessary should be required</p> <p>Conon Bridge NS12 – B9163/A835 Junction - re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Contin NS111 – adjacent to ‘Torridon’ – re Q1 this notes the presence of woodland on the Ancient Woodland Inventory (Type 2a – ancient, of semi-natural origin) on the site and therefore scores it ‘-’ (significant negative). We agree with this, although we query the suggested mitigation of compensatory planting, given the strong protection for ancient seminatural woodland in SPP and CoWRP; re Q3 it is noted that there would be a likely effect on the green network given the presence of woodland here, and so a ‘-’ rather than a ‘=’ score would be anticipated (we would also query the provision of open space as mitigation for an effect on a green network that comprises woodland); re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q32 given it is noted that development here would result in the removal of valued landscape features a ‘-’ or even a ‘- -’ score would be anticipated</p> <p>Cromarty NS58 – South of Manse (1) – re Q1 the semi-natural woodland adjacent to the site could be considered (e.g. mitigation in terms of buffer distance); re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q32 general sensitive landscape impact on the edge of the settlement could be considered (e.g. mitigation in</p>	
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<p>terms of landscape planting)</p> <p>Cromarty NS59 – South of Manse (2) – re Q3 given this notes some impact on the existing green network (albeit with a requirement for open space) a ‘=’ rather than a ‘+’ score would be anticipated; re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q13 (soils) this is scored differently to the above site which is the adjacent field, so perhaps a need to check this (it is noted as prime land under ‘Cons’); re Q32 it is not clear if the general sensitive landscape impact on the edge of the settlement has been considered</p> <p>Dingwall NS15 – S of Craig Road – re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Cromarty Firth SPA/Ramsar site; re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Dingwall NS20 – East of Eastend Wood - re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Cromarty Firth SPA/Ramsar site; re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q13 given that it is noted that a large part of the site is prime land a ‘-’ rather than ‘=’ score would be anticipated</p> <p>Evanton NS113 – NE of Drummond Farm – re Q1 connectivity to the Cromarty Firth SPA/Ramsar/SSSI via a minor road for potential recreational access could be noted (and would require screening re Habitats Regulations Appraisal if a preferred site); re Q11 given the site is greenfield a ‘-’ score would be anticipated</p>	
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<p>Fortrose NS47 – W of Caravan Park - re Q1 this would require screening re Habitats Regulations Appraisal if a preferred site, because of proximity to the Moray Firth SAC; re Q3 given a negative effect has been identified for the green network, some mitigation would be anticipated (retention of open corridors within the site?); re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Fortrose NS129 – Ness Gap – re Q1 this site appears to be zoned for retail, and so this will have a bearing re the HRA of this site for relative proximity to the Moray Firth SAC; re Q3 given a negative effect has been identified for the green network, some mitigation would be anticipated (retention of open corridors within the site?); re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Invergordon NS18 – House of Rosskeen – re Q1, given that a large part of the site is indicated as included in the Ancient Woodland Inventory (Type 1b – long established of plantation origin) we suggest a ‘-’ score would be more appropriate; re Q11 given the site is largely greenfield we suggest a ‘+/-’ score would be more appropriate</p> <p>Muir of Ord NS22 – Ardnagrask – re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Muir of Ord NS46 – Tomich House – re Q1 this has not picked up on the semi-natural woodland that is present across part of the site; re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Muir of Ord NS130 – Glen Ord Distillery – no further comments (welcome reference re Q2 to possible presence of great-crested newts)</p>	
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<p>and bats)</p> <p>Munlochy NS121 – Land E of B1 – re Q1 the site is in relative proximity to Munlochy Bay SSSI and Inner Moray Firth SPA/Ramsar and connectivity is possible via drainage (bearing in mind proposed Business use) – this should be noted here and would require screening re Habitats Regulations Appraisal if a preferred site; re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q32 this notes a significant landscape impact as it is a very prominent site outside the settlement, so it is unclear why this is scored ‘=’ rather than ‘-’ or even ‘- -’</p> <p>North Kessock NS122 – Bellfield – re Q11 given the site is part greenfield and part developed we suggest a ‘+/-’ score would be more appropriate</p> <p>Seaboard NS91 – Cadboll Farm - re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Strathpeffer NS16 – N of former railway station - re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Strathpeffer NS2 – Kinellan Mid – re Q2 we would advise this is strengthened to require a protected species survey and mitigation plan, particularly with regard to Slavonian grebe and Great crested newt; re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Tain NS23 – Glenmorangie Distillery – re Q1 and proximity to Dornoch</p>	
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<p>Firth and Loch Fleet SPA and Dornoch Firth and Morrich More SAC, given the allocation would be Business/Industrial (expansion of the distillery), a recreational access management plan would not be relevant – instead the Habitats Regulations Appraisal should consider any likely effect re any pollution or water run-off; re Q11 given the undeveloped part of the site is greenfield a ‘-’ score would be anticipated; re Q13 given that it is noted that the undeveloped part of the site is prime land, a ‘-’ score would be anticipated; re Q32 we agree the ‘-’ score because of the open aspect of the area, its adjacency to the A9 and Far North Railway Line and being next to the Dornoch Firth NSA. We agree that landscape and visual mitigation will be important, and with regard to the NSA reference should be made to its special qualities (e.g. “the tranquillity of an undeveloped coastline”)</p> <p>Tain NS28 – Kirksheaf - re Q11 given the site is greenfield a ‘-’ score would be anticipated Tain NS71 – S (actually W) of A9 – re Q1 the relative proximity to Morangie Forest SPA (capercaillie being the qualifying feature) should also be noted here, with connectivity for recreation appearing to be possible via a track to the south; re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q13 given the site is noted here as prime land a ‘-’ score would be anticipated</p> <p>Tore NS127 – Ryefield - re Q11 given the site is greenfield a ‘-’ score would be anticipated</p> <p>Tore NS128 – Grain Mill extension - re Q11 given the site is greenfield a ‘-’ score would be anticipated; re Q32 given this notes the visual prominence of the site and its sensitivity by the A9, a ‘-’ score would</p>	
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<p>be anticipated (although it is noted that mitigation has nevertheless been set out in the form of a landscaping and tree planting plan)</p> <p>Expansion of SLAs – re Q18 (wildness) this could be assessed in comparison to the recent map of Core Areas of Wild Land, or the broader map of relative wildness</p> <p>Contraction of SLAs – re Qs 16 and 17 (landscape), although these have been assessed as negative, in this case the areas suggested for removal from the SLA are within the Cairngorms National Park, and so will still receive recognition for their landscape quality through National Park policies. Therefore we suggest these can also be scored ‘=’ (neutral effect)</p> <p>Expansion of Hinterland – re para 10.10.2 we assume there is a typographical error, since Qs 16 and 17 (landscape) are scored ‘+’ for this option, but this commentary paragraph refers to a slight negative effect</p>	
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Other Comments Received

Comment	Response
As the agent for Mr McBean the landowner of site NS 58, we attach comments on inconsistencies between the SEA's which have been prepared for Mr McBeans (a preferred site NS58), and an adjacent site NS59 (non preferred) site.	<i>Noted. These will be addressed in the Revised Environmental Report</i>

<p>9.8.1 SITE ASSESSMENT DRUMNNADRICHT NS14 BLAIRBEG</p> <p>The following responses are offered to the comments in the assessment document. 1 – 3. Some loss will occur but the No. of Plots has been reduced. Plot 1 has the fewest trees. Medium value trees (4 in all) are located on the boundary edges of Plots 1 and 3. Apart from 2 medium/low value trees on the roadside boundary of Plot3 all the rest are low value or recommended for removal. Refer to Tree Survey. 5 See 7.10.1 for comments on roads. 9 Little used by public owing to existing old walls impeding access. Most activity is on the north and west side of the wood. There is one informal route crossing SW corner of Plot 3. See 10 below and last year's submission. 10 Little used informal route can easily be moved 3-4 meters and a proper safe gap in the boundary wall rather than the existing access created by the simple expedient of knocking the top of the wall down. 32 Majority of wood will be retained and kept as such with, hopefully, management and regeneration if all or most comes to pass. The area of potential low density private development is on the far, south, side of the village away from it. The visual aspect from the village will not be altered. The landscape will remain the same. The above relates to para 7.10.1. Drumnadrochit NS14 Blairbeg</p>	<p><i>Noted. Much of the issues raised here would be mitigation of any negative affects of the proposed allocation.</i></p>
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