Issue 90	sue 90 Appendices and Proposals Map					
Development plar reference:		es 6.1 to 6.4 (Chap es 128 – 160) and Map	oters 24	Repo	rter:	
Body or person(s) submitting a representation raising the issue (including reference number)						
Coriolis Energy LLP (1), Health and Safety Executive (HSE) (53), Scottish Natural Heritage (SNH), (118), Highlands and Islands Green Party (HIGP) (168, 533), Strutt & Parker LLP for Balnagown Castle Properties Ltd (229), Turley Associates for Sainsbury's Supermarket's Ltd (267), Jones Lang LaSalle for Scottish and Southern Energy Plc and its Group Companies (SSE) (268), Homes for Scotland (293), CASA Planning and Environment Ltd for Cube Engineering (449), Jones Lang Lasalle for Spittal Hill Windfarms Ltd (450), Jones Lang LaSalle for PI Renewables (454), Biggart Baillie for Nanclach Ltd (457), Jones Lang LaSalle on behalf of Wind Energy (Glenmorie) Ltd (462), Strutt and Parker for AWG Laing (480),Strutt & Parker LLP for General & Mrs Balfour (481)						
Provision of the to which the issue	Appendices 6.1, 6.2, 6.3, 6.4 Proposals Map Policy 58 Natural, Built and Cultural Heritage and supporting text (para 21.2 – 21.2.2) (pages 103-105)					
Council's summary of the representation(s):						
Appendix 6.1: Glossary – the following changes should be made to the glossary:						
<ul> <li>The definition for Appropriate Assessment should be amended to read, "An assessment required under the Conservation (Natural Habitats, &amp;c.) Regulations 1994 (as amended) where a plan or project not directly connected with or necessary to the management of a European site would be likely to have a significant effect on such a site, either alone or in combination with other plans or projects. In the light of the conservation objectives of the site, the assessment should consider whether there would be any adverse effect on the integrity of the site as a result of the plan or project." (118)</li> <li>Definition for green networks is incomplete when compared with that</li> </ul>						
<ul> <li>included in the Green Networks SG. It should be augmented with, "A green network can be made up of –</li> <li>• Woodlands</li> <li>• Other natural and semi-natural habitats</li> <li>• Watercourses and wetlands</li> <li>• Formal and informal greenspace in and around settlements, and</li> </ul>						
<ul> <li>Active travel routes" (118)</li> <li>Definition for infrastructure should include green infrastructure e.g. landscaping, green networks, open space, paths. (118)</li> <li>It may be clearer to use terms included in the explanation in Appendix 6.2 when defining Wild Land. Definition should be amended to read, "Wildness: a quality that can be experienced where there is a high degree of naturalness and lack of modern structures or land use, where an area is remote and access to it is physically challenging,</li> </ul>						

where there is a perceived sense of sanctuary or solitude, and where the landscape offers a sense of awe/ anxiety and arresting qualities. Wild Area: a term used to describe an area of wildness qualities that may occur along a wide spectrum, from places fairly near to settlement but within which there are qualities of remoteness and naturalness, to more remote mountain and moorland interiors. Wild Land: those areas where wildness qualities are best expressed, defined by the Scottish Government as 'uninhabited and often relatively inaccessible countryside where the influence of human activity on the character and quality of the environment has been minimal." (118)

• Glossary should include definitions of Network of Centres, Commercial Centres and sequential approach. (267)

- SPA should refer to the most up to date legislation and should be amended to read, "Classified by Scottish Ministers under either the EC Wild Birds Directive (79/409/EC) or the European Birds Directive (2009/147/EC), which provides for ...." (118)
- Ramsar Sites should not include reference to Structure Plan Policies in Policy Framework. (118)
- NNR should be amended to reflect the new wording of Scottish Planning Policy (SPP): "These areas are protected by national policy in that the integrity of the area or the qualities for which it has been designated should not be adversely affected'. (118)
- SSSIs should be amended to reflect the new wording of SPP: "These areas are protected by national policy in that the integrity of the area or the qualities for which it has been designated should not be adversely affected'. (118)
- NSAs should be amended to reflect the new wording of SPP: "These areas are protected by national policy in that the integrity of the area or the qualities for which it has been designated should not be adversely affected'. (118)
- NSA: Include reference to NSA Special Qualities report, "http://www.snh.gov.uk/protecting-scotlands-nature/protectedareas/nationaldesignations/nsa/special-qualities/ (118)
- There are no entries for battlefields or designated wrecks. (118)
- Special Landscape Areas Link should be added to Special landscape areas citations (118)
- Wild Areas second paragraph requires amending to clarify the role of SNH at a national level and Highland Council's Contribution to this. Reword this paragraph to, "As part of a national programme, SNH will map wildness qualities across Scotland and will identify areas of Wild Land at a national level (in consultation with Highland Council and other Councils). Highland Council, with the assistance of SNH, will then identify wild areas of local/ regional importance to reflect the quality and value of wild areas at a local/ regional level." (118)
- Sites of Local Nature Conservation Interest should be amended to Local Nature Conservation Sites. (118)
- Development Plans should provide clear guidance on what will or will not be permitted and where. SPP notes that this should be very clear

from the proposals map. This policy requirement of SPP sits uncomfortably with the statement in Appendix 6.2 in that there may be features listed within Appendix 6.2 which have not yet been mapped but will still be subject to protection under policy. It is inappropriate for certain features to be protected via policy when such features are not mapped. It is recognised that it would however be difficult to map certain features such as category C and B listed buildings. (268, 454)

- As the assessment of Special Landscape Areas (SLAs) is of a very limited scope, using it to assess the impact of developments on a SLA is not an appropriate use of the document. The wording of the middle column of the first row of the table should be changed so that the role of the Assessment of Highland Special Landscape Area Citations (AHSLA) is clear to readers of the plan. (480, 481)
- The title of Special Landscape Area should be changed to Local Landscape Area to reflect the guidance in SPP. (480, 481)

- There is a large amount of policy information contained within Supplementary Guidance that is out of date and cannot be relied on. Furthermore, the Local Development Plan does not give consistent policy direction. Two examples of the disconnect between existing Supplementary Guidance and this Proposed Plan can be seen from the Councils Open Space Supplementary Guidance as well as the Education Supplementary Guidance, which states that further updates will be provided in the Local Development Plan (LDP). This information does not appear to have come forward through this Proposed Plan.
- There must be appropriate connection between Supplementary Guidance and the LDP. Circular 1/2010 paragraph 94 states that Supplementary Guidance (SG) should: Cover topics specifically identified in the local development plan (LDP) as being topics for Supplementary Guidance. Be limited to the provision of further information or detail in respect of policies or proposals set out in the LDP.
- Homes for Scotland agree that it is the intention of Scottish Ministers to put much of the detail in the Supplementary Guidance, allowing the plans themselves to focus on vision, the spatial strategy, overarching and other key policies and proposals. However, it is critical that the main principles are established in the LDP and SG is used for further information or detail in respect of policies set out in the LDP. As it stands The Highland Wide Local Development Plan - Proposed Plan, does not achieve the correct balance. (293)
- Key pieces of Supplementary Guidance should be included in the Accompanying Documents List in paragraph 1.1, specifically Onshore Wind Energy Supplementary Guidance and Assessment and Landscape Sensitivity to Wind Turbine Development in the Highlands. Omissions from this list should be clearly identified and their location and status cross-referenced. (449)
- The Assessment and Landscape Sensitivity to Wind Turbine Development in the Highlands should be added to the list of Supplementary Guidance in appendix 6.3. (449)

• Welcome the Council's plan to update and make statutory all guidance associated with the HwLDP. This is fundamental to the sustainability agenda. The provision for Homezones and effective sustainable housing design guidance are particularly essential in this context (168, 533)

## Appendix 6.4

- Link to Birds of Conservation Concern should be amended to, <u>http://www.bto.org/bbs/2009/bocc3.pdf</u> (118)
- Add link to Guidance of Significance of the impacts on Birds outwith Designated areas, <u>http://www.snh.gov.uk/planning-and-</u> <u>development/renewable-energy/onshorewind/</u> (118)
- Add link to Control of Woodland Policy, www.forestry.gov.uk/pdf/fcfc125.pdf/\$FILE/fcfc125.pdf. (118)
- Amend link for Scottish Biodiversity list, <u>http://www.scotland.gov.uk/Topics/Environment/Wildlife-Habitats/16118/Biodiversitylist</u> (118)

## Proposals Map

- Include in notes on proposals map that up to date information on the location of SAC, SPA, SSSI and NSA can be found on SNH's website. <u>http://www.snh.gov.uk/planning-and-development/advice-for-planners-</u> <u>anddevelopers/protected-areas/</u> (118)
- Make clear that where more than one natural, built or cultural heritage feature occurs for an area, only the topmost tier feature will be indicated on this map. Therefore other features may nest underneath this, which should also be taken into account. (118)
- It isn't possible to see the SAC rivers or some of the smaller SSSIs (e.g. the fossil quarries in Caithness) due to the low resolution of the map. A note should be added to this effect, directing users of the paper version to SNH's website for more detailed maps (see above). If the Proposals Map is also to be an e-map that can be enlarged online, we recommend that it should be possible to increase the resolution so that users can zoom in and see these small/thin sites. Also the line that shows the coast is too thick and obscures some of the coastal strip SSSIs. Therefore we recommend that the coastal line be thinner so these SSSIs are visible. (118)
- All of the inset maps and maps of settlements should show background features to make the plan more spatial. (118)
- The proposals map falls significantly short of identifying individual features other than providing broad zoning on the basis of where features of international, national and local/regional importance may lie. Clarification should be provided within the Plan that the proposals map represents a very high level illustration of where such features may lie and that it will be treated accordingly in decision making. It is too broad brush to guide investment and development decisions. (268, 454)
- To include Tree Preservation Orders (TPO) under features of national importance is inappropriate as it is confirmed under Council powers and should be of local/regional importance. All of the other features are either confirmed or designated by a national body. (268)

- Clear and precise mapping should be available at a scale which enables readers to accurately identify the boundaries of all proposed land allocations and designations so the Plan can be effectively implemented and appropriately used. (480, 481)
- The proposals map contradicts the spatial strategy maps particularly the Inner Moray Firth spatial strategy map (figure 3) which indicates a proposed waste facility at Invergordon however it is not identified on the Proposals Map as a "New Waste Management Site". (229)
- Object to the key shown on the Proposals Map. It would appear to be policy 58 not policy 59 that relates to areas of international, national and local/regional importance. Policy 71 should be shown on the key relating to waste management. (229)
- It is difficult to distinguish between local and regional features and the spatial policy feature "wider countryside" due to the scale of the map. The determination of a development proposal within or close to Local and Regional Important features should be based on the effect that the development will have on the individual features as set out within 21.1.2 instead of the proposal's policy feature as detailed by the Proposals Map. (1)
- Within certain areas it is not clear what criteria is present on site to merit Local and Regional Importance. It may be the case that these areas have been defined on the basis of other map based information held by the Council and if this is the case the 'Background Maps' need to be made available within the final LDP. (1)
- Major hazards and pipelines should be identified on maps accompanying the plan. (53)
- The policy requirement of SPP paragraphs 14-17 is inconsistent with the statement in appendix 6.2 and paragraph 21.1.10 in that there may be features listed which have not yet been mapped but still be subject to protection under policy; this is inappropriate. The proposals map falls significantly short of identifying individual features. (462, 450, 457)

#### Modifications sought by those submitting representations: Appendix 6.1: Glossary

- Amend the definition of appropriate assessment. (118)
- Augment definition of green networks. (118)
- Definition for infrastructure should include green infrastructure. (118)
- Amend Wild Land definition. (118)
- Include definitions of Network of Centres, Commercial Centres and sequential approach. (267)

- Text amended to reflect up to date legislation. (118)
- Ramsar sites: remove reference to Structure Plan policies in the policy framework. (118)
- NNR background text to be amended. (118)
- SSSI background text to be amended. (118)
- NSA background text to be amended. (118)
- Include reference to NSA Special Qualities report. (118)

- Include entries for battlefields and designated wrecks. (118)
- Add link to Special Landscape Areas citations. (118)
- Reword paragraph 2 of the wild areas background text. (118)
- Sites of Local Nature Conservation Interest should be amended to Local Nature Conservation Sites. (118)
- All features that are sought to be protected under policy 58 should be mapped. (268) (454)
- TPOs should be listed as a regional/local feature. (268)
- The wording of the middle column of the first row of the table should be changed so that the role of the Assessment of Highland Special Landscape Area Citations (AHSLA) is clear to readers of the plan. (480, 481)
- The title of Special Landscape Area should be changed to Local Landscape Area to reflect the guidance in SPP. (480, 481)

## Appendix 6.3

- The key policy guidance contained in the following Supplementary Guidance must be included within the Local Development Plan: Affordable Housing; Education and New Residential Development; Open Space in New Residential Development; A96 Corridor Developer Contributions; Developer Contributions; and Residential Layout and Design (293)
- Key pieces of supplementary guidance should be listed in paragraph 1.1 (449)
- Assessment of Landscape Sensitivity to Wind Turbine Development in the Highlands should be added to the list in appendix 6.3. (449)

## Appendix 6.4

- Link to Birds of Conservation Concern should be amended to, <u>http://www.bto.org/bbs/2009/bocc3.pdf (118)</u>
- Add link to Guidance of Significance of the impacts on Birds outwith Designated areas, <u>http://www.snh.gov.uk/planning-and-development/renewable-energy/onshorewind/</u> (118)
- Add link to Control of Woodland Policy, www.forestry.gov.uk/pdf/fcfc125.pdf/\$FILE/fcfc125.pdf. (118)
- Amend link for Scottish Biodiversity list, <u>http://www.scotland.gov.uk/Topics/Environment/Wildlife-</u> <u>Habitats/16118/Biodiversitylist</u> (118)

## Proposals Map

- Include in notes on proposals map that up to date information on the location of SAC, SPA, SSSI and NSA can be found on SNH's website. <u>http://www.snh.gov.uk/planning-and-development/advice-for-plannersanddevelopers/protected-areas/</u> (118)
- Make clear that only the topmost tier feature will be indicated on this map. (118)
- A note should be added directing users of the paper map to the SNH website for more detailed maps. If the Proposals map is to be an emap it should be increased in resolution. Coastal line should be thinner. (118)

- Inset maps and settlement maps should show background features. (118)
- Clarification should be provided within the Plan that the proposals map represents a very high level illustration of where such features may lie and that it will be treated accordingly in decision making. It should be indicated whether this will be taken forward through SG or whether more detailed LDPs will seek to provide more detailed mapping. It should be made clear where more detailed information can be found. (268, 454)
- Clear and precise mapping should be available. (480, 481)
- Ensure Proposals Map does not contradict Spatial Strategy maps. (229)
- Policy 59 should be amended to read Policy 58. (229)
- Policy 71 should be shown on the key relating to waste management.
   (229)
- Needs to be clearer differentiation on the map between local and regional features and the spatial policy feature "wider countryside". (1)
- Background maps for individual features as mentioned in para 21.1.9 to be made available. (1)
- Major hazards and pipelines should be identified on maps accompanying the plan. (53)

# Summary of responses (including reasons) by Planning Authority:

Appendix 6.1: Glossary

- The Council would support any Reporter recommended change to amend the definition for Appropriate Assessment.
- The Council would support any Reporter recommended change to augment the green networks definition.
- The Council would support any Reporter recommended change to amend the definition of "infrastructure" in the glossary to include "green infrastructure, e.g. landscaping, green networks, open spaces, paths.
- Whilst the extra definitions in the glossary for wildness, wild area and wild area will add to the overall length of the document, the Council recognises that it would provide a clearer explanation of terms used. Therefore the Council would support any Reporter recommended change to amend the glossary to include wildness, wild area and wild area, using the definitions provide by SNH.
- The Council would support any Reporter recommended change to include definitions for network of centres, commercial centres and sequential approach in the glossary.

- The Council would support any Reporter recommended change to amend the Special Protection Area (SPA) background text to refer to the most up to date legislation.
- The Council accepts that mentioning Structure Plan Policies in the policy framework for Ramsar Sites is erroneous.
- The Council would support any Reporter recommended change to amend the background text of National Nature Reserves (NNR) to

reflect the new wording of SPP.

- The Council would support any Reporter recommended change to amend the background text of Sites of Special Scientific Interest (SSSIs) to reflect the new wording of SPP.
- The Council would support any Reporter recommended change to amend the background text of National Scenic Areas (NSA) to reflect the new wording of SPP.
- The Council would support any Reporter recommended change to include reference to the NSA Special Qualities Report in the background text of NSAs.
- Battlefields and designated wrecks are included in the supporting text of policy 58 at paragraph 21.1.3. At the time of writing the proposed plan Historic Scotland had not yet consulted on Battlefields. This consultation has now happened and they are to be known as Historic Battlefields. The Council accepts that it was erroneous to not include entries for them in appendix 6.2 and have the background text added once it was available.
- The Council recognises that adding a link to the SLA citations to the background text would provide further information for the reader. Therefore if the Reporter sees fit, the Council would support this addition to the background text.
- The Council does not accept that the second paragraph of the background to wild areas needs amending. The amended wording suggested by SNH implies that the Council has accepted that it will be a designation that will be split between national and local/regional. At this stage there is no commitment to a wild land national designation, and the SPP (2010) does not identify the significance/importance it attributes to wild land. Therefore the Council will not commit to accepting it as a national feature. It should be noted that as per 21.1.2 of the plan, locally and regionally important features can be features identified by national organisations.
- Mapping of features due to the size of the area that the plan covers it is difficult to provide detailed mapping. However anyone who wants to see any features in more detail can request this from the Planning and Development Service. The SPP states, "Development plans should provide clear guidance on what will or will not be permitted and where. This should be very clear from the proposals map. Only policies that provide a clear indication of how a decision maker will react to a development proposal should be included in the plan. Plans should therefore provide opportunity and stability." Whilst the Council has endeavoured to provide mapping where possible, where it cannot there is nevertheless "clear guidance on what will or will not be permitted and where."
- Assessment of SLAs The Council and SNH feel that the scope of the assessment is appropriate because we are confident in the methodology used to define the proposed AGLV's for the Structure Plan 2001. This enables us to focus resources on ensuring the special qualities of these areas and their sensitivities are well recognised and comprehended and appropriately protected/enhanced. The background to this work is explained in more detail in the schedule 4 for Policy 58

Natural, Built and Cultural Heritage. A link to the assessment itself will be added to make it clearer. Also the second sentence will be amended to," With reference to the Assessment of Highland Special Landscape Areas the council will consider the potential impacts of development proposals on the integrity of SLA's, including impacts on the wider setting."

 Change name of SLA to Local Landscape Area – Local Landscape Areas are mentioned in the SPP as the type of feature rather than a suggested name. Unfortunately Local Authorities do not have the same names for these areas. The Guidance on Local Landscape designations recognised this and strongly encourages local authorities to call them Special Landscape Areas so that there could be a common name.

- The Council is of the view that there are sufficient "hooks" within the Local Development Plan for the Supplementary Guidance which it intends to prepare. <u>Paragraph 96 of the Circular 1/2009</u> states that there is a requirement for an appropriate context within the Local Development Plan, and gives examples of where Supplementary Guidance is appropriate:
  - Detailed policies where the main principles are already established
  - Allocations of small areas of land or local policy designations that do not impact on the spatial strategy of the wider plan area
  - Development briefs and masterplans
  - Exact levels of developer contributions or methodologies for their calculation
  - o Forestry and woodland strategies
  - Aquaculture framework documents
- Paragraph 98 of the Circular recognises that supplementary guidance may be prepared and adopted alongside the LDP, or subsequently. This is the model that the Council has been following.
- The Council is committed to having a full suite of Supplementary Guidance in place at the time the Local Development Plan is adopted. We have commenced work on the majority of the new Supplementary Guidance documents referred to in the Local Development Plan, and have a timetable for the preparation of the remaining ones (as set out in our <u>Development Plan Scheme</u>). We are reviewing the rest of our currently adopted <u>Supplementary Guidance</u> documents to determine whether any further changes are required in the context of the Examination. Any changes to these documents will be widely publicised.
- It is not appropriate to start listing all of the supplementary guidance in paragraph 1.1 as it is already listed in appendix 6.3. If the Reporter see fits an additional bullet point could be added to the list at paragraph 1.1 making the reader aware of the list of supplementary guidance at appendix 6.3.
- The Assessment of Landscape Sensitivity to Wind Turbine Development in the Highlands is a background document to the

Onshore Wind Energy Supplementary Guidance and therefore should not be listed as a piece of supplementary guidance in appendix 6.3.

Appendix 6.4

- The Council would support any Reporter recommended change to update the link to Birds of Conservation Concern on the Red and Amber Lists (page 158).
- This appendix provides details of all of the links to associated documents within the Plan. There is no link within the plan to Guidance of Significance of the Impacts on Birds outwith Designated Areas. Therefore the Council does not accept that details of this link should be added to this appendix.
- The supporting text to Policy 53 mentions the Scottish Government document: Control of Woodland Removal Policy. It would seem sensible to include a hyperlink in Policy 53 to this document to enable ease of reference for the reader. A consequential change would be required to appendix 6.4 to include details of the link to this document.
- The Council would support any Reporter recommended change to amend the link for the Scottish Biodiversity List.

## Proposals Map

- If the Reporter sees fit the Council would support adding the following to the supporting text of Policy 58: "Up to date information on the location of SAC, SPA, SSSI and NSA can be found on SNH's website <u>http://www.snh.gov.uk/planning-and-development/advice-for-plannersanddevelopers/protected-areas/</u>
- The Council appreciates that due to the size of the area and the way features are layered on the proposals map, only the most important feature for an area is shown on the Proposals Map and other features may exist beneath. If the Reporter sees fits the Council would accept additional wording in the supporting text of policy 58 that made clear that where more than one natural, built or cultural heritage features occurs for an area, only the topmost tier feature will be indicated on the map and therefore other features may nest underneath which should also be taken into account.
- As mentioned above the Council will support any Reporter recommended change to include a link to SNH's website where readers of the Plan can access maps. The Plan once adopted will be available as an On Line Development Plan (OLDP) and through this readers will be able to zoom in and look at different layers.
- As already mentioned the OLDP will enable readers to see all the background features for an area.
- It is accepted that due to the size of Highland the Proposals Map does not provide detailed mapping of features. However the Council does not accept that this should affect decision making. The features as shown on the Proposals Map compliment Policy 58 and the text in appendix 6.2. It is clearly stated in Policy 58 that all development proposals will be assessed in the context of the policy framework at appendix 6.2. The OLDP will allow readers to "drill" into the Proposals Map to look at individual features.

- Tree Preservation Orders (TPOs) currently sit as a feature of national importance and the Council believes it should remain there. The policy approach set out in policy 58 and supported by appendix 6.2 was established during the <u>Wester Ross Local Plan</u> and has subsequently been used in the Sutherland Local Plan and the West Highland and Islands Local Plan. All three of these plans have included TPOs as a feature of national importance. The <u>Trees</u>, <u>Woodlands and Development (Draft) Supplementary Guidance</u> supports this approach. TPOs may be confirmed by the Council however this power is given to the Council via legislation.
  - All allocations in the plan have maps accompanying them which clearly show their boundaries.
  - The waste facility shown at Invergordon on the Inner Moray Firth spatial strategy map (figure 3) should be removed as it does not accord with the list in policy 71 waste management facilities.
  - We acknowledge that due to the scale of the map there can sometimes be difficulties in distinguishing between the local/regional features and the wider countryside feature. It should however be remembered that there are local plans which show these features in much greater detail. Determination of any development proposal will be based on Policy 58 in conjunction with the Proposals Map and the policy framework in appendix 6.2.
  - It was erroneous to mention Background Maps in paragraph 21.1.9; it would be impractical at the Highland scale to provide paper maps of each feature. The OLDP will enable readers to look at the Proposals Map in greater detail.
  - Where practical, physical constraints will be mapped in the Physical Constraints Supplementary Guidance
  - The vast majority of the features listed in policy 58 are mapped. In the case of wild land, mapping for this feature is not yet available but will be in the life time of the Highland wide Local Development Plan. There is a clear policy given in Appendix 6.2 as to how the Council expects this issue to be dealt with in the meantime. There is also a hook for the Supplementary Guidance which will be prepared and consulted on in due course. For locally important croft land there is no comprehensive map base for the Council to use but policy 48 makes the way we intend to safeguard croft land clear. Likewise although all amenity trees are not mapped the Supplementary Guidance for Trees, Woodland and Development makes the Council's position clear. There is a clear policy given in Appendix 6.2 as to how the Council expects this issue to be dealt with in the meantime. Policy 58 clearly states that the policy must be read in conjunction with the policy framework at appendix 6.2 and the Proposals Map.

#### Any further plan changes commended by the council

- The Council suggests that the simplest way for the Reporter to remedy the Council's error in the policy framework for Ramsar Sites is to delete the mention of Structure Plan Policies.
- The Council suggests that the simplest way for the Reporter to remedy the Council's error of not including battlefields or designated wrecks is

to include entries for them in appendix 6.2. Following the Historic Scotland consultation, battlefields is to be called Historic Battlefields.

- The Council suggests that the simplest way for the Reporter to remedy the Council's error of having Sites of Local Nature Conservation Interest as an entry would be to replace it with Local Nature Conservation Sites to reflect policy 58.
- The Council suggests that the simplest way for the Reporter to remedy the Council's error of policy numbering on the Proposals Map is to change Policy 59 to Policy 58 and change Policy 72 and 73 to Policy 71 and 72.
- The Council commends to the Reporter that Appendix 6.3 Supplementary Guidance is not attached to the paper copy of the Plan but is available electronically. This will enable it to be updated.
- The final paragraph in section 26 (page 147) is erroneous and the Council commends to the Reporter that it be deleted.

#### **Reporter's conclusions:**

Added by Reporter at later date.

#### Reporter's recommendations:

Added by Reporter at later date.