

Mr Brian Archibald
Directorate for Planning and Environmental Appeals
4 The Courtyard
Callendar Business Park
Callendar Road
Falkirk
FK1 1XR

21 December 2009
Our ref: CNS/LP/Hi/West Highland/WHILP

Dear Sir

**Town and Country Planning (Development Planning) (Scotland) Regulations
2008.
Examination of the West Highland & Islands Local Plan Deposit Draft
Request for Further Information**

Further to your letter dated 16 November 2009 addressed to Kristin Scott, please find attached a Written Statement from Scottish Natural Heritage relating to the Appropriate Assessment of the above plan as undertaken by The Highland Council.

As requested, I am copying this statement to all the participants attending the hearing.

Yours faithfully,

Martin Faulkner
Area Officer, East Lochaber
martin.faulkner@snh.gov.uk

cc Mr & Mrs MG Halligan, Fort William
Mr E Griffiths, Fort William
Mr A Cumming, Fort William
Mr R Bruce, Fort William
Mr M Cameron, co/ Mr D Tough
Mr I Kelly, Highlands & Islands Enterprise
Dr I Strachan, Roybridge
Mr I Michie, Montagu Evans LLP, per Inverloch Castle Ltd
Mr & Mrs J Rose, Fort William
Mr T Stott, The Highland Council

**Town and Country Planning (Development Planning) (Scotland) Regulations 2008.
Examination of the West Highland & Islands Local Plan Deposit Draft**

**Written Statement from Scottish Natural Heritage on Allocation MU8 – Lundavra
(adjacency to Ach an Todhair Site of Special Scientific Interest)**

1. Background

1.1 Ach an Todhair Site of Special Scientific Interest (SSSI) is an area of woodland and open ground to the south-west of Fort William covering an area of approximately 175ha. It is notified as an SSSI because it contains approximately half of the extent of upland mixed ashwood in Lochaber.

1.2 The site is also notified for its upland assemblage of heath and acid grassland, rich in flowering plants. However this interest is remote from the MU8 allocation.

2. Proximity of MU8 to Ach an Todhair Site of Special Scientific Interest

2.1 We did not raise any concerns at the time of the publication of the Local Plan Deposit Draft in December 2007 because we did not consider that the proximity of this allocation presented a threat to the notified interests.

2.2 There are several examples within Lochaber of SSSIs that have communities adjacent, near to them and in some cases within the site without detriment to the natural heritage interest. Some of the houses along the A82 already have ground within Ach an Todhair SSSI without significant harm to the site. We consider that development of the type proposed does not present a significant risk to this SSSI.

3. Issues since December 2008 that further reduce the risk to the SSSI

3.1 Since our response to the May 2008 Deposit Draft of the Lochaber Local Plan it has been reported to us by the Botanical Society of the British Isles that one of the largest populations of lesser butterfly orchid in Lochaber is present in MU8.

3.2 Lesser butterfly orchid is included within SNH's Species Action Framework and on the Scottish Government Biodiversity List because it declined in distribution by 33% between 1964 and 2002, but there is good knowledge about how to halt and reverse that decline.

3.3 The orchids are located in the area to the west of the site, immediately adjacent to the SSSI. Excluding development from the area of orchids at the design stage would build in a buffer to the SSSI.

3.4 It has also been reported that otter use the Allt Mhic Aonghais for moving between the shore and the higher parts of the site, and for washing in pools. Washing in freshwater is essential for otters that also use the sea in order to maintain the waterproofing of their fur.

3.5 We believe that both of the above issues could be satisfactorily dealt with at the detailed design stage after appropriate species surveys.

4. Conclusion

4.1 We are content that inclusion of MU8 in the West Highland & Islands Local Plan will not threaten the important natural heritage interests of the area.