

# Highland Council Inner Moray Firth Local Development Plan

## Comments received for the consultation that ended on 13th December 2013 ordered by Site

Customer Number  Name  Organisation

Agent Name and Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

### Comment Changes

The Trust recognises that the master plan for this site is approved and the site (per 4.19) is “shovel ready”. Large area of existing woodland at NH 757514 and smaller woodland at NH768511 are AW. Total of 37ha to be lost. Loss of woodland on this site is strongly opposed. Developments must take into account effect on any remaining woodland. National Planning Framework 3 Main Issues Report recognises importance of the development of this site (p 67) but also requires consideration of A96 developments to how they “contribute to the area’s sense of place, environmental quality and community wellbeing”

### Representation

The Woodland Trust Scotland considers that any woodland included in Scottish Natural Heritage’s Ancient Woodland Inventory (AWI) which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and is therefore high value for conservation and worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. Highland Council supplementary guidance notes that woodlands and trees offer multiple benefits in terms of addressing climate change, improving the water environment, providing valuable habitats, timber industry and creating recreational opportunities. Considerations include the cumulative impact of woodland removal, and fragmentation of habitat. Both Scottish Government policy and the Highland Wide LDP policy create a presumption in favour of protecting woodland. The Highland Wide LDP in policy 57 recognises ancient woodland as (depending on the category) of regional or national importance. Both the Woodland Trust Scotland and Scottish Planning Policy at para 148 consider ancient and semi natural woodland to be an important and irreplaceable national resource and should be protected and enhanced. The Woodland Trust Scotland would like to see a clear statement that the loss of ancient woodland cannot be mitigated, and therefore warrants protection from development. Development impacts on ancient woodland in a number of ways including chemically, disturbance by human activity, fragmentation, and colonisation of non-native plants. The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Allocated to

Customer Number	00523	Name	Mrs Cerian Baldwin	Organisation	Scottish Environment Protection Agency	
Agent Name amd Organisation (if applicable)						
Section	4.Development Allocations		Paragraph			
Reference	IA1		Type	Change	Comment Late	No

Comment Changes

We object unless the site has a developer requirement for a Flood Risk Assessment. This in order to ensure any prospective developers are full informed that the site is at flood risk and that the developable area may be affected.

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Allocated to	Inverness Airport	IA1	Inverness Airport Business Park	
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