

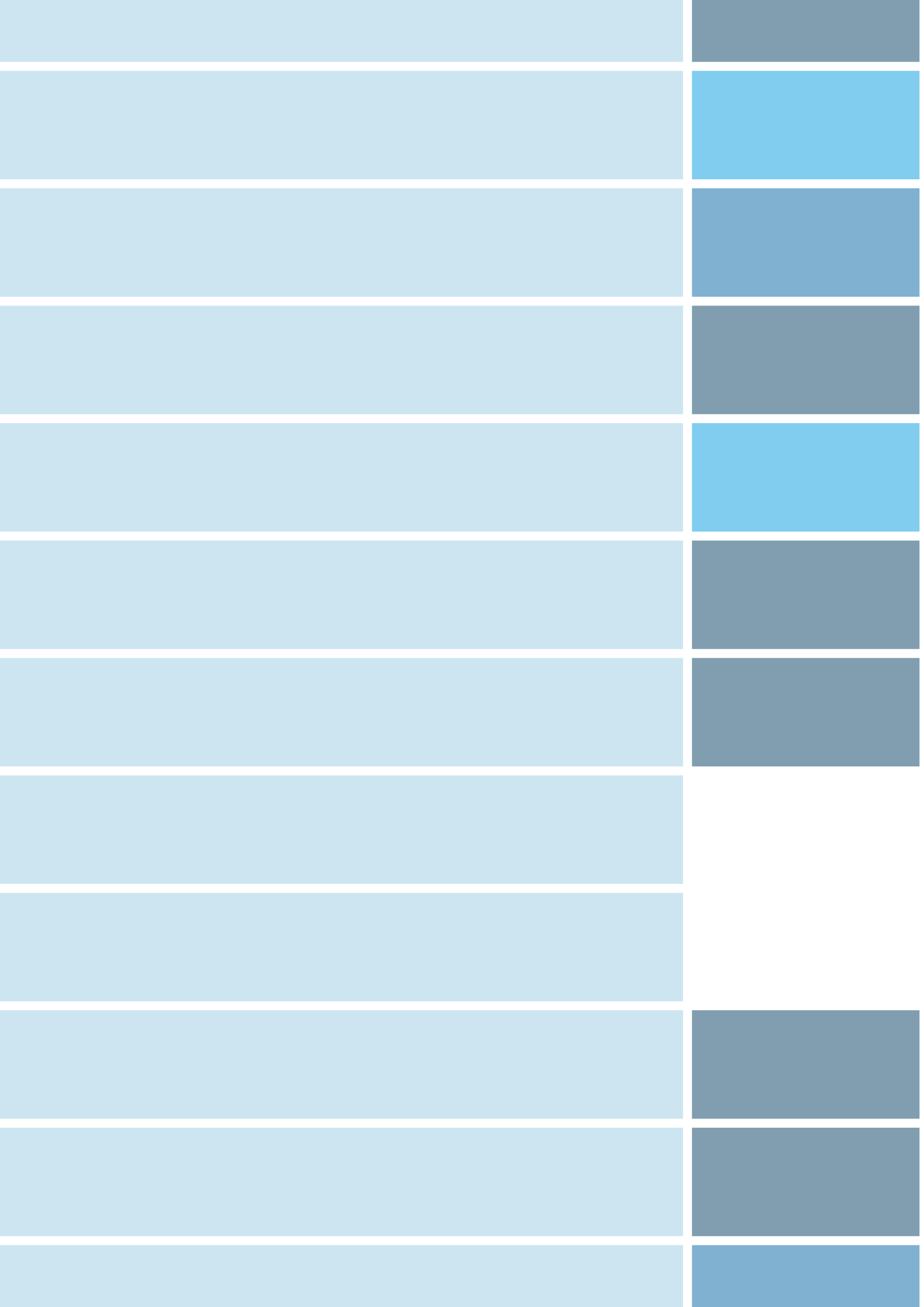
Inner Moray Firth Local Development Plan Strategic Environmental Assessment

Plana Leasachaidh Ionadail Linne Mhoireibh A-Staigh Measadh Àrainneachd Ro-innleachdail

July 2024

Finalised Environmental Report

www.highland.gov.uk



Inner Moray Firth Local Development Plan 2

Finalised Environmental Report

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1 A More Proportionate and Holistic Approach

The Purpose of Strategic Environmental Assessment

The Environmental Assessment (Scotland) Act 2005 introduced a statutory requirement for plans such as the Inner Moray Firth Local Development Plan - because it is likely to have significant environmental effects - to be shaped by a Strategic Environmental Assessment (SEA). The wider purpose of SEA is to make sure that consideration of environmental effects is embedded in the public policy decision making process. This consideration should be early in the process and have an effective and evidenced outcome on the process. There is an additional aim of engaging the public in SEA.

A More Proportionate Approach

The Scottish Government, as part of its reform of the Scottish planning system, has undertaken a review of SEA following concerns expressed about its proportionality. Some SEA practitioners find the amount of information to be collected and analysed as part of the SEA process to be disproportionate to any beneficial impact of that analysis on the final public policy. Highland Council's experience is that the aim of engaging the public at large in SEA is inhibited by the overly technical, complex and untargeted nature of the current process. Therefore, in the spirit of proportionality, this Environmental Report took a different approach being more targeted in terms of: the range of data collected and analysed; the policy and development site options assessed; and, hyperlinking rather than including reference information within the Report.

A More Holistic Approach

SEA, as introduced in Scotland, only considers environmental effects in making public policy decisions. Whilst this separation from other decision making factors purifies and maintains the integrity of the environmental effects assessment process it has led some decision makers to regard SEA as divorced from, not an integral part of, the decisions that they make. Other nations of the UK integrate consideration of environmental effects with socio-economic and other factors in making public policy decisions. This Environmental Report particularly in its assessment of the detail of individual development sites included consideration of socio-economic and other factors in explaining the Plan's development site choices. We feel that the public and others better understand our choices if they can see how we've assessed all considerations not just those related to the environment. However, to respect the relevant legislation and the purity of the SEA process, this document concentrates on environmental effects. The Appendix to this Report lists the 48 questions used to assess all potential development allocations and differentiates in golden coloured rows those which are socio-economic. In summary these are questions 34 (transport network capacity), 38 (school capacity), 40 (water and sewerage capacity) and 45-47 (viability).

Recognising Data & Other Limitations

The 2005 Act requires the Council to describe any difficulties (such as technical deficiencies or lack of expertise) encountered in compiling the required information for this Report. The Council has utilised the best data that is currently and publicly available in compiling the assessment but recognises that in some cases that it is partial and dated. Through the Report process we asked all parties for better evidence and commit to continue to improve the evidence base for future plan production and monitoring. The Consultation Authorities were very helpful in providing technical expertise and evidence to assist the SEA.

2 An Easy Read Summary

The purpose of this document – the Highland Council must produce an Environmental Report to show how any local development plan will help protect and ideally enhance the environment. For example, how it doesn't support new building in areas that will cause flooding or damage local natural heritage such as important woodland. This section is a *Non-Technical Summary* as required under the relevant legislation.

Likely environmental effects of the Plan – this Report sets out the existing condition of the environment (known as the “baseline”) and the good and bad effects that we think the Plan may have on the environment i.e. the likely changes to this baseline. These are set out in sections 3, 5, 6 and 7. In summary we believe we assessed all relevant effects and where necessary included suitable mitigation. Section 6 provides a *Non-Technical Summary* at settlement level and is not replicated here for the sake of brevity.

Reducing bad effects and increasing good effects – one purpose of this Report was to define what needed to be done to make the Plan better in terms of its potential effect on the environment. These improvements are called mitigation and include measures such as new tree planting, more public open space and better habitat for wildlife. This mitigation is detailed in the General Policies, Placemaking Priorities and Site Developer Requirements of the Plan. This list tells a developer what they will have to do to protect the environment and therefore to increase their chances of obtaining a planning permission on any site. Mitigation is set out in sections 5, 6 and 7.

How the Plan's content has been influenced by this Report - we believe that we've made reasonable choices in deciding what scale, type and location of new building is supported by the Plan taking account of likely environmental effects and other effects detailed in this Report. Examples of how this assessment has shaped the Plan are set out in sections 5, 6, 7 and 9.

What's Next? – this is the final formal stage in the SEA process. A post Plan adoption SEA statement is being published in parallel with this document.

4 The Environmental Baseline and SEA Objectives

What is a Baseline?

Before we assessed what impact the Plan may have on the environment we needed to know the current condition of the local environment. This is known as the Environmental Baseline against which potential, future positive and negative effects can be tested. There is a lot of published and freely available information on the current state of the environment in each part of Scotland and to date most councils including Highland have chosen to replicate this information in their respective environmental reports.

We believe that repeating information available elsewhere adds little value to the SEA process and outcome so this section of this Report lists weblinks to all of the information we used to define the baseline and to assess likely effects but doesn't contain the information itself.

We believe that we used the best publicly available and reliable information in producing this Report but stated we were open to considering the use of new/different data or a better methodology in interpreting existing data. An example of this was the availability of SEPA's Future Flood Risk mapping that was made available and then used during the later stages of the Plan process.

The baseline is always changing because of natural processes and global issues like climate change so we also compared what might happen to the Plan area's environment if we do nothing. Given that land use plan preparation is a statutory responsibility, not producing the Plan was not a realistic option so we equated the "do-nothing" option to continuing with the policies we have in the adopted Inner Moray Firth Local Development Plan 2015 and Highland-wide Local Development Plan 2012.

Data Sources

We used the Scottish Government's online environment tool "Scotland's Environment" <https://www.environment.gov.scot/> and for the site assessment process we have used a variety of mapped data the public sources of which are listed below. Comments from the Consultation Authorities and other consultees and internal Highland Council data have also been used in the assessment process.

Water Environment

<https://www.sepa.org.uk/data-visualisation/water-environment-hub/>

Flood Risk – SEPA and Internal THC data

<https://www.sepa.org.uk/environment/water/flooding/flood-maps/>

Coastal Erosion

<https://snh.maps.arcgis.com/apps/webappviewer/index.html?id=3b70a725513446749e62612e3dd4b463>

Natural Heritage Areas

<https://sitelink.nature.scot/home>

Woodland and Other Natural Heritage

<https://map.environment.gov.scot/sewebmap/>

Vacant and Derelict Land

<https://www.arcgis.com/apps/webappviewer/index.html?id=71a83deabc2e4d84ba2bdd0e870e0c8e>

Soils

https://map.environment.gov.scot/Soil_maps/?layer=1

Prime Farmland

https://map.environment.gov.scot/Soil_maps/?layer=1

Landscape

<https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscape-character-types-map-and-descriptions>

<https://www.gov.scot/publications/national-scenic-areas-of-scotland-maps/>

https://www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas
Wild Land

<https://www.nature.scot/wild-land-2014-maps>

Historic Environment

<https://her.highland.gov.uk/>

Outdoor Access

<https://highland.maps.arcgis.com/apps/webappviewer/index.html?id=2fd3fc9c72d545f7bcf1b43bf5c8445f>

<https://www.walkhighlands.co.uk/>

School Capacities

https://www.highland.gov.uk/info/878/schools/818/school_roll_forecasts

Developer Contributions

https://www.highland.gov.uk/directory_record/712087/developer_contributions

Delivery Programme

https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/809/delivery_programmes

The Sensitivity of the Plan Area's Environment to Development

Relative to the rest of Highland, the Inner Moray Firth has fewer environmental designations and other constraints and many of these relate to the coastal and mountainous margins of the Plan area. Therefore, most potential conflicts between development and the environment can be managed and mitigated. More challenging is that the majority of future growth in Highland will take place within the Plan area. The Plan's solution is to harness and direct that growth to environmentally sustainable locations. The Plan's optimum locations are generally those within the existing, larger settlements like Inverness but even here built heritage, contamination, flood risk and pollution issues may arise.

Indeed, many of these major settlements are in coastal or estuarine locations because historically these were close to fishing opportunities, river fording points, better drained and agriculturally productive land, and transport was easier by water than by land. Thankfully, these locational factors have changed and now environmental effects sensitivity can play a greater role in growth location selection. For example, climate change with its associated rise in average sea levels and the frequency and intensity of flood events, suggests that new development, even if within or close to the major settlements, should only be supported close to the coast if it has a functional imperative to be there – e.g. an expansion of an existing harbour.

Similarly, coastal recreational and tourism activities can adversely affect offshore marine interests and the Plan ensures its support for an increase in sustainable tourism considers these effects and suitable mitigation.

SEA Objectives

We assessed the Plan's policies and development sites against the environmental baseline and a set of SEA Objectives. These Objectives were defined and refined over successive development plans in Highland, had input from the Consultation Authorities and addressed all the main SEA topics which are defined in legislation (Schedule 3 of the Environmental Assessment (Scotland) Act 2005). The Plan's SEA Objectives are as follows.

1. To conserve and where possible enhance biodiversity and accord to the protection of valued nature conservation habitats and species.
2. To improve the living environment for all communities and promote improved health of the human population.
3. Safeguard the soil quality, geo-diversity and improve contaminated land.
4. Avoid and then if necessary reduce flood risk, and protect and where possible enhance and restore the water environment.
5. To protect and improve air quality (particularly within the Inverness Air Quality Action Plan area), reduce levels of air pollution and reduce levels of nuisance
6. Reduce greenhouse gases and contribute to the adaptation of the area to climate change.
7. Manage, maintain and promote sustainable use of material assets.
8. Protect and enhance, where appropriate, the area's rich historic environment and its setting.
9. Protect and enhance the character, diversity and unique qualities of the landscape.

5. What is the Plan and how does it relate to other Environmental Policies, Plans and Legislation?

What is the Plan?

The Plan's title is the Inner Moray Firth Local Development Plan 2. It is the second local development plan to be prepared for the Inner Moray Firth area and as of 27 June 2024 it repeals and replaces the existing Inner Moray Firth Local Development Plan which was adopted by the Highland Council in July 2015. Its preparation was required by statute under the Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006 and Planning (Scotland) Act 2019. Its subject is land use planning and it has full statutory status in decision making from 27 June 2024. It will continue to be the principal, statutory local planning policy document until it is replaced by an adopted successor "new-style" local development plan for Highland which won't happen until 2027 at the earliest. The Plan contains outcomes and a spatial strategy that are likely to be maintained beyond 2027.

The geographic area covered by the Plan is shown in Figure 1 below.



Figure 1

The purpose of the Plan is to provide an up-to-date land use framework principally for the main settlements across this Plan area. The Plan promotes the growth of the area by identifying suitable land uses in settlements. It sits alongside another Highland Council document called the Highland-wide Local Development Plan and now the Scottish Government's National Planning Framework 4, which set the context for strategic growth and provides general policies.

The Plan includes:

- an introductory context
- a set of desired Outcomes
- a Spatial Strategy
- a number of general policies applicable across the Plan area
- development site allocations and boundaries
- site-specific developer requirements
- areas of valued local greenspace which are to be protected from development

The Plan and the Environmental Report followed a similar, parallel, integrated timescale and process as detailed in Figure 2 below.

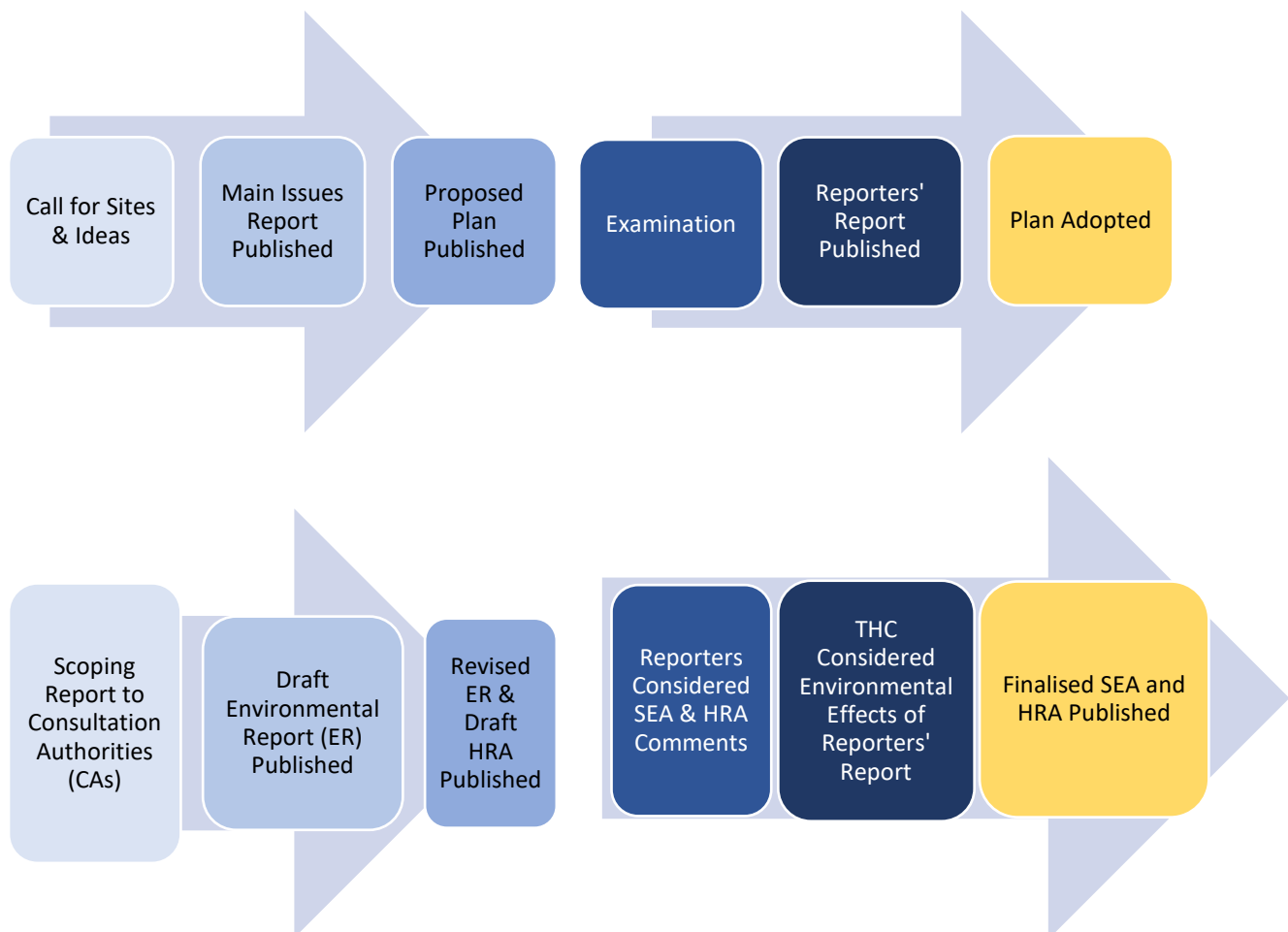


Figure 2

How does the Plan relate to other Policies, Plans and Environmental Law?

There is a myriad of planning and environmental policies, programmes and plans that could affect any single development proposal within the Inner Moray Firth area. The Plan is another consideration material to the outcome of development proposals. Each plan, policy and programme has regard to, or takes account of, the suite of other guidance.

The Plan is a statutory document and forms part of the “approved development plan” for the Inner Moray Firth. This status requires decision makers first to check whether any development proposal is in overall conformity with the “approved development plan” before considering other material considerations. This offers the Plan (and National Planning Framework 4) a degree of primacy as a factor in determining planning applications and other proposals.

However, other, environmental policy and legislation may also be applicable to the consideration of any proposal and was relevant in shaping the content of the Plan. A list of national environmental policy can be accessed via the first link below and a list of national environmental legislation via the second link. The Scottish Government intends

to match the environmental protection offered by current and even future European legislation as set out in the “Continuity Act” (also linked below).

<https://www.gov.scot/environment-and-climate-change/>

<https://www.netregs.org.uk/legislation/scotland-environmental-legislation/>

[Continuity Act](#)

Other environmental regulators also have their own policies and guidance and these can be accessed via the links below.

<https://www.sepa.org.uk/regulations/how-we-regulate/policies/>

<https://www.nature.scot/about-snh/our-work/our-policy-and-guidance>

<https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

<https://environmentalstandards.scot/>

Habitats Regulations Appraisal

The Council also carried out a Habitats Regulations Appraisal (HRA) to accompany the Proposed Plan. Article 6(3) of the EC Habitats Directive requires that any plan which is not directly connected with the management of a European site, but would be likely to have a significant effect on such a site shall be subject to an “appropriate assessment” of its implications in view of the site’s conservation objectives.

Scottish Natural Heritage (SNH) produced guidance on Habitats Regulations Appraisal of Plans in 2015 which outlines a thirteen stage appraisal process. This guidance was followed to prepare the Plan’s HRA. All the policies and potential development sites were subject to HRA, in regard to any likely significant effect on a European designated site (Special Areas of Conservation, Special Protection Areas and/or Ramsar Sites). This Report’s SEA Site Assessment Matrix includes assessment of this matter and acted as an early screening of sites likely to require HRA. A finalised, post-adoption HRA Record is available via the Council’s website.

6 Assessment of Policy Options

Our Policy Options and Choices

The Inner Moray Firth Proposed Local Development Plan 2 contains a vision expressed as overarching Outcomes. These are based on the already determined national, regional and sub-regional outcomes, which have been through successive SEA processes and therefore their assessment is not included in this Report. Instead, we chose to assess alternative policy approaches to the Main Issues identified in the Main Issues Report that flowed from the outcomes because although general they are more specific to the Plan area and its environment.

This initial version of the Plan contained a choice of ways to address the Main Issues we identified. We set out our initial, preferred approach for each Main Issue but also other options that we didn't favour and gave our reasons for all our preferences. Because the Main Issues Report was a consultation document some of our preferences were suggested approaches to the Main Issues rather than definitive policies and therefore, our assessment of them against the SEA Objectives and Environmental Baseline was similarly inexplicit. At Proposed Plan stage, the Revised Environmental Report contained a more focussed assessment of more definitive policies. For each Policy we included a "do-nothing" option, which we equated to continuing with the policies we have in the adopted Inner Moray Firth Local Development Plan 2015 and Highland wide Local Development Plan 2012.

The scoring in the tables below is our assessment of the overall post mitigation effect on each SEA topic or objective of our final policy. At the end of this section, we have also included a brief SEA of the Scottish Government appointed Reporters' changes to the Plan's general policies following Examination.

"--" which means significant negative effects;

"-" which means minor negative effects;

"=" which means an overall neutral effect;

"+" which means minor positive effects; or

"++" which means significant positive effects.

POLICY 1: Low and Zero Carbon Development	
SEA Objective	<p>Our Policy: promotes carbon emissions reduction in new developments. A developer will have to evidence that each proposal's siting, materials, design and choice of heat/energy source, generation, storage and use are sufficiently low or zero carbon.</p> <p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: reducing emissions from surface transport and heating of buildings are targets that planning policies can and should help achieve. This policy seeks to address the latter. Although it only applies to new build development it should have a long term, incremental, positive effect on climate change and therefore indirectly on natural heritage. Heat network and other low and zero carbon infrastructure could adversely affect natural heritage resources.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: Heat network and other low and zero carbon infrastructure potential adverse impact on natural heritage resources should be addressed through detailed design specifications and guidance.</p> <p>Post mitigation score for policy: +</p>
2 Population and Human Health	<p>Likely effects of policy: reduced emissions from new buildings may have a minor positive effect on the local living environment particularly where, currently, traditional fuels such as coal, peat or wood are being burnt.</p>

	<p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: there are unlikely to be any direct effects on soils except perhaps if ground source heat pumps are used which cause additional disturbance and change natural soil temperatures.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: there are unlikely to be any direct effects on the water environment or flood risk.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: reduced emissions from new buildings may have a minor positive effect on local air quality particularly where, currently, traditional fuels such as coal, peat or wood are being burnt.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: reducing emissions from surface transport and heating of buildings are targets that planning policies can and should help achieve. This policy seeks to address the latter. Although it only applies to new build development it should have a long term, incremental, positive effect on climate change.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: more carbon efficient and local use (and re-use) of land, buildings, materials and energy should minimise the effect of new development on material assets.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the policy is almost entirely directed at the siting, design and heat energy arrangements for new build development so is very unlikely to have any direct effects on cultural heritage.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: Undergrounding of heat networks, wall mounted air source heat pumps and heat efficient window designs may compromise adjoining built heritage interests but these can be addressed through detailed design specifications and guidance.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: low carbon, new build development doesn't have particular visual and landscape effects that are different to other forms of new build development. If</p>

	<p>anything choosing sheltered southerly aspect siting may result in a better fit with many landscapes. Similarly, most heat networks are undergrounded and even wall mounted air source heat pumps are now less visually intrusive.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
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POLICY 2: Nature Protection, Restoration and Enhancement	
SEA Objective	<p>Our Policy: introduces a developer requirement to protect and improve biodiversity including a financial contribution from larger schemes towards enhancement.</p> <p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the policy seeks biodiversity net gain via direct developer provision or contributions for off-site provision and therefore the net change should be positive.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
2 Population and Human Health	<p>Likely effects of policy: if biodiversity enhancement is delivered via on-site or closeby habitat creation or improvement then there should be positive effects for human health and amenity.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: if biodiversity enhancement is delivered via the creation of habitats that enrich soils then there could be positive effects. Developer contributions are also likely to be used for used for regional peatland restoration schemes.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
4 Water	<p>Likely effects of policy: habitat creation/enhancement is likely to include improvements to the water environment – e.g. naturalisation of watercourses, riparian woodland, additional natural flood plain areas etc</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
5 Air	<p>Likely effects of policy: habitat creation/enhancement is likely to aid a small improvement in local air quality particularly if provided adjoining major transport corridors.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: habitat creation/enhancement is likely to help address climate change – e.g. additional woodland, additional natural flood plain areas, and developer</p>

	<p>contributions are also likely to be used for used for regional peatland restoration schemes.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: habitat creation/enhancement is likely to increase the overall quantity and quality of the stock of natural resources for future generations.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
8 Cultural Heritage	<p>Likely effects of policy: habitat creation/enhancement could have an indirect benefit to cultural and built heritage if it occurs adjoining such heritage by aiding enhanced placemaking but many new or enhanced habitats are likely to be distant from existing development – e.g. Sutherland peatlands – or on the edge of settlements where new expansion areas are created.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: habitat creation/enhancement is likely to provide additional amenity and visual/landscape benefits – e.g. additional riparian woodland, naturalised watercourses, additional wetlands etc. However, peatland restoration is unlikely to offer any net enhancement.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>

	<p>POLICY 3: Water and Waste Water Infrastructure Impacts in the Nairn & Inverness Areas</p>
	<p>Our Policy: rolls forward and combines our existing policies to minimise the adverse water and sewage impacts of new development on the environment. Enhancement is sought but only where reasonable and practicable.</p>
SEA Objective	<p>Alternative approaches considered: we have considered the continuation, unaltered, of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: by safeguarding and possibly enhancing the water environment the policy should have an indirect neutral or positive effect on habitats and species.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: no positive effects are likely but the policy will minimise the adverse odour and occasional other pollution effects sometimes associated with inappropriate waste water treatment facilities.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>

3 Soil	<p>Likely effects of policy: no positive effects are likely but the policy will minimise the pollution effects sometimes associated with inappropriate waste water treatment facilities.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: by safeguarding and possibly enhancing the water environment the policy should have a neutral or positive effect on the water environment.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: no positive effects are likely but the policy will minimise the adverse odour pollution effects sometimes associated with inappropriate waste water treatment facilities.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: no positive effects are likely but the policy will safeguard the water environment to a degree and e.g. will help mitigate against potential additional, in-combination effects from climate change – e.g. by regulating water levels in sensitive waterbodies which may be affected by both abstraction and flash floods / drought periods.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: the policy is unlikely to have significant positive or negative effects in relation to material assets.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the policy is unlikely to have significant positive or negative effects in relation to cultural heritage as such heritage is seldom affected by water quality or abstraction.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: beach/river pollution and varying loch levels can have minor adverse visual/landscape effects but these tend to be temporary or indirect effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>

POLICY 4: Greenspace	
SEA Objective	Our Policy: provides a clearer and stronger protection for identified greenspaces.
	Alternative approaches considered: <i>we have considered the continuation of existing Highland planning policies that affect this issue.</i>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: better evidence to justify the policy should make it easier to enforce and therefore to protect green spaces but effects relative to the existing baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
2 Population and Human Health	<p>Likely effects of policy: mainly neutral but better identified and protected local green spaces should indirectly support greater active travel and therefore improve human health.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: better evidence to justify the policy should make it easier to enforce and therefore to protect green spaces but effects relative to the existing baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
4 Water	<p>Likely effects of policy: this policy is about better evidence to justify the better protection of green spaces some of which will contain waterbodies and therefore effects relative to baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
5 Air	<p>Likely effects of policy: mainly neutral but better audited and protected local green spaces should indirectly support modal shift to zero additional emissions active travel and therefore improve air quality.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
6 Climatic Factors	<p>Likely effects of policy: mainly neutral but better audited and protected local green spaces should indirectly support modal shift to zero additional emissions active travel.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: this policy is about better evidence to justify the better protection of green spaces therefore material assets effects relative to baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p>

	<p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: this policy is about better evidence and a policy for protecting green spaces and therefore effects relative to baseline will be minimal. However, there may be minor positive effects relative to a “do-nothing” continuation of existing policies for example where Designed Landscapes, listed building settings or battlefields overlap with protected green spaces and networks.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: this policy is about better evidence and a policy for protecting green spaces and therefore effects relative to baseline will be minimal. However, there may be minor positive effects relative to a “do-nothing” continuation of existing policies for example where better audited green spaces and networks are also important in landscape terms.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>

POLICY 5: Green Networks	
	<p>Our Policy: provides a clearer policy for Green Networks that are mapped within main settlements.</p>
SEA Objective	<p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: a clearer policy for and mapping of green networks within main settlements should aid the protection of the connectivity that they offer but effects relative to the existing baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
2 Population and Human Health	<p>Likely effects of policy: mainly neutral but better identified and protected local green networks should indirectly support greater active travel and therefore improve human health.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: a clearer policy for and identification of green networks should make it easier to protect the connectivity that green networks offer but effects relative to the existing baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
4 Water	<p>Likely effects of policy: this policy is about a clearer definition and identification of green networks many of which will contain watercourses or waterbodies and therefore effects relative to baseline will be minimal.</p>

	<p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
5 Air	<p>Likely effects of policy: mainly neutral but a clearer policy and mapping of green networks may indirectly support modal shift to zero additional emissions active travel and therefore improve air quality.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
6 Climatic Factors	<p>Likely effects of policy: mainly neutral but a clearer policy and mapping of green networks should indirectly support modal shift to zero additional emissions active travel.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: this policy is about a clearer policy and mapping of green networks and therefore material assets effects relative to baseline will be minimal.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: this policy is about a clearer policy and mapping of green networks and therefore effects relative to baseline will be minimal. However, there may be minor positive effects relative to a “do-nothing” continuation of existing policies for example where Designed Landscapes, listed building settings or battlefields overlap with green networks.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: this policy is about a clearer policy and mapping of green networks and therefore effects relative to baseline will be minimal. However, there may be minor positive effects relative to a “do-nothing” continuation of existing policies for example where mapped green networks are also important in landscape terms.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>

	POLICY 6: Town Centre First
SEA Objective	<p>Our Policy: introduces a stronger protection for identified town centres but also a more supportive approach to change of use proposals including residential within those centres.</p>
	<p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>

1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: our identified town centres are limited in number and boundary and have few natural habitats. Almost all development proposals will be conversions or re-developments of brownfield land. Bird and bat populations may be present in certain older, often vacant buildings and these issues will need to be surveyed, assessed and mitigated.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: regeneration of our commercial, leisure and social hub centres should help re-create vibrant meeting places within active travel distance of local populations especially because housing uses will be better encouraged within these centres. This should help both mental and physical human health.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: our identified town centres are limited in number and boundary and have very few greenfield sites. Almost all development proposals will be conversions or re-developments of brownfield land.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: all our identified town centres are serviced by public sewerage albeit some of that sewerage network is outdated and some combined systems are prone to storm water spillage which can harm the water environment. Further town centre development is likely to increase the loading on such systems. Similarly, Dingwall and Inverness town centres are subject to flood risk and further development there may increase the impact of such risk.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: Scottish Water investment in the separation of surface and foul sewerage and Flood Risk Assessments for relevant development sites and proposals.</p> <p>Post mitigation score for policy: -</p>
5 Air	<p>Likely effects of policy: the successful regeneration of our town centres is likely to increase vehicle trips to and concentrate them within those centres and therefore likely increase air pollution and its harmful effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: other policies, proposals and funding to achieve shift to zero/less polluting modes of travel. More housing within town centres and within active travel range of them.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy:</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: the policy will encourage the re-use of vacant or underutilised sites and buildings which should be beneficial.</p>

	<p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
8 Cultural Heritage	<p>Likely effects of policy: many of the identified town centres contain conservation areas, listed buildings and other cultural heritage and therefore re-development proposals may cause adverse effects or alternatively conversions may bring built heritage buildings back into productive use and therefore safeguard their future.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: allocation and proposal specific mitigation to encourage re-development and conversion proposals sensitive to the local built heritage context.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: our identified town centres are limited in number and boundary and have very few greenfield sites. Almost all development proposals will be conversions or re-developments of brownfield land.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>

POLICY 7: Industrial Land	
SEA Objective	<p>Our Policy: provides a clearer and stronger protection of existing industrial land and a more supportive framework for employment uses elsewhere.</p>
SEA Objective	<p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: more employment development, dependent upon its location, could have adverse effects on biodiversity.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: the suggested additional allocated employment sites should avoid significant residual adverse environmental effects. Where necessary developer requirements to safeguard and if possible enhance biodiversity have been added to these allocations. Windfall employment applications will be assessed against existing environmental legislation and policy safeguards.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: we will still support the separation of industrial and residential uses but support for live/work units and mixed use developments may lead to a minor increase in localised noise pollution with neighbours more affected than in the traditional residential only suburb. Conversely a more dispersed range of job opportunities may decrease the length of commuter journeys and the harmful emissions presently associated with such trips.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all employment proposals will still be subject to emissions controls regardless of where they are proposed but the imposition of Green Travel Plans for larger new employers could achieve net betterment relative to existing car dominated commuting.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: a more permissive approach to the location of new enterprises could result in more impact on soils but the additional, allocated employment sites have been assessed against this objective and some are on previously developed or already allocated land.</p>

	<p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: careful siting and layout can minimise soil disturbance.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: a more permissive approach to the location of new enterprises could result in more impact on flooding and the wider water environment but the additional, allocated employment sites have been assessed against this objective.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: careful siting and layout can avoid and if necessary mitigate any adverse impacts on flood risk and the wider water environment.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: a more dispersed pattern of jobs should disperse the air pollution effects of that activity and other things being equal reduce emissions in travel time to and from that employment. More mixing of employment and housing uses could increase nuisance to immediate neighbours but any effects should be localised.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: positive effects will depend upon more homeworking and matching other people's home and work locations so they are as close to each other as possible.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: a more dispersed pattern of jobs should other things being equal reduce emissions in travel time to and from work.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the preferred approach will depend upon workers and enterprises being willing to embrace new ways of travelling and working.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: a more flexible approach to where new enterprises can locate could have both positive and negative effects depending upon whether each enterprise reuses or minimises its own waste and heat resources and can tap into local spare capacity infrastructure networks.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: the Council will apply other general policies to all development proposals to ensure the most efficient use of all resources and network capacity.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: a more flexible approach to where new enterprises can locate could have both positive and negative effects on the historic environment depending upon the site-specifics.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: any rural or home working enterprises should be limited in scale and/or have a localised impact.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: a more flexible approach to where new enterprises can locate could have both positive and negative effects on the landscape depending upon the site-specifics.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: any rural or home working enterprises should be limited in scale and/or have a localised impact.</p> <p>Post mitigation score for policy: =</p>

POLICY 8: Placemaking	
SEA Objective	<p>Our Policy: provides a policy justification for requiring a developer to audit the impact of its application on the quality of the place, where it is proposed.</p> <p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: mainly neutral but better layouts would generally include better located, integral green spaces and green network connectivity so there may be indirect positive effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
2 Population and Human Health	<p>Likely effects of policy: mainly neutral but better layouts would generally include better active travel connectivity so there may be indirect positive effects for human health.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: mainly neutral but better layouts would generally include better located, integral green spaces and green network connectivity so there may be indirect positive effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
4 Water	<p>Likely effects of policy: mainly neutral but better layouts would generally address drainage, flood risk and the amenity value of water bodies early on in the process so there may be indirect positive effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: mainly neutral but better layouts should promote a shift to lower pollution travel modes.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
6 Climatic Factors	<p>Likely effects of policy: mainly neutral but better layouts should for example promote a shift to lower or zero carbon emission travel modes and incorporate climate change adaptation measures such as more naturalised surface water drainage infrastructure.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: the Audit includes heat, energy and other resource efficiency aspects and therefore there should be positive effects.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p>

	<p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
8 Cultural Heritage	<p>Likely effects of policy: mainly neutral but better layouts and architectural designs would include safeguarding and possible incorporation and enhancement of built and cultural heritage resources. Most optimistically, exemplar developments could become the conservation areas of the future.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: mainly neutral but better layouts and architectural designs should help safeguard urban landscapes.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>

POLICY 9: Delivering Development and Infrastructure	
SEA Objective	<p>Our Policy: seeks to ensure a more coordinated and timeous delivery of adequate infrastructure and community facility capacity in parallel with new development.</p>
	<p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>

4 Water	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: the policy seeks timeous and sufficient delivery of public greenspace, public sewerage, green networks, active travel networks and health facility capacity and therefore this infrastructure should be delivered sooner than it currently is for new development areas. However, this new provision is unlikely to remedy existing infrastructure deficiencies.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the policy is unlikely to have any direct effects on cultural heritage.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the policy is unlikely to have any direct, additional effects on landscape. Although additional greenspaces and green networks will be created these are likely to be at least part existing and will offer most benefits to the related development and localised area</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

POLICY 10: Increasing Affordable Housing	
SEA Objective	<p>Our Policy: proposes to: increase the quota to 35% for Inverness City (excluding the City Centre); require earlier private developer phasing of affordable units; and, support higher densities for affordable housing developments.</p> <p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

7 Material Assets	<p>Likely effects of policy: greater proportion of affordable housing within the earlier phases of larger housing sites could lever funding for infrastructure network improvements such as district heating schemes.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the preferred approach is about changing the type, tenure, density and timing of future housing development not its location and therefore it will have a neutral effect relative to the existing and other alternative approaches.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

POLICY 11: Self and Custom Build Housing	
SEA Objective	<p>Our Policy: introduces a quota for serviced plots for the largest (100 plus units) housing sites.</p>
	<p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p>

	Post mitigation score for policy: =
4 Water	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the policy will only affect the type of developer and potentially the timing, design, method and density of development not its location. As it only applies to a small part of large urban development sites then its separate environmental effects should be very limited.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

POLICY 12: Growing Settlements	
SEA Objective	<p>Our Policy: brings this policy into alignment with other recent adopted Highland area local development plans. The policy allows limited, small scale development within smaller, established settlements subject to the assessment of each proposal against a suite of criteria.</p> <p>Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.</p>
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
3 Soil	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p>

	Post mitigation score for policy: =
6 Climatic Factors	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the suite of criteria within the policy address potential heritage and other SEA Objective factors but likely effects are almost impossible to predict without knowing the proposal and site-specifics. Compliance with all criteria is not required by the policy.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: all the criteria are given equal weighting rather than additional significance being given to environmental effects. Other Plan policies may offer such additional significance depending upon the proposal and site-specifics.</p> <p>Post mitigation score for policy: =</p>

	POLICY 13: Accessible and Adaptable Homes
SEA Objective	Our Policy: introduces a quota for wheelchair liveable ground floor units on sites of 50 or more residential dwellings.
	Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the policy is unlikely to have any direct effects on biodiversity unless accommodating the ageing population means an increase in the total number of new housing units required or this accommodation is delivered on environmentally sensitive sites.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

2 Population and Human Health	<p>Likely effects of policy: the policy is intended to have a significant positive effect on the quality of life of residents able to enjoy such wheelchair liveable accommodation.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: the policy is unlikely to have any direct effects on soil.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: the policy is unlikely to have any direct effects on flooding or the water environment.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the policy is unlikely to have any direct effect on air quality.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
6 Climatic Factors	<p>Likely effects of policy: the policy is unlikely to have any direct effects on climatic factors.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
7 Material Assets	<p>Likely effects of policy: the policy is unlikely to have any direct effects on material assets.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
8 Cultural Heritage	<p>Likely effects of policy: the policy is unlikely to have any direct effects on cultural heritage.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the policy is unlikely to have any direct effects on landscape.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: there is no relevant mitigation for a neutral environmental effect policy.</p> <p>Post mitigation score for policy: =</p>

POLICY 14: Transport

Our Policy: directs developers to the most accessible sites and requires them to show that people using their development can travel as easily by walking, wheeling, cycling or public transport as they can by car.

SEA Objective	Alternative approaches considered: we have considered the continuation of existing Highland planning policies that affect this issue.
1 Biodiversity, Flora and Fauna	<p>Likely effects of policy: the policy is unlikely to have any direct effects on biodiversity. There may be indirect effects. Positively, a reduction in noise and pollution from car journeys may allow certain species to recover and thrive. Negatively, greater use of green networks for active travel could create disturbance to wildlife although proximity to nature can often increase human knowledge and appreciation of that heritage.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: =</p>
2 Population and Human Health	<p>Likely effects of policy: the policy will have positive effects on human health because more people will engage in active travel and air pollution will be reduced.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
3 Soil	<p>Likely effects of policy: the policy is unlikely to have any direct effects on soil because it seeks to influence how we travel. The transport facilities to encourage modal shift like EV charging points and Park n' Ride sites may have site-specific impacts but these will be picked up in site-specific developer requirements.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: site-specific developer requirements where necessary.</p> <p>Post mitigation score for policy: =</p>
4 Water	<p>Likely effects of policy: the policy is unlikely to have any direct effects on flood risk and the water environment because it seeks to influence how we travel. The transport facilities to encourage modal shift like EV charging points and Park n' Ride sites may have site-specific impacts but these will be picked up in site-specific developer requirements.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: site-specific developer requirements where necessary.</p> <p>Post mitigation score for policy: =</p>
5 Air	<p>Likely effects of policy: the policy is likely to have positive effects on the air topic through a reduction in noise and pollution from car journeys.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
6 Climatic Factors	<p>Likely effects of policy: the preferred approach is likely to have positive effects on climate change through a reduction in carbon emissions.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: successful implementation of the policy will depend upon its consistent application and enforcement.</p> <p>Post mitigation score for policy: +</p>
7 Material Assets	<p>Likely effects of policy: the policy is likely to have positive effects on material assets in terms of a switch to renewable energy to power travel.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: Redundant fuel networks such as natural gas pipes may have to be repurposed so as not to waste that existing infrastructure.</p>

	Post mitigation score for policy: +
8 Cultural Heritage	<p>Likely effects of policy: the policy is unlikely to have any direct effects on cultural heritage because it seeks to influence how we travel. The transport facilities to encourage modal shift like EV charging points and Park n' Ride sites may have site-specific impacts but these will be picked up in site-specific developer requirements.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: site-specific developer requirements where necessary.</p> <p>Post mitigation score for policy: =</p>
9 Landscape	<p>Likely effects of policy: the policy is unlikely to have any direct effects on the landscape because it seeks to influence how we travel. However, if the new active travel routes offer attractive views of the local landscape then they will increase both appreciation of that landscape and be more likely to encourage modal shift. The transport facilities to encourage modal shift like EV charging points and Park n' Ride sites may have site-specific impacts but these will be picked up in site-specific developer requirements.</p> <p>Likely effects of alternative approaches: a continuation of existing planning policies is unlikely to achieve any net betterment relative to the existing environmental baseline.</p> <p>Mitigation for policy: site-specific developer requirements where necessary.</p> <p>Post mitigation score for policy: =</p>

Assessment of Environmental Effects of Reporters' Recommended Modifications on General Policies

Following receipt of the Report of Examination we undertook an assessment of the environmental effects of the Modifications to the Plan's general policies recommended by the Scottish Government appointed Reporters. This assessment is summarised in the table below.

GENERAL POLICY	ASSESSMENT OF ENVIRONMENTAL EFFECTS
Transport Strategy and Policy (GP14)	The modifications bring the Plan's transport strategy and policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP1 Low Carbon Development	The modifications bring the Plan's policy into line with the latest changes to national building standards and National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP2 Nature Protection and Enhancement	The modifications bring the policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP3 Water and Waste Water Infrastructure Impacts	The modifications offer better cross referencing, clarity and reflect best practice and therefore will have only neutral and/or positive environmental effects.
GP4 Greenspace	The modifications bring the policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP5 Green Networks	The modifications bring the policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
Employment and GP6 Town Centre First	The modifications bring the policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP7 Industrial Land (including Renewable Energy)	The modifications offer better cross referencing, clarity and reflect the evolving situation with the Green Freeport project. The related site allocations contain sufficient developer mitigation requirement text to address potential environmental effects.
GP8 Placemaking	The modifications offer better cross referencing, clarity and, reflect current best practice and National Planning Framework 4. Therefore, they will likely have only neutral and/or positive environmental effects.

GENERAL POLICY	ASSESSMENT OF ENVIRONMENTAL EFFECTS
GP9 Delivering Development and Infrastructure	The modifications bring the policy into line with National Planning Framework 4 and therefore will likely have only neutral net environmental effects.
GP11 Self and Custom Build Housing	The modifications offer simplification and clarification. Therefore, they will likely have only neutral environmental effects.
GP13 Accessible and Adaptable Homes	The modification offers simplification and clarification. Therefore, it will likely have only neutral environmental effects.
GP15 Development Briefs	The modification simply deletes a potential use option. Therefore, it will likely have only neutral environmental effects.

7 Assessment of Development Site Options

How Have We Assessed Each Site?

In 2019, we invited development site suggestions as part of the Plan’s “Call for Sites”. Some of these were too small in scale to be included in the Plan (we are only identifying sites with capacity for 10 or more houses or a similar non-residential equivalent) and/or were too distant from any sizeable settlement – i.e. were in environmentally unsustainable locations relative to their size and proposed use.

Following this initial sieving process, each potential development site allocation was assessed against the following 10 environmental and socio-economic factors to determine whether it should be a preferred, alternative or non-preferred in the Main Issues Report and thereafter included (with appropriate mitigation) or not included in the Proposed Plan.

1. Water Environment
2. Climate Change
3. Biodiversity
4. Waste and Natural Resources
5. Landscape
6. Cultural Heritage
7. Sustainable Transport
8. Sustainability of Infrastructure
9. Placemaking
10. Delivery

The detailed list of site assessment questions and how we interpreted them in giving both pre and post mitigation scoring is contained in the Appendix to this Report. **The Appendix differentiates in red text those which are socio-economic. In summary, these are questions 34 (transport network capacity), 38 (school capacity), 40 (water and sewerage capacity) and 45-47 (viability).**

Assessment of Environmental Effects of Reporters’ Recommended Modifications on Development Sites

Following receipt of the Report of Examination we undertook an assessment of the environmental effects of the Modifications to the Plan’s development sites recommended by the Scottish Government appointed Reporters. This assessment is summarised in the table below.

SETTLEMENT/SITE	ASSESSMENT OF ENVIRONMENTAL EFFECTS
Alness	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Ardersier	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Auldearn	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Avoch	The modifications are either factual, relate to traffic management or will better safeguard greenspace. Therefore, they will only have neutral and/or positive environmental effects.
Beauly	The modifications are either technical, better safeguard allotment provision or will help support better active travel provision. Therefore, they will only have neutral and/or positive environmental effects.
Conon Bridge	The modifications increase housing development potential within the settlement which may have environmental effects. However, these potential effects have or will be assessed and suitable mitigation safeguard text has

SETTLEMENT/SITE	ASSESSMENT OF ENVIRONMENTAL EFFECTS
	been added to the Plan. Therefore, there should be no significant adverse residual effects from the changes.
Cromarty	The modifications delete an allocation (CM03) that could have had adverse environmental effects and add support for a sustainable travel mode transport connection. Therefore, they will only have neutral and/or positive environmental effects.
Dingwall	The modifications delete (DW04), reduce and/or add more onerous environmental safeguards to the Plan's allocations. Therefore, they will likely only have neutral and/or positive environmental effects.
Dores	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Drumnadrochit	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Evanton	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects. The modifications to indicative housing capacity do not increase the overall capacity of sites.
Fortrose and Rosemarkie	The addition of an archaeological developer requirements will likely only have a neutral and/or positive environmental effect.
Invergordon	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects. Any potential additional effects by development outwith site IG05 are addressed by augmented developer requirement text.
West Inverness	<ul style="list-style-type: none"> • The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects. • The Reporter's deletion of the previous requirements was based upon the correct assumption that the allocation will not support built development of any scale or impact. The change will likely only have neutral environmental effects. • The modification is intended to better safeguard environmental interests and should therefore only have neutral and/or positive environmental effects. • The Reporter's amendment of the previous requirements was based upon the correct assumption that any proposed development will have different, very minor impacts. The change will likely only have neutral environmental effects.
South Inverness	The modifications delete (INS15), reduce and/or add more onerous environmental safeguards to the Plan's allocations. Therefore, they will likely only have neutral and/or positive environmental effects.
Central Inverness and City-wide	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects. Any potential additional effects by development outwith site INC06 are addressed by augmented developer requirement text.
	The deletion relating to foul drainage and surface water discharges was only to avoid duplication within the developer requirements. Otherwise, the modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
East Inverness	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Kiltarlity	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Kirkhill	The modification adds a new housing site at Achnagairn which may have environmental effects. However, these potential effects have or will be assessed and suitable mitigation safeguard text has been added to the Plan.

SETTLEMENT/SITE	ASSESSMENT OF ENVIRONMENTAL EFFECTS
	Therefore, there should be no significant adverse residual effects from the change.
Maryburgh	The modifications are technical or better address potential adverse environmental effects (e.g. delete MB02 which may have had adverse environmental effects). Therefore, they will likely have neutral and/or positive environmental effects.
Muir of Ord	The modifications are technical or better address potential adverse environmental effects. Therefore, they will likely have neutral and/or positive environmental effects.
Munlochy	The modifications are technical or better address potential adverse environmental effects. Therefore, they will likely have neutral and/or positive environmental effects.
Nairn	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects (e.g. delete NA05 which may have had adverse environmental effects).
North Kessock	The modifications will better address potential adverse environmental effects. Therefore, they will likely have neutral and/or positive environmental effects.
Seaboard Villages	The modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Strathpeffer	Not applicable.
Tain	<ul style="list-style-type: none"> • The modifications delete the sites TN03-TN06 from the Plan partly for environmental effects reasons and amends the settlement development area boundary, so the land is no longer within it. • The new site at Knockbreck is an existing site allocation in the adopted Inner Moray Firth LDP and also featured in the Main Issues Report. An SEA site assessment was completed for the Main Issues Report and consulted upon. The developer requirements set out in the modifications will address any potential environmental effects. • Otherwise the modifications are factual, explanatory or where material will only have neutral and/or positive environmental effects.
Tomatin	The modifications are technical or will only have neutral and/or positive environmental effects.
Tore	One modification is technical and the other deletes a development site (TR02) with potential adverse environmental effects. Therefore, they will likely have neutral and/or positive environmental effects.
Tornagrain	The modifications are technical or better address potential environmental effects and will therefore likely only have neutral and/or positive environmental effects.

SETTLEMENT/SITE	ASSESSMENT OF ENVIRONMENTAL EFFECTS
Economic Development Areas	<ul style="list-style-type: none"> • The modification (HD01) to change the mix of uses reflects what is currently in the adopted Inner Moray Firth LDP. These additional uses of business and infrastructure are generally more benign in terms of environmental effect than industry and as such will likely have neutral environmental effects. • Any potential additional effects by development outwith site NG01 are addressed by augmented developer requirement text. • The modification (IA01) better safeguards against potential adverse environmental effects and will likely only have neutral and/or positive environmental effects. • The modifications (IA02) reduce the extent of the allocation and restrict the use of the site and therefore will likely have neutral environmental effects. • The modifications (WH01) better safeguard against potential adverse environmental effects and therefore will likely only have neutral and/or positive environmental effects. • All other modifications are factual, technical or where material will only have neutral and/or positive environmental effects.
Growing Settlements	The modifications better address potential flood risk and therefore will likely have neutral and/or positive environmental effects.

The Results of Our Assessment

The full results for all sites are available online at 'highland.gov.uk/imf' (click on the background documents link). These are searchable via a map to make it easier for those only interested in a particular site or locality to find the results most relevant to them.

How Has SEA Influenced Our Development Site Choices?

For those interested in the whole of a settlement then the following section explains how SEA considerations have influenced our development site choices for each place. This is the best scale at which to understand how difficult choices were made. Very few potential development sites are totally free of environmental and other constraints and often a final decision is a compromise between several competing factors. **References to socio-economic factors are highlighted under a different specific sub heading to ensure clear separation from consideration of environmental effects.** Our aim in this section is to explain and be more transparent about how we reach a professional holistic judgment in balancing all these factors. Flooding issues are singled out because the Council committed to take a more strategic approach to flood risk assessment. Flooding problems and solutions are often catchment wide and therefore looking at one site in isolation rarely identifies all the sources of a flooding problem or a comprehensive solution. We regard this section of the Report as the Council's Strategic Flood Risk Assessment of the Plan. A list of current Flood Risk Management Plans and Schemes can be accessed [via the Council's website](#).

Alness

Assessment Against Flooding Issues

There is potential flooding identified along Alness River, Contullich Burn and Achnagarron Burn as well as potential coastal flooding for land south of the A9. There are also small areas of potential flooding identified across the town. For any sites potentially affected mitigation has been included asking for a Flood Risk Assessment and stating that no development should happen on areas identified at risk.

Assessment Against Other SEA Issues

There are lots of Core Paths around Alness, particularly around Alness River, Coulhill Wood and at the coast adjacent to Alness Point. None of the Core Paths should be adversely impacted by any of the chosen sites but

mitigation has been included where appropriate for linkages to be provided to existing core paths for both active travel and recreational purposes. National Cycle Route 1 also passes through the town. There are TPOs along Contullich Burn which are not impacted by any sites. There is also one around Teaninich House which is adjacent to a preferred allocation for mixed use. Mitigation has been included that development and construction should ensure no impact on the woodland and in particular the roots. Coulhill Wood is native woodland and is adjacent to and forms part of allocations at Darroch Brae. Mitigation is unlikely to avoid significantly affecting the woodland interests however compensatory planting would be required. There is also native woodland at Crawl Park which is not impacted by any sites. SPA, SAC, SSSI and Ramsar designations at the Cromarty Firth are adjacent to land allocated at Alness Point. Alness Point is an established Business Park with capacity for six additional sites for employment opportunities. There is potential for significant effects on the integrity of the sites depending on construction timing and methods. Appropriate mitigation has been included. Prime agricultural land can be found at the southern half of Alness East, Darroch Brae, Obsdale and south of the A9.

Assessment Against Socio-Economic Issues

In the settlement hierarchy Alness is classed as a tier 1 settlement and as such is one of the most suitable locations for growth. It is a key service and employment centre and Alness Academy has also been recently upgraded. Housing growth is focused at the eastern side of the town, in an area known as Alness East. Active travel links to the town are however poor with missing footpaths and narrow roads and as part of wider mitigation it is considered imperative that a masterplan approach is taken for the wider expansion area which could deal with issues such as active travel. For Alness East to expand in the longer term it is very likely that a new/upgraded junction will be required onto the A9 as the existing junction at Rosskeen is not suitable for large amounts of traffic. There are also some housing sites which are actively being developed – Whitehills, Dalmore and Willowbank Park – and these are being shown as short term sites.

Ardersier

Assessment Against Flooding Issues

Expansion options in Ardersier are limited due to its coastal location and risk of coastal flooding to the north and fluvial flooding to the south.

Assessment Against Other SEA Issues

The land to the west slopes steeply upwards and the flatter land above is exclusively prime agricultural farmland. The main vehicular accesses into the village converge to a single, narrow road (High Street) which leads to traffic congestion. The Milton of Connage Farm provides a logical southern settlement edge and provides an attractive entrance from the B9039. As an old fishing village, Ardersier has a rich built heritage with several listed buildings and conservation area. Scheduled monuments are located at the north and south of the settlement.

Assessment Against Socio-Economic Issues

A major new housing development is underway on the land adjoining the existing housing estate at the south east of the village. This is likely to address local housing needs for many years to come. The local primary school is expected to need an extension but has capacity to expand to accommodate further settlement growth, however, Culloden Academy is forecast to experience significant capacity pressures over the coming years. A new secondary school in Inverness is planned but funding has not been secured. Limited employment opportunities exist within Ardersier and active travel and public transport to Nairn and Inverness are far less competitive than private vehicle.

Auldearn

Assessment Against Flooding Issues

Small watercourses to the north and west pose fluvial flood risk to certain areas of land adjoining Auldearn.

Assessment Against Other SEA Issues

The main constraints are the A96 trunk road to the north and the Auldearn Battlefield designation which covers most of the village and the land surrounding it. The logical expansion sites which would round off or infill Auldearn either do not have landowner/developer interest or are potentially constrained by poor access

arrangements. Other sites proposed would elongate the settlement, have a greater landscape impact or affect areas of prime agricultural land. Just one, consolidation, development site is proposed

Assessment Against Socio-Economic Issues

Auldearn is a relatively small village with services limited to shop, restaurant and a primary school which is currently over capacity and the roll is expected to increase further. With a major housing development recently completed at Montrose Avenue, and the lack of facilities, there is no pressing need for significant housing allocations at present.

Avoch

Assessment Against Flooding Issues

Coastal and fluvial flood risks limit potential settlement expansion options and the combined sewer system within the heart of the old village creates network capacity including potential sewer flooding issues. The only preferred allocation with known risks is the harbour where only harbour related uses will be supported. The steeply sloping, peripheral potential development sites are not included for a variety of reasons including their uncertain foul and surface water drainage provision.

Assessment Against Other SEA Issues

The growth of the settlement is limited by a range of physical and environmental constraints. The central conservation area and the wooded margins (including the Designed Landscape at Rosehaugh) of the village also constrain growth. Given the above, we have chosen not to promote significant growth in this settlement. Instead, we believe that existing planning permissions and land allocations should be completed but no new land identified for development. Land at Muiralehouse is the least constrained land that lies closest to the village's community and commercial facilities. We have rejected new sites suggested at Cemetery Hill and East of Knockmuir because they raise visual and landscape impact issues as they are elevated and exposed, and unlikely to encourage active travel to the village's community and commercial facilities. We have also rejected the suggested site at Rosehaugh East Drive because it has woodland constraints and is marginally further from village facilities than confirmed site AV01.

Assessment Against Socio-Economic Issues

The local primary school is already over capacity. Perhaps most importantly, Avoch is served by a spine road (the A832) which has capacity and safety issues. The harbour site has a locational imperative to be where it is - i.e. will allow improvement of an existing facility. Employment uses are confirmed at Muiralehouse rather than south of the village because of access constraints at the latter. Site AV01 has current developer interest. The new sites suggested at Cemetery Hill and East of Knockmuir were also rejected because they are accessed via single track roads with poor alignment. Given the above, we have chosen not to promote significant commuter/holiday accommodation growth in this settlement.

Beaully

Assessment Against Flooding Issues

Beaully has fluvial, pluvial (much smaller open ditch watercourse) and groundwater flooding constraints. We have not allocated any development sites below the 5m AOD contour to avoid the fluvial risk. We have suggested mitigation such as development setbacks to address the pluvial risks where allocations contain or are bordered by field ditches. Also, we have preferred the land with the most elevation (and presumed ground water clearance) for the settlement's principal expansion area.

Assessment Against Other SEA Issues

Beaully has a good range of community and commercial facilities, employment opportunities and the sustainable travel advantage of a rail halt. We believe that these factors and the abundance of reasonably flat and reasonably well drained land close to central facilities make it an ideal location for growth. However, there are physical and environmental constraints that should be respected. Taking account of these we have supported the continued expansion of Beaully but in a compact form. Relieving central congestion and pollution should also benefit the historic village square and its Conservation Area. We intend that, other things being equal, compact mixed use development will encourage active travel because there will be the opportunity to walk or cycle to local employment and local facilities.

Assessment Against Socio-Economic Issues

Beaully is an economically viable location for future growth. However, there are service capacity constraints that should be respected. The Village Square and the central road network were not designed for a high level of vehicle traffic. Similarly the primary school accommodation is outdated. Taking account of these we have supported the continued expansion of Beaully but in a compact form and hand in hand with improvement to local facilities notably extension of the "Priory Way" loop road that will relieve pressure on the narrowest central road network and new accommodation at and close to the primary school. Business development is directed as close as possible to the town centre to bolster footfall and to the rail station where certain uses may gain a competitive advantage from that connected location. We have favoured land in north Beaully ahead of that either side of Croyard Road because it appears more viable in terms of ownership and developer interest.

Conon Bridge

Assessment Against Flooding Issues

Conon Bridge has significant fluvial flood risk issues from several watercourses. Our site choices have taken account of these issues by a mixture of not supporting a site containing watercourses (Schoolhouse Belt) or specifying and suggesting mitigation (a development setback for development at Braes of Conon and a flood protection scheme dependency for the Drouthy Duck and Pescanova sites). The Reporter's addition of a development site allocation at Riverford was made with suitable developer requirement mitigation text added regarding avoidance of flood risk. The Reporter also strengthened the flooding developer requirement text for the former petrol filling station site.

Assessment Against Other SEA Issues

Other than flooding issues, Conon Bridge has fewer constraints than many other settlements. It has a rail halt and no public sewerage capacity constraints. However, other factors indicate that that growth should be tempered for example the settlement's generally northwesterly aspect is poor in terms of solar gain potential. Land at Braes of Conon has the sustainability benefit of lying close to the primary school and principal village shop. We have tried to favour redevelopment of central brownfield sites rather than the better agricultural land albeit contamination risk issues affect the potential of the former. The additional Riverford site is accompanied by suitable developer requirement mitigation text to address other potential environmental effects.

Assessment Against Socio-Economic Issues

Conon Bridge has trunk road connectivity, a rail halt, no water and sewerage capacity constraints and a plentiful supply of viable development land. However, other factors indicate that that growth should be tempered and phased in step with infrastructure capacities. The local primary school that also serves Maryburgh residents is over capacity. Land at Braes of Conon is most viable with serious and current developer interest. The additional Riverford site was thought to be constrained in ownership terms but this has been overcome and a planning permission granted. It is closer to the rail halt than other alternatives and more distant from the A835 junction constraint.

Cromarty

Assessment Against Flooding Issues

Cromarty, although coastal has few coastal development sites available for consideration and therefore this isn't a significant issue. Similarly, there are no pronounced pluvial or small watercourse issues affecting the handful of suggested development sites.

Assessment Against Other SEA Issues

Cromarty's peripherality, raised beach physical constraint and built heritage quality have all led us to allocate very few development sites. We believe it would be imprudent to encourage car based commuting from the town because of the length and carbon impact of car journeys. Also, the town's sewage works has very little spare capacity. Land at Sandilands is the best candidate for expansion because of its centrality and visual containment but has access and landownership issues. Because of this we have included the suggested development site above Cromarty's escarpment but with mitigation to offset its landscape sensitivity and lack of current active travel links to the town's facilities. The Reporter's subsequent deletion of the South of Manse site removes the potential adverse landscape and visual effects of this site.

Assessment Against Socio-Economic Issues

Cromarty's lack of local employment opportunities and village centre congestion issues along the A832 suggest it is not suitable for significant growth. The other confirmed development site is for a dedicated campervan site to better manage and divert demand for that type of overnight accommodation from the Links area.

Croy

Assessment Against Flooding Issues

There are no significant flood risk concerns in or around Croy.

Assessment Against Other SEA Issues

Expansion to the south is undesirable due to the large, continuous strip of ancient woodland. The housing on the southern edge of Croy faces inwards, away from the adjoining B9091 which results in it being a fast road and a barrier to development. The village scores relatively poorly from a sustainability point of view with a lack of employment opportunities, limited public transport options, distant from key facilities and the primary school under pressure. Permission for 100 houses has been granted on land to the south of Croy and development is underway. The developer has put forward that a second phase that could be delivered on land immediately to the north west. We are confirming this land although recognise it is prime agricultural land. We rejected land proposed to the east as it's poorly connected to the existing settlement both physically and visually.

Assessment Against Socio-Economic Issues

Over the past 10 years or so, Croy has experienced significant growth in relation to its size. Whilst the confirmed sites do not have unsurmountable constraints, the lack of capacity in the primary school, limited facilities in the village and its disconnect to main urban and employment centres leads to Croy performing very poorly from an overall sustainability perspective.

Culbokie

Assessment Against Flooding Issues

Culbokie has few flood risk issues because of its distance from the coast and lack of sizeable watercourses. Most subsoils allow within curtilage infiltration and the sewerage network is adequate.

Assessment Against Other SEA Issues

However, Culbokie's primary function is as a dormitory village of around 650 people many of whom are employed in Inverness and Easter Ross. Without effective non car accessibility to these jobs, it is not a sustainable location for further growth. Culbokie's elevation and generally northwesterly aspect present a relatively poor microclimate and its extended linear pattern makes within village active travel less likely. Taking account of these development factors we have only confirmed completion of already permitted sites, a brownfield redevelopment opportunity and completion of established infill sites. Sites CU01 and CU03 benefit from planning permission and provide for a mix of uses in a location as close as possible to the centre of the village. Land adjoining the old primary school is previously developed and underutilised.

Assessment Against Socio-Economic Issues

The local population is declining and it would not be cost effective to promote more sustainable travel from this location. Moreover central land is unavailable for development.

Dingwall

Assessment Against Flooding Issues

Dingwall has potential pluvial and coastal flooding issues. The Council has assumed that flood scheme / alleviation works adjoining the Business Park will mitigate risks at that location in confirming allocations there. There is a new site identified at Craig Road for community use. The site is at risk of coastal flooding however it is considered that it's use as park area could be achieved despite the flood risk. Housing uses that were suggested around the riverside area via the Call for Sites were rejected due to flood risk. The Reporter deleted the Docharty Road East allocation in part because flood risk affects the developable area.

Assessment Against Other SEA Issues

Dingwall has a Conservation Area and there are several listed buildings within it, however there are no site allocations near it. Sites on the eastern side of the town in particular Dingwall Riverside North and Craig Road are within close proximity of the Cromarty Firth SPA, SSSI and Ramsar. Where appropriate recreational management plans and the retention and protection of trees with adequate separation from development, are being provided as possible mitigation. Native woodland, much of which is covered by TPOs, is prevalent around Dingwall North and between the A862 and the shoreline. Mitigation has been included for sites to retain and protect boundary trees and ensure adequate separation between woodland and any development. Additional development on land adjacent to the Old Evanton Road has been rejected partly because it is prime agricultural land. The Reporter deleted the Docharty Road East allocation in part because of potential woodland loss.

Assessment Against Socio-Economic Issues

Within the settlement hierarchy Dingwall is classed as a tier 1 settlement suitable for larger amounts of growth and considered most sustainable in terms of services and employment opportunities and public transport routes available. There is a Primary and Secondary School however both are requiring major extensions and developer contributions will reflect this. Expansion at Dingwall North has been constrained by the need to deliver import transport infrastructure. However, this area is the chosen future direction of growth for housing and the identification of the preferred sites in Dingwall North should enable progress with closing the gap on two sections of the road which would link Docharty Road and Old Evanton Road, providing a possible circular route for public transport.

Dores

Assessment Against Flooding Issues

Whilst the extent of flood risk is relatively small across Dores, small watercourses run through the main gap site in the centre of the village and to the north.

Assessment Against Other SEA Issues

Dores is nestled between Loch Ness and the steep, wooded hill side which adjoins it. This means that development options are limited with most sites experiencing topography or woodland constraints. There is also a lack of active travel provision on the B roads to the south. Dores scores poorly from a sustainability point of view as there are few local facilities, it's a long distance to walk or cycle to Inverness and the school is detached from the village. For these reasons, we are limiting development opportunities unless they are linked to improvements to facilities.

Assessment Against Socio-Economic Issues

Dores is identified within Tier 4 as there are very limited facilities within the settlement and an infrequent bus service is the only public transport option available to Inverness. The primary school is also detached from the village. The deliverability of the chosen sites is in doubt due to issues related to landownership, topography, flood risk and tree cover. Land south of the church is the most viable and sustainable as there is developer interest and it is the most central to the village and its facilities. The other confirmed site south of the village hall is only included subject to significant mitigation.

Drumnadrochit

Assessment Against Flooding Issues

Drumnadrochit has significant fluvial flood risks from two principal watercourses. A flood protection scheme is proposed for the River Enrick which will protect parts of the settlement and as an indirect consequence one of the development sites confirmed. Another site, closer to Milton was rejected primarily for flood risk reasons.

Assessment Against Other SEA Issues

Drumnadrochit has the sustainability benefits of a range of facilities beyond what would be expected for the size of the settlement even including its wider Glenurquhart catchment population. However, it is not a sustainable location for significant further growth. Car based travel to larger facilities and work is still necessary. Add in the physical constraints of the steep surrounding hill slopes, and the environmental and amenity benefits of preserving local greenspace then we believe that a cautious approach to future growth is

sensible. Therefore we have only supported "legacy" allocations at Drum Farm and adjoining the new Co-op store but not included the suggested new expansion area to the rear of the health centre.

Assessment Against Socio-Economic Issues

Improving public transport or active travel provision to Inverness would not be cost effective relative to the extra population that could reasonably be accommodated in Glenurquhart. Similarly, local water and sewerage capacity is constrained and additional investment to increase capacity is not programmed by Scottish Water. Add in the restrictions on new access to the A82 trunk road and significant new growth is not appropriate. Other than the sites above, expansion of shinty facilities would most sensibly be made adjoining the existing pitch and underutilised land closer to the high and primary schools may have potential for complementary education or other community use.

Evanton

Assessment Against Flooding Issues

There is potential for flooding along the River Sgitheach and this is reflected in the assessment of the wider site at Teandallon. There is also some potential for some surface water flooding at Culcairn which was one of several factors in its rejection. Flood Risk Assessment mitigation has been added and no development should happen on areas shown to be at risk of flooding.

Assessment Against Other SEA Issues

The rejected land at Culcairn is classed as prime agricultural land as is the northern half of the site confirmed at Teandallon. A small straightened watercourse runs through Teandallon and mitigation is being suggested that it should be restored to a more natural route. At Teandallon there are also trees on the southern boundary which are flagged for protection and other mitigation.

Assessment Against Socio-Economic Issues

In the settlement hierarchy Evanton is classified as a tier 2 settlement, considered a sustainable location suitable for modest amounts of growth. Whilst bus services are available and there is a desire to re-open the rail halt, for most residents the use of a private car is still necessary. If a rail halt were to be provided it would potentially allow further growth of the village but without it, growth should only be modest. Evanton provides a number of services and also a Primary School and is well located in terms of access to strategic employment centres. It is unlikely that a district heat network would be economically viable as there is no high anchor load and high concentrated heat demand. Development at Teandallon will provide improved active travel links into the centre of the village. Culcairn was rejected partly because it is slightly more remote from the village centre amenities and the Primary School.

Fort Augustus

Assessment Against Flooding Issues

Fluvial flood risk affects the lowest part of the settlement but most potential development sites are at a higher level so flood risk hasn't been a determining factor in our site choices.

Assessment Against Other SEA Issues

Fort Augustus has other sustainability benefits. Even though it only accommodates a stable, year round population of just over 600 it expands during the tourism season because it is well placed to capture trade passing along its trunk road, canal and long distance trail corridors. It also supports higher order facilities such as a high school because of its distance from any urban area. However, the same transport, river and tourism corridors create severance of active travel and other movement across the village, junction constraints, and built heritage features that should be protected. Land within and adjoining the village car park is in the most sustainable location and could be reconfigured to allow more and better laid out car parking plus enabling mixed use development. We believe tree loss issues can be mitigated by compensatory planting provision. We believe that any remaining development potential at the Abbey should be limited because of its heritage constraints and therefore this site is not reallocated.

Assessment Against Socio-Economic Issues

Education, water and sewerage facilities have adequate existing or programmed capacity. Property interests have dictated viability and therefore our site choices. The patchwork ofcrofting tenancies and ownership within the village continues to thwart attempts to assemble larger development sites and therefore we are only supporting consolidation rather than seeking to promote expansion of Fort Augustus. Land south of the Old Convent is already part developed, subject to developer interest and could be extended without adverse effects.

Fortrose and Rosemarkie

Assessment Against Flooding Issues

Fortrose and Rosemarkie, although coastal have few coastal development sites available for consideration and therefore this isn't a significant issue. Similarly, there are no pronounced pluvial or small watercourse issues affecting the handful of suggested development sites although land at Greenside Farm did raise issues that were addressed at planning application/permission stage.

Assessment Against Other SEA Issues

Despite its combined size of around 2,350 permanent residents, its role as a "town centre" for a larger rural hinterland, and higher order facilities such as the Academy and Leisure Centre, these settlements are not an environmentally sustainable location for further significant growth. Add in prime agricultural land, steep inland slopes and heritage constraints then the justification for constraint is even more pronounced. Accordingly, we have only chosen sites that were previously allocated and/or where a planning permission has been issued.

Assessment Against Socio-Economic Issues

Fortrose and Rosemarkie are not an economically viable location for further significant growth. All of the eastern Black Isle settlements are primarily served by the A832 spine road, which in passing through the constricted historic cores of those settlements results in congestion and other related issues. Moreover, the length of this connection and the existing and potential catchment population served means that it will not be cost effective to improve non car accessibility to the eastern Black Isle. Fortrose and Rosemarkie have very limited additional waste water treatment capacity and both its high and primary schools are near or over capacity.

Invergordon

Assessment Against Flooding Issues

Despite its coastal location, Invergordon does not experience significant flood risk issues. Land around the northern sides of the town act as floodplains for the small watercourses at Tomich and Broomhill but the land does not form part of the confirmed sites. Most subsoils allow within curtilage infiltration and the sewerage network is adequate.

Assessment Against Other SEA Issues

In terms of other environmental factors, site choices for Invergordon have largely been influenced by the presence of prime agricultural land (including sites at the House of Rosskeen and north of Invergordon Mains), relatively limited active travel connections and distance from key facilities (including land north of Saltburn). Potential land contamination issues exist on several sites and will require developer requirements for further assessment and mitigation.

Assessment Against Socio-Economic Issues

Invergordon benefits from a wide range of services and facilities, including primary and secondary schools, hospital and shops, and has a strong employment base. However, residential development pressure remains low, which is reflected in the decline in population since the last census and the reduction in the number of sites being confirmed.

Inverness City

Assessment Against Flooding Issues

The coastal location of the City combined with the presence of the River Ness and Caledonian Canal mean that a range of flooding issues are present across the city. These are particularly pronounced along the northern coastal edge where coastal flood risk presents issues for existing built-up areas and limits potential future development. Similarly, land along the banks of the River Ness is subject to fluvial flood risk. Work in recent years on the River Ness Flood alleviation scheme has addressed risk to existing properties. Future development along this blue corridor will be limited, confirmed land at Inverness Harbour will only be acceptable for certain more vulnerable uses if a comprehensive assessment of flood risk, and biodiversity impacts, can be presented. Elsewhere, there are areas of pluvial and fluvial flood risks due to man-made interventions, like the banks of the Caledonian Canal. Risks at Inverness East are to a degree being mitigated by Council-led schemes such as the Culloden and Smithton Flood Alleviation Scheme. For sites that are identified as being at risk of flooding, assessment and mitigation measures are included as developer requirements within the Plan.

Assessment Against Other SEA Issues

Major expansion of the City proposed at Fairways Golf course and Welltown of Leys has been rejected due to the potential adverse impacts on Climate Change as a result of increasing the amount of people that would be dependent on unsustainable, carbon-intensive and car-based modes of transport for everyday journeys. Plus these sites would likely have significant adverse impacts on landscape and visual amenity and on the City's character. Instead, a range of infill and consolidation sites have been confirmed notably completion of existing City expansion areas because they have a range of permissions, where SEA factors have been identified and mitigated and/or the sites present sustainable, effective and lower impact options that will meet the City's development needs over the next 20 years. The Reporter deleted the Sir Walter Scott Drive housing allocation in part because of the net loss of greenspace that would have resulted.

Assessment Against Socio-Economic Issues

Pressure for housing land in the City remains a major challenge and priority for the Council. The majority of demand for housing, across the range of tenures, is in Inverness. The Plan identifies a range of effective sites with willing landowners to take forward development to tackle this challenge. Major infrastructure investment such as the East Link Road will support the development of these sites. Access to green and blue infrastructure for physical and mental wellbeing is recognised in the Plan and these areas are properly identified and safeguarded as well as the development sites.

Kiltarlity

Assessment Against Flooding Issues

Most confirmed development sites are not subject to mapped fluvial flood risk except the Old Mill site which is addressed via development setback mitigation. Otherwise most of the sites are free draining and therefore should be suitable for within curtilage infiltration drainage.

Assessment Against Other SEA Issues

However, in wider sustainability terms Kiltarlity parish's main settlement at Allarburn has a dormitory function. Local employment opportunities, commercial facilities and public transport connectivity are all very limited. Accordingly, our chosen sites only include completing sites that already benefit from allocation in the existing development plan and/or have planning permission plus a necessary cemetery extension. The Old Mill is a brownfield redevelopment opportunity that could provide local opportunities. Otherwise, the larger suggested sites have been rejected because they would breach servicing and landscape capacities, and increase car based travel.

Assessment Against Socio-Economic Issues

With an immediate village population of around 470, a constrained local road network and limited water supply and waste water treatment capacity, the settlement cannot support major future development without a similar increase in public investment and that level of investment would not be cost effective relative to investing in other areas. Land at and near Glebe Farm is preferred because it is part developed, part serviced and close to the local primary school.

Kirkhill

Assessment Against Flooding Issues

The confirmed development sites are not subject to mapped fluvial flood risk and Drainage Impact Assessment mitigation is added to address any surface water drainage issues although most of the sites are free draining and therefore should be suitable for within curtilage infiltration. The Reporter's addition of a development site allocation at Achnagairn was made with suitable developer requirement mitigation text added regarding watercourse setback.

Assessment Against Other SEA Issues

However, in wider sustainability terms, Kirkhill has a largely dormitory function with local employment opportunities, commercial facilities and public transport connectivity all very limited. As such it is not a sustainable location for significant further growth. As such, we believe future development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. Land at Groam Farm is close to the local primary school. The builder's yard is central to the community, has been underutilised for several years and would therefore benefit from redevelopment. Other sites have been rejected because they are more distant from the settlement's facilities and would therefore not encourage active travel. The Reporter's addition of a development site allocation at Achnagairn was made with suitable developer requirement mitigation text added regarding tree survey, tree setback and active travel connectivity improvements.

Assessment Against Socio-Economic Issues

Kirkhill's side road network is constrained, its primary school over capacity and its water supply and waste water treatment capacity limited. As such, the settlement cannot support major future development without a similar increase in public investment and that level of investment would not be cost effective relative to investing in other areas. Land at Groam Farm is close to the local primary school and is already part serviced. Other sites have been rejected because they have deliverability as well as environmental issues.

Maryburgh

Assessment Against Flooding Issues

Most of the prospective development sites are not subject to mapped fluvial flood risk but there are some that contain watercourses that will need to be addressed via development setback mitigation. The presence of multiple watercourses within MIR site MB05 was one factor in most of it not being confirmed.

Assessment Against Other SEA Issues

In wider sustainability terms, Maryburgh is a dormitory settlement that has lost population and facilities. More positively, water and sewerage capacity is adequate to support further growth. Therefore, we haven't supported significant future growth at Maryburgh. We have allocated a few smaller sites for housing development. The upper slopes of land above the Maryburgh Roundabout are sensitive in visual and landscape impact terms and are therefore not supported. The Reporter deleted the allocation at Birch Drive in part because of likely net adverse effects on the tree/woodland resource.

Assessment Against Socio-Economic Issues

Positively, landowners are prepared to make land available and there are few physical constraints that would inhibit development. Unfortunately, the road network leading to the peripheral expansion site options is single track and difficult to widen in terms of third party landowner dependency. Therefore, we haven't supported significant future growth at Maryburgh. We have preferred the most central sites apart from land close to the Maryburgh A835 roundabout which we believe offers competitive advantage as an employment site because of its visibility and good road connections.

Muir of Ord

Assessment Against Flooding Issues

Most of the prospective development sites are not subject to mapped fluvial flood risk but there are some that contain watercourses which has been via development setback mitigation. The potential site at Highfield was rejected partly because of watercourse issues.

Assessment Against Other SEA Issues

Muir of Ord is an environmentally sustainable location for further significant growth. Crucially, Muir of Ord also has a good range of local facilities, local employment opportunities and an improving rail service connection. Because of these factors we have chosen to reallocate the majority of previously identified allocations. Central land should be safeguarded for enhanced community facilities with better connections to adjoining housing areas. We wish to safeguard and expand local employment opportunities at the distillery and industrial estate. The latter site will lead to tree loss and in recognition of this we have suggested compensatory planting mitigation.

Assessment Against Socio-Economic Issues

Muir of Ord is an economically viable location for further significant growth. Unusually for a Highland settlement it has plentiful, relatively flat and relatively well drained land. Similarly, the town has few infrastructure constraints - water, sewage treatment and school capacities are adequate. Crucially, Muir of Ord also has a good range of local facilities, local employment opportunities and an improving rail service connection. Because of these factors we have chosen to reallocate the majority of previously identified allocations except at Broomhill and Ord Hill where the previous permissions are almost complete and at Corrie Road where land has not come forward for development. We wish to safeguard and expand local employment opportunities at the distillery and industrial estate. The latter site will lead to tree loss and in recognition of this we have suggested compensatory planting mitigation.

Munlochy

Assessment Against Flooding Issues

The lower lying sites are affected by watercourse flood risk and we have added development setback mitigation to the central site that has already got a minded to grant planning application decision to address this issue. The other flood risk affected sites have been rejected for a variety of reasons including flood risk.

Assessment Against Other SEA Issues

Munlochy has a primarily dormitory function with commuter housing pressures. Munlochy lacks sufficient local employment opportunities or good enough public transport connectivity to make it a sustainable location for further growth. Taking account of this we have constrained future development potential to the completion of existing allocated and permitted sites. Redevelopment or refurbishment of the transport facility at ML04 should lead to a net environmental improvement.

Assessment Against Socio-Economic Issues

Munlochy has a primarily dormitory function with commuter housing pressures created by the settlement's location close to major work centres and its attractive outlook towards Munlochy Bay and a surrounding wooded countryside. Servicing capacity is also good with water supply, sewage treatment and education provision all capable of accommodating limited expansion. However, it is also a village that straddles a busy road that acts as a through route for other commuter traffic travelling to and from a large part of the Black Isle. Side road capacity is also limited. Taking account of these development factors we have constrained future development potential to the completion of existing allocated and permitted sites.

Nairn

Assessment Against Flooding Issues

Nairn is subject to both coastal flood risk at Fishertown and fluvial flood risk from the River Nairn. Large areas of land around the Firhall, Househill and Crook form important flood plains which need to be protected. Heavy rainfall has potential for surface water urban drainage, agricultural run-off, combined sewer overflows and treated sewage effluent to cause water pollution. Scottish Water and SEPA jointly commissioned a study which found a combination of sources affecting water quality at Nairn, mainly agricultural run-off upstream. Scottish Water are actively upgrading and maintaining infrastructure to minimise adverse impacts during peak times. Confirmed allocations avoid these risk areas. The Reporter deleted the Nairn East allocation in part because of potential flood risk.

Assessment Against Other SEA Issues

With many of the main facilities, including both primary schools and town centre, being centrally located, a key consideration for development proposals in Nairn has been the ability to deliver competitive sustainable transport options. The railway line poses a significant constraint to Nairn South and large parts of the land are prime agricultural land. The land to the west is further detached from the town and a bottle neck at the junction of the A96 and Tradepark Road means active travel upgrades will be difficult to achieve. The developable parts of the land at Granny Barbour Road are distant from the rest of the town and most of its facilities. The Reporter deleted the allocation at Nairn east in part because of this peripherality. Allocated land in the town centre has redevelopment opportunities and offers high levels of sustainability.

Assessment Against Socio-Economic Issues

Nairn is the third largest settlement in Highland and provides a wide range of economic and social functions for the wider Nairnshire county. Long term housebuilding rates have been relatively high and this has helped strengthen the role of Nairn and support an increasing population. However, the supply of new open market housing could dry up when Kingsteps, the last planned development at Lochloy, is completed. Few proposals have come forward for employment related development in Nairn. Land for the expansion of the sawmill at the Nairn South has been confirmed despite outstanding transport and land availability issues. To protect the town centre, speculative retail development near the Sainsbury's supermarket is not supported.

North Kessock

Assessment Against Flooding Issues

The suggested larger Bellfield Farm expansion area has watercourse and waterbody issues and the associated flood risk has been one factor in rejecting that area. Otherwise, flood risk hasn't been a determining factor in site preference selection.

Assessment Against Other SEA Issues

North Kessock is a sustainable location for future growth because it benefits from close proximity to the City of Inverness in terms of relatively easy access to employment. The village also has a sheltered, southerly aspect and room for expansion is available on gently undulating land. More negatively, there is one feasible location for growth, to the west of the village. The Beaully Firth and its associated heritage interests constrain expansion to the south. Land to the west is prime farmland. Infill opportunities are limited by both topography and the need to safeguard valued greenspace. Given the above, we have limited future housing development to a smaller expansion area west of the village plus smaller sites for other uses closer to the centre of the village. The larger suggested expansion area on the west part of Bellfield Farm has been rejected because it is more distant from the village's facilities and a large area of prime farmland would be irreversibly lost.

Assessment Against Socio-Economic Issues

North Kessock is a viable location for future growth because it benefits from close proximity to the City of Inverness in terms of relatively easy access to employment, water, sewerage and other infrastructure provision. Secondary education provision is further afield but both primary and high school capacities are adequate. The village's A9 junction has been upgraded and an improvement to the Kessock Bridge A9/82 junction is programmed to be completed in the next 10 years. More negatively, there is one feasible location for growth, to the west of the village. The A9 and its adjoining high pressure gas pipeline constrain growth to the north. Given the above, we have limited development prospects on land to the west of the village plus sites closer to the centre of the village to better manage travel and visitor impacts via a Park and Ride and a campervan servicing site.

Seaboard Villages

Assessment Against Flooding Issues

The southern end of land at South of Shore Street is adjacent to the coast and is at risk of coastal flooding. Equally a selection of smaller infill sites that were promoted in the Call for Sites along New Street are at risk of flooding. Flood Risk Assessments are required as mitigation with no development on areas shown to be at risk.

Assessment Against Other SEA Issues

The southern end of land at South of Shore Street has not been confirmed due to proximity to the SSSI and the Shandwick Stone Scheduled Monument. There is potential for the setting of the Scheduled Monument to be impacted. It is also classed as prime agricultural land. Similarly a selection of smaller infill sites that were promoted in the Call for Sites along New Street are not positively identified because they could have adverse landscape and visual effects.

Assessment Against Socio-Economic Issues

Within the settlement hierarchy Seaboard Villages is classed as a partially sustainable main settlement which is suitable for a small amount of growth. There is a Primary School with capacity for a modest amount growth and pupils must travel to Tain for secondary education. There has been a decrease in bus services in recent times making many residents more dependent on private cars for accessing services further afield and employment opportunities. Business/light industrial land at Balintore Industrial Estate is confirmed in a bid to retain and attract further local employment opportunities. A district heat network is not considered economically viable due there being no anchor load and the population is too small.

Strathpeffer

Assessment Against Flooding Issues

There is potential for flood risk from the Kinellan Burn for the site at Kinellan North and as such a developer requirement has been included asking for a Flood Risk Assessment and no development within areas shown to be at risk from flooding. However it should be recognised that development has started on Kinellan South. Potential flood risk was one of the factors in Kinellan West not being confirmed.

Assessment Against Other SEA Issues

There is ancient woodland around Strathpeffer and in particular it borders the site at Nutwood. However, mitigation has been included to ensure enough separation distance is left between any development and the trees. Strathpeffer has a Conservation Area around its historic core and within it there are numerous listed buildings. The site at Nutwood abuts the northern boundary. Mitigation has been included to provide a planted buffer between any development and the Conservation Area.

Assessment Against Socio-Economic Issues

Within the settlement hierarchy Strathpeffer is classed as a partially sustainable main settlement which is suitable for a small amount of growth. There is a Primary School with room for modest growth. Pupils must travel to Dingwall for secondary education. Public transport options are limited as are employment opportunities. Most residents are dependent on private cars to access most services. It is unlikely that a district heat network would be viable in the settlement and it is not on the mains gas network. However, it is still a safe and attractive place to live and the development at Kinellan affords the opportunity for a well-planned modest expansion of the settlement. On balance, it is considered that a small amount of growth is the most sustainable option for Strathpeffer.

Tain

Assessment Against Flooding Issues

Coastal flooding is mostly confined to land on the eastern side of the railway line and therefore is not a concern for any of the sites identified. There is some surface water flooding potential particularly around Kirksheaf Road and Tain Royal Academy. Mitigation where necessary for either Flood Risk Assessment or Drainage Impact Assessment is included for sites.

Assessment Against Other SEA Issues

There is a Conservation Area in Tain and there are numerous listed buildings within it. Sites at The Grove and at Kirksheaf Road are in closest proximity but are unlikely to have any impact subject to sensitive siting and design mitigation. Designations at the Cromarty Firth and the Dornoch Firth National Scenic Area are all adjacent to Tain. Mitigation has been added to the confirmed sites to address potential adverse effects on all known heritage features. Most of the land on the opposite side of the A9 and around Knockbreck is classed as prime agricultural land. Subsequently, the Reporter concluded that the potential adverse natural heritage effects of

sites outwith the bypass were sufficient to delete the allocations but that land at Knockbreck be confirmed because of its fewer likely adverse effects.

Assessment Against Socio-Economic Issues

In the settlement hierarchy Tain is classed as a tier 1 settlement and as such is one of the most suitable locations for growth. The delivery of a new 3-18 school campus is a key aspiration for the town. When this aspiration is achieved it will leave a large site around the current Tain Royal Academy available for development. We believe this is the optimum site for future development because it is central, viable and a sustainable redevelopment opportunity which should be pursued for house building in advance of sites on the opposite side of the A9. Land at Knockbreck is proposed to be removed from the Plan because it has not come forward for development. A district heat network could be economically viable in Tain.

Tomatin

Assessment Against Flooding Issues

The River Findhorn flows to the west of the main village and limits further development in that direction. Subsidiaries of the River Findhorn cut through Tomatin but do not pose significant constraints to development options.

Assessment Against Other SEA Issues

Site choices have taken account of the large areas of woodland which exist to the west and north of the village and the issue of active travel connectivity to local facilities.

Assessment Against Socio-Economic Issues

The adopted Plan identified Tomatin for significant growth because of the prospect of the A9 being fully dualled, a plentiful supply of development land and desire to rejuvenate an area with a static and ageing population. However, we no longer wish to encourage car based commuting and nationally set population and household projections are lower than they were 5 years ago. There are also concerns about the economic viability of the larger allocations for example in terms of the cost of public sewerage provision. Instead, smaller sites have been allocated for employment related uses and infill housing which will help to strengthen the local community.

Tore

Assessment Against Flooding Issues

The chosen development sites are not subject to mapped fluvial flood risk but do contain watercourses that are addressed via development setback mitigation.

Assessment Against Other SEA Issues

We rejected the submission for a large new/expanded settlement at Tore because it does not meet our reassessed priority of environmental sustainability. Accordingly, we have only confirmed one small housing site at Woodneuk, which benefits from a planning permission, would infill a cluster of existing development and is close to the primary school. Treed land north of the grain mill has potential to absorb expansion of existing operations including larger scale buildings into the local landscape albeit there will be a need for compensatory planting. Subsequently, the Reporter deleted the allocation at the mill principally because of likely net adverse effects on the tree/woodland resource.

Assessment Against Socio-Economic Issues

Despite its excellent trunk road connectivity a large new/expanded settlement at Tore would not meet our reassessed priority of economic viability (i.e. Tore is not a location where there is spare existing capacity in supporting infrastructure networks and new capacity cannot be added in a cost effective way by the public and private sectors). Tore has few existing, local jobs and the major road corridors inhibit active travel across the settlement in particular to and from the primary school and bus stops. Moreover, major expansion would require similarly significant up front investment in primary school and sewerage facilities. However, Tore is a competitive location for industrial and storage uses and existing enterprises may require to be expanded.

Tornagrain

Assessment Against Flooding Issues

There are no significant fluvial flood risks at Tornagrain. Drainage Impact Assessments will need to be carefully considered as part of each phase of development and surface water drainage will be expected to be dealt with on site through suitable mitigation measures.

Assessment Against Other SEA Issues

From a development point of view, the area benefits from relatively few environmental constraints. It is slightly sloping land, from south to north, with pockets of woodland which will be safeguarded. As the site continues to be built out, ensuring suitable levels of transport infrastructure are delivered will be important, including sustainable travel connections to key employment destinations e.g. Inverness Airport Business Park.

Assessment Against Socio-Economic Issues

Tornagrain new town represents a major part of the long term growth strategy for the area. Since the first residents moved in in 2017, house sales continue to increase in number. Ensuring that infrastructure, particularly primary and secondary education, is delivered and enhanced in line with development is a key mitigation.

8 Assessment of Different Types and Impacts of Environmental Effects

In our policy and development site options assessments we attempted to consider all the different types and degrees of significance of impact on the environment of each option. This section details some examples of that consideration.

Cumulative

- In terms of *secondary or indirect effects* we believe that the Plan's proposed better auditing, protection and where possible enhancement of publicly accessible local green spaces and green networks will have a positive, beneficial, indirect effect on human health because, other things being equal, active travel within those spaces and networks should increase.
- An example of consideration of *synergistic effects* (effects that interact with each other and become greater) would be the interaction of our approaches to encourage more sustainable travel choices and to promote a more sustainable settlement hierarchy. The two approaches overlap and coincide in that if a higher proportion of future development occurs within the settlements with the best sustainable travel options then modal shift should be easier to achieve and the combined positive effects should be greater.
- *Additive effects* (incrementally increasing) have been considered for example in reflecting the negative effects of a settlement hierarchy that would allow a continuation of incremental housing development in the countryside and in the smallest settlements of the Plan area – i.e. in environmentally unsustainable locations.

Impacts

- Our policy and development site options assessments considered the *scale of impacts* (their quantitative and geographic extent) by looking at potential effects at the Plan-wide, settlement-wide and site-specific levels and also by scoring at two different and defined (in Appendix 1 to this Report) levels.
- In terms of *magnitude of impacts* (the scale of impacts relative to the sensitivity or scale of the existing resource) we tailored the site-specific assessment scoring to take account of these factors for example in terms of flood risk, agricultural land quality and school capacity (Appendix 1 to this Report contains further details).
- We believe that the *frequency of the impacts* of a development is directly proportional to its scale, density and occupancy e.g. the number of houses and people in a development will to a large degree determine how often an adjoining environmental resource is affected. Our development site assessments take account of the land use and likely density of development proposed.
- Similarly, we believe that the *probability of an impact* is directly proportional to its scale, density and occupancy and that these matters have been adequately assessed in applying the site assessment matrix detailed in the Appendix to this Report.
- In terms of the *duration of impacts*, our policy and development site assessments differentiate short term construction phase effects from those longer term effects that will persist post completion of a development or until related mitigation measures have been fully implemented.
- Finally, in terms of the *reversibility of impacts*, we believe that most built development has relatively permanent, longer term effects and have scored our policy and development site assessments accordingly. Demolition or change of use of a building can be achieved but is often not viable or practicable. Even these measures couldn't reverse the loss of prime farmland for example.

9 Monitoring

We will monitor significant environmental effects that may be caused by the implementation of the Inner Moray Firth Local Development Plan 2. This will include identifying any unforeseen adverse effects and to take appropriate remedial action in addition to mitigation already specified.

The Highland Council has very limited resources to monitor the effects of all of its activities across a geographic area larger than some nation states and therefore our monitoring is focussed on issues and areas where reliable data is readily available. However, we commit to listen to and work with the general public and other stakeholders to identify and investigate environmental effect issues and to evolve appropriate mitigatory or remedial policies and actions.

Planning decisions and processes are far more transparent now than 10 or more years ago via accessibility to more searchable online information and webcasts of important meetings and decisions. Accordingly, our consideration of environmental data and effect matters is also more transparent.

We are always open to suggestions for the use of better environmental baseline data, any suggestions for a better methodology for its interpretation and practicable ways to improve monitoring. We invited suggestions during consultation on this Report and welcome suggestions at any time via devplans@highland.gov.uk. **Section 4 of this Report and Appendix 1 set out the data and sources we used in the formulation of the Plan and which we will use to monitor its environmental and other effects.** For brevity these are not restated here. Most of these datasets are now available via public, online, GIS (map based) platforms with an annual or more frequent update cycle which means that now we can react faster to any change in the environmental baseline or environmental effects.

The updated and expanded Scottish primary legislation on town and country planning now requires each local planning authority to obtain or collect more data that, in the future, can be used to enhance the monitoring of this Plan and the forthcoming “new-style” Highland Local Development Plan. For example, each future local development plan will have a statutory duty to be underpinned by assessments of health needs, water supply capacity, renewable energy sources, children’s play areas and open space. Further details are available via <https://www.legislation.gov.uk/asp/2019/13/contents/enacted> .

10 Summary of Previous Stages

Scoping

The Highland Council's Scoping Report was submitted to the SEA Gateway in August 2019. A copy can be read via [this page](#). This incorporated consideration of initial discussions with and comments from the Consultation Authorities.

All 3 Consultation Authorities responded and their statements follow.

Historic Environment Scotland

Scope and level of detail

We note that the historic environment has been scoped in to the assessment and we are content to agree with this. On the basis of the information provided, we are content with the approach outlined in the scoping report and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided below. We welcome the ongoing engagement regarding the approach to the assessment of this plan. While the scoping report is concise in nature we are aware of the work being carried out in relation to the assessment of plan, particularly in reference to consideration of the environmental effects associated with potential spatial components coming through the Call for Sites. We note the policy assessment matrix and are content with this but would suggest that the ability for a neutral effect is included. In terms of the site assessment matrix it would have been beneficial to see a draft matrix at this stage but based on the draft matrix we have previously seen in the draft of this scoping report we are generally content. However, we welcome the opportunity to continue to engage with you throughout the assessment process, particularly in relation to the new procedures for consultation authority engagement that are being trialled as part of this process.

Consultation period for the Environmental Report

We note that you intend to consult on the Main Issues Report and its environmental report for a minimum of 8 weeks. We can confirm that we are content with this timescale. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.

Scottish Natural Heritage (SNH now NatureScot)

The report is brief and focussed but it does pick up the key elements to be considered in the assessment process with the exception of the details of the site assessment criteria and matrix which is still in preparation. Thank you for the opportunity to subsequently discuss the site assessment matrix at our meeting on 21 August. We confirm we are content with this process and we have commented on this separately. We welcome your partnership approach to site assessments and forward to working with you to refine these further. We welcome the scoping in of all the SEA topics and it would be useful to consider geodiversity possibly within the soils or landscape topic. In terms of baseline data, we recommend that you include the data and guidance from the Dynamic Coast National Coastal Change Assessment - <http://www.dynamiccoast.com/>. I appreciate that you are familiar with this and we would be happy to help with the interpretation of the data if necessary. We welcome the consideration of green networks in both the biodiversity and material assets topics. We suggest this is extended to include green and blue networks and the interaction of this infrastructure is also relevant to population and human health. In terms of the assessment methodology, we support the simplicity of the scoring system but recommend that there is a neutral or no impact category to avoid having to shoe-horn a neutral impact into a negative or positive category. Identifying mitigation to possible significant adverse effects is arguably the most important outcome of the assessment process. We would hope to see a detailed table illustrating what mitigation is proposed; whether this includes specific measures, such as developer requirements, or signposting further consideration of possible mitigation at a lower tier plan; who will be responsible for carrying out the mitigation and by when. We are happy with the 8 week consultation period.

Scottish Environment Protection Agency

Thank you for your Scoping consultation submitted under the above Act in respect of the Inner Moray Firth Local Development Plan 2. This was received by SEPA via the Scottish Government SEA Gateway on 7 August 2019. We very much welcome the pro-active approach you are taking to including us in the development of the new plan and related SEA work. As required under Section 15(2) of the Act, we have considered the document submitted and can confirm that we are content in respect of the scope and level of detail to be included in the Environmental Report (ER). We are also content with the proposed consultation period. We look forward to discussing and hopefully agreeing the proposed site assessment matrix at our next meeting.

How We Responded to the Consultation Authorities' Submissions

We agreed that the recording of neutral effects for both policy and development site assessments should be included and have done so. In the online site assessments, if neutral pre mitigation effects are predicted then the score boxes are left blank and neutral post mitigation effects are referenced in the Post Mitigation comments box. We also shared a draft of the Report and the development site matrices and completed assessments with the Consultation Authorities prior to the formal publication of the Main Issues Report and the Draft Environmental Report. Our site assessments included consideration of the coastal change data referenced by SNH, and both our policy and site assessments considered the environmental effects, of and on, both blue and green networks. Mitigation suggestions were included in the Draft Environmental Report and the specific, full wording of that mitigation is now added to the Revised Environmental Report and the corresponding developer requirement text of the Proposed Plan. The degree of detail given in mitigation depends upon the degree of certainty about the proposal likely on any given development site. For example, we don't specify the developer and timeframe within which it must complete mitigation unless that is already defined within a recent extant permission and/or legal agreement.

Draft Environmental Report

The Highland Council's draft Environmental Report, which accompanied the publication of the Inner Moray Firth Local Development Plan: Main Issues Report, was submitted to the SEA Gateway in January 2021. A copy can be read via [this page](#). All 3 Consultation Authorities responded and their statements follow.

Historic Environment Scotland

A More Proportionate and Holistic Approach

We welcome the consideration given here to proportionality within the assessment process. It should be noted that the Scottish Government review noted here was undertaken to look into a number of facets of the environmental assessment of development plans. The review report can be found here - www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=2c4ee110-e421-4515-aeac-a808009f9584 It is important that an appropriate balance is found in streamlining the assessment process and retaining the value of the process in understanding the environmental implications of decisions and presenting this information for scrutiny. In terms of the comments on a holistic approach the reference to the sustainability appraisal approach taken by some other countries is noted. However, the preparation of an environmental report should focus on the environmental implications of the proposals and their reasonable alternatives. In light of this we welcome that our previous recommendation of colour coding those elements of assessment related to socio-economic factors has served to offer greater clarity in reporting the environmental performance of the preferred approaches and their alternatives.

The Environmental Baseline and SEA Objectives

As we noted in response to the scoping for this assessment, we are content that an appropriate baseline and SEA objective have been identified for the historic environment. In our comments below relating to the assessment of policy options, we point to how we think the historic environment baseline should be considered at the different scales of assessment (e.g. policy and allocation) and that this baseline should be considered as both assets to be protected and a resource to help deliver wider benefits.

What is the Plan and how does it relate to other Environmental Policies, Plans and Legislation?

We welcome the recognition here of the Historic Environment Policy for Scotland (HEPS). This policy sets out a number of principles for the recognition, care and sustainable management of the historic environment. It promotes a way of understanding the value of the historic environment which is inclusive and recognises different views. It also sets out a framework for managing change in the historic environment, where opportunities for enhancement are identified and mitigation put in place where harm is unavoidable. The preparation of all plans in Scotland should be considered through the policies and principles within HEPS. Of particular relevance to the Inner Moray Firth LDP is Policy HEP3 which states that "Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment."

Assessment of Policy Options

The assessment of policy options offers the opportunity to consider the historic environment holistically through the assessment. As presented, the assessment findings focus on the impacts of the policy on the historic environment and offers mitigation for any identified effects, such as site-specific developer requirements. While this is welcomed, we consider that greater consideration could be given to the interaction of the historic environment with the identified policy options. For example, while the historic environment faces significant challenges from the effects of climate change it also forms part of the response to these pressures. Part of this response is through the maintenance, re-use and adaptation of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent. In light of this we would offer the following comments on the assessment of a number of the identified main issues.

Addressing the Climate and Ecological Emergency

The assessment considers it more likely that there will be adverse effects on urban built heritage and less on rural built heritage as a result of the consolidation of future growth within the largest settlements. While we agree that effects are more likely in the urban environment the nature of these effects are complex. For example, the focus of growth in existing built environments and infrastructure capacity can have positive effects for the historic environment through the maintenance, reuse and adaptation of our existing assets and ensuring the sustainability of our places as a whole. We would also note that we are unclear what the phrase “net betterment” means in the context of the historic environment.

Supporting a strong, diverse and sustainable economy

As the assessment notes, the effects of a more flexible approach to employment land location on the historic environment will be dependent on the characteristics of the identified land. The linkages identified between the historic environment and its relationship with sustainable travel modes is also welcomed. We note that the potential for the tourism and leisure uses of Fort George following the withdrawal of the Ministry of Defence is specifically mentioned within the MIR under this issue. We have offered detailed comments on this issue elsewhere but it is worth reiterating the challenges and opportunities associated with the site from both a climate change and maintenance, adaptation and re-use will be a significant consideration.

Growing the most sustainable places

As with our comments on the assessment of first main issue (Addressing the Climate and Ecological Emergency) we consider that a focus of development within existing settlements can offer positive outcomes for the historic environment as well as the potential for negative through inappropriate and poorly designed development. Such positive outcomes include ensuring sustainable futures for our historic places as well as ensuring that the infrastructure and services that support our historic places (and in many cases form part of our historic environment) are maintained and kept in active use. The commitment to site-specific developer requirements is particularly welcomed as this is a key output of the environmental assessment process, with the mitigation identified through site assessment being carried forward to the plan to ensure delivery.

Creating a more healthy, sustainable transport network

The environmental implications arising from such interventions as an expansion in park and ride sites will be dependent on site specific characteristics so we would expect any such sites identified to be assessed and accompanied by suitable developer requirements where appropriate. We would also note that the consolidation of existing infrastructure assets has the potential for both positive and negative effects on such assets of historic environment interest.

Identifying and safeguarding valued, local green space

Many of our green spaces are related to the historic environment in ways such as providing the setting of historic assets as well as being historic assets in themselves such as gardens and designed landscapes and village greens. We therefore agree that the improved protection of such sites has the potential for positive effects on the historic environment.

Placemaking

The historic environment is at the heart of successful placemaking. This can involve the incorporation of existing historic assets into new developments as well as the cultural context of places informing a sense of place. We welcome the inclusion of the consideration of the role and contribution of the historic environment within the provided placemaking audit. This suggests that the preferred approach has the potential for positive effects in this area. Furthermore, the aspiration for the creation of the conservation areas of the future is welcomed.

Assessment of Development Site Options

Settlement Summaries

We welcome the presentation of these settlement summaries and, while brief in nature, they give an overview of the key environmental pressures and opportunities. Given the general approach taken throughout the assessment we welcome that the environmental implications for these settlements have been separated from socio-economic issues, giving clarity to the reporting.

Mapped SEA Site Assessments

The innovative presentation of the site assessments on a digital mapping platform is excellent and we found this to be a particularly accessible and helpful method of illustrating the individual findings of the assessment. We would note that the list of assessment findings under cultural heritage does not include the presentation of findings relating to historic gardens and designed landscapes. As we have been seen the underlying data informing the assessment we are aware that an assessment of these sites has been undertaken and indeed some of the findings have been mentioned in the assessment under landscape. We therefore point to this omission in order for you to update the tool.

In terms of the specific findings of the assessment we would offer the following comments.

Auldearn AU05

We agree with the finding of a potentially adverse effect on the scheduled monument as a result of this non-preferred option. The mitigation put forward by the assessment suggests that development should be setback from the monument in order to avoid direct impact on the site and retain an appropriate setting for the site. We are content to agree with this mitigation and should the site be brought forward we would

expect the allocation boundary to be redrawn to exclude the scheduled area and retain an appropriate setting or that developer requirements are attached to the allocation to ensure the protection of the site and its setting.

Auldearn AU06

The environmental assessment findings suggest a significant adverse effect on the Inventory Battlefield of Auldearn, citing its location within the Inventory boundary. Furthermore, no mitigation is considered deliverable that would lessen this effect as a result of it lying wholly within the battlefield. Given the location of the site and its potential effect on the appreciation and understanding of the battlefield in terms of troop movement and retreat as well as the potential impact on battlefield archaeology we agree with the assessment findings.

Inverness IN09

We agree that there is the potential for significant effects on the setting of heritage assets in the vicinity of the proposal. The proposed mitigation of the assessment and safeguarding of the surrounding sites is welcomed and we would expect this mitigation to be referenced in the developer requirements for the allocation.

Inverness IN59

We are content to agree with the assessment findings in relation to the scheduled monument Bogbain Wood, hut circle and field system 400m SSW of Bogbain Farm (SM4698) and recommend that, should this alternative site be brought forward, developer requirements reflecting the assessment are included as part of the allocation.

Inverness IN102

The assessment identifies a number of heritage assets in the vicinity of the proposal. These include the Inventory Battlefield of Culloden, the Culloden Muir conservation area and the Culloden House Garden and Designed Landscape. We agree with the assessment provided and recommend that the mitigation is carried through to the developer requirements for the site.

Inverness IN109

We note that this site is not preferred for inclusion on the Local Development Plan. The assessment notes the potential for adverse effects on the historic environment assets in the vicinity, including the Inventory Battlefield of Culloden and the Culloden Muir conservation area. We are content to agree with the assessment provided here.

Inverness IN110

The assessment findings here in relation to the Inventory Battlefield of Culloden are noted. We consider that development here has the potential for a significant adverse effect on the battlefield and have offered more detailed comment on this in response to the Main Issues Report. Subsequently we consider that mitigation would be unlikely to lessen the significance of the impact on the battlefield.

Maryburgh MB05

The assessment considers that this site would have an adverse effect on the Brahan Inventory Garden and Designed Landscape. The mitigation put forward to address this adverse effect notes states that development of the designation should be avoided. We are content to agree with both the assessment findings and the proposed mitigation. Should the site be retained in the local development plan we would recommend that this mitigation is written into developer requirements to ensure delivery.

Maryburgh MB06

We note that the assessment of this site considers that the proposal would have a significant adverse effect on the Brahan Inventory Garden and Designed Landscape. While we are content to agree with this assessment we do not consider that the proposed mitigation would lessen the adverse effect on the historic environment asset. We therefore welcome that it is not a preferred site for allocation in the plan.

Muir of Ord MU05

We welcome that the assessment recognises the potential for a significant adverse effect on the scheduled monument Windhill, standing stone N of (SM3128). In terms of mitigation the assessment considers that the in situ preservation of the scheduled monument would serve to mitigate the predicted effect to a neutral level. We do not agree that this would lessen the level of effect to neutral and consider that the mitigation should explicitly call for the retention of the scheduled monument within an appropriate setting. We would expect a developer requirement associated with the allocation to reflect this.

Monitoring

The recognition of the requirement to monitor the significant environmental effects of the plan is welcomed. The requirement relates only to the significant effects so we would recommend that the focus is on these when considering any monitoring framework. In many cases an identified significant effect within the assessment is predicted to be lessened by mitigation which will inform developer requirements. It is therefore the successful application of these developer requirements that should be monitored.

NatureScot

Annex

NatureScot welcomes the more proportionate and holistic approach taken by The Highland Council in preparing the Draft Inner Moray Firth Local Development Plan 2 Draft Environmental Report. For example, we welcome the more targeted and simpler approach to collecting, analysing and presentation of data, plus, the inclusion of socio-economic factors along with environmental factors, but with the main focus still on the environment given the aim of the Strategic Environmental Assessment process. However, we advise there are significant omissions in reporting on the assessment findings for elements of the MIR, such as the Economic Development Areas, Growing Settlements and in some cases reporting on potential significant negative effects from some of the development site options. We are happy with the approach taken when assessing the allocations and settlements and have found the interactive site assessment maps a very useful tool. Subject to the comments below, we are largely happy with the assessment findings in the development Site Options and have made representations in respect of these settlements in the MIR consultation response. We have also welcomed the opportunity to provide comments on many of the draft assessments prior to the MIR consultation phase which has helped to inform the Mapped SEA Site Assessments tool. With the exception of the reporting omissions, this is a very succinct, and easy to follow assessment of the potential environmental effects as a result of the proposed

Inner Moray Firth Local Development Plan 2, and therefore, a user friendly Draft Environmental Report. While the focussed approach is welcomed, it is important that the full effects are summarised in the settlement statements so that decisions are taken in light of the documented environmental and potentially negative effects. At this draft stage, we have not included the sections within the draft Environmental Report where we have no comment to make.

Summary of Previous Stages - Scoping

We note the response to our advice at the scoping stage which states that our advice has been taken into account during the site and policy options assessment process. While this is mostly reflected within the draft ER and the individual sites, we do note, however, that there are many areas where green and blue networks have not been considered, but could be considered. We have provided feedback in this context for individual sites as part of the pre-Main Issues Report stage and examples for the assessment of policy options are provided further in this response. We would also like to point out that the symbol for a neutral score is missing from the Appendix: Site Assessment Questions, Interpretation and Scoring, and needs to be added.

Assessment of Policy Options

MAIN ISSUE 1 - Address the Climate and Ecological Emergency

There are opportunities to include in Our Preferred Approach, green and blue networks along with green and blue (water) spaces to assist in maximising the climate change offsetting potential. We recommend that the detail for the preferred approach makes reference to biodiversity loss alongside climate change. A number of the SEA topics (i.e. Biodiversity, Flora and Fauna; Population and Human Health; Soil; Water; Air Climatic Factors and Landscape) should also consider including green and blue networks along with how these can bring about positive effects. As well as protecting existing green spaces, the focus should also be on identifying opportunities to enhance and create new green and blue spaces as well as green and blue networks plus identifying how they can play a part in mitigation for the preferred approach.

MAIN ISSUE 2 - Supporting a strong, diverse and sustainable economy (post pandemic Economic Recovery)

In terms of Our Preferred Approach, and as one of the main themes for your MIR, we recommend referring to and considering a green recovery plan as part of this approach. A green recovery plan can help to provide green jobs, and nature-based solutions can provide a healthy and attractive environment to live and work in. These should be considered in terms of positive likely effects and mitigation for the preferred approach for SEA topics Biodiversity, Flora and Fauna; Population and Human Health; and Climatic Factors.

MAIN ISSUE 3 - Grow the most sustainable places

Within Our Preferred Approach it is unclear how future housing and commercial growth would be directed to a more environmentally sustainable and economically viable location. We therefore suggest that reference to taking a place-based approach is included within the preferred approach section to help explain this. For the Biodiversity, Flora and Fauna SEA topic, we suggest reference to the use of the settlement hierarchy and a plan led approach to help understand how this topic has been assessed. Reference to how this approach intends to avoid important natural heritage features and open space should also be included in the assessment of likely effects of the preferred approach. In terms of mitigation for the preferred approach, as well as avoiding the development of useable green space, there are opportunities for the placemaking policy to include measures to enhance green spaces as well green networks which can be positive for Population and Human Health. With reference to growing the most sustainable places, all watercourses should be considered and assessed within the Water SEA topic. For example, the preferred approach and/or mitigation can also include measures to incorporate waterbodies within placemaking designs through creating or enhancing green and blue networks which can help to protect the water environment.

MAIN ISSUE 5 - Match development with infrastructure capacity

We note that natural infrastructures have not been considered within this Main Issue. Please refer to the following report which includes natural infrastructure as part of Scotland's infrastructure – https://infrastructurecommission.scot/storage/245/FullReport_200120.pdf. This approach would enable natural infrastructures as well as other infrastructures to be assessed together against each of the SEA topics within this Main Issue.

MAIN ISSUE 6 - Create a more healthy, sustainable transport network

As referred to in our response to MAIN ISSUE 2, there are opportunities for a green recovery in response to the Covid-19 pandemic and could also be part of Our Preferred Approach to creating a healthier and sustainable transport network. Given the inclusion of natural infrastructures as part of the definition of Scotland's infrastructure, the use of watercourses as green and blue transport networks can be considered and assessed within the Water SEA topic.

MAIN ISSUE 7 – Identify and safeguard valued, local green space

We would recommend refining the detail within Our Preferred Approach to state that where green spaces and green networks cannot be protected, developer contributions will then be sought to enhance and create quality green spaces and green networks for the provision of many benefits including improved habitats. This will ensure that the main aim of this policy is to protect green spaces, as opposed to relying on developer contributions to allow development to occur. We note some or no assessment against the Biodiversity, Flora and Fauna; Population and Human Health; Soil; Water; Climatic Factors; and Landscape SEA topics, and we, therefore, recommend that the protection, enhancement and creation of green spaces and green networks should be assessed against these SEA topics both in terms of the likely effects (both negative and positive) and mitigation for the preferred approach.

Assessment of Development Site Options

We are largely happy with the narrative provided for the assessment of site options but the focus is largely on flooding issues with little comment given to the other SEA issues. While we welcome the brevity, we would also offer the following comments: -

Alness – it is important that the loss of native woodland at Darroch Brae East and West is recorded as significant and negative. Compensatory planting will not substitute for the loss of ancient and semi-natural woodland which should be considered as an irreplaceable habitat.

Inverness City – the narrative is extremely brief and it would benefit from recognising the potential significant adverse effects from possible allocations around the mouth of the River Ness and Moray Firth as well as allocations located within, including or adjacent to protected areas.

Tain – for many of the proposed sites, the connectivity to the Morangie Forest Special Protection Area (SPA) and the potential significant adverse effects on the qualifying interest should be documented in the assessment report. We note that the assessments of the Economic Development Areas and Growing Settlements have not been included in the draft Environmental Report, and we recommend that these assessments should be included as part of the updated Environmental Report which accompanies the proposed Inner Moray Firth Local Development Plan 2.

Mitigation

It would be helpful if there were generic mitigation measures proposed, for example mitigation measures proposed within developer requirements could be pulled out into one specific section within the report.

Assessment of Different Types and Impacts of Environmental Effects

In terms of cumulative effects, we recommend that you also consider the combined effects of plans. For example, we would like to see the potential combined effects from the individual proposed sites at the Seaboard Villages settlement when considered cumulatively.

Monitoring

We acknowledge the difficulty of monitoring, but suggest that monitoring should relate to those areas where there are proposals likely to result in significant environmental effects, rather than where reliable data is readily available.

Appendix: Site Assessment Questions, Interpretation and Scoring

The following advice refers to the tables within this Appendix: -

1 Water Environment: For questions 1 and 2 within this table, we suggest the inclusion of natural solutions as protection measures such as buffer strips and de-culverting as examples of small and large scale physical improvements, and which could give a single or double positive score.

2 Climate Change: For question 6 within this table, we would welcome some examples of mitigation measures for addressing coastal erosion which could provide a single or double negative score.

3 Biodiversity: For question 9 within this table, another European site to include is Ramsar sites.

For question 10, within this table, along with considering Ancient Woodland and Geological Conservation Review (GCR) sites, there are also Scottish Semi-Natural Woodland Inventory and Red Squirrel Priority Woodlands which should also be included as part of the assessment process.

4 Waste and Natural Resources: For question 14 within this table, it is unclear how effects on the wider green network will be assessed without a mapped green network, and we would welcome further information on this assessment.

5 Landscape: For questions 20 and 22 within this table, along with minor and significant enhancement measures, minor and significant positives could include proposals to protect part (minor) or all (significant) of a site designated for landscape, and we would like to see this considered for inclusion as part of the assessment process.

Scottish Natural Heritage (SNH) changed its brand name to NatureScot on the 24th of August 2020. We note areas where NatureScot is referred to, and there are few places (excluding web links) where SNH is still included. It may be useful to update the brand name for your final version of your Environmental Report which will support your proposed Inner Moray Firth Local Development Plan 2.

Scottish Environment Protection Agency

We welcome the collaborative approach you have taken with SEPA and other key agencies in the preparation of the Inner Moray Firth Local Development Plan. We previously provided you with detailed site specific advice on all the potential allocations, with the exception of those in Inverness which were not available at that time. We would welcome the opportunity to meet with you and discuss further how this has been taken into consideration in the site proposals outlined in the Main Issues Report (MIR). We are especially keen to ensure that any new allocations avoid flood risk, as avoidance is the keystone to sustainable flood risk management, as outlined in Scottish Planning Policy and supported by your own policies in the Highland Wide Local Development Plan. We would also welcome the opportunity to work with you in preparing developer requirements as we see these as a good way of clearly identifying constraints and opportunities in a way that is transparent to the community and developers. Insofar as they relate to our interests, we are supportive of your proposed preferred approaches. We especially welcome the clear identification of the measures you wish to try and take to address the climate and ecological emergency and the emphasis that is put on that within the document. For example we support the proposed approach of identifying and safeguarding local green spaces and networks. Unfortunately we have not had the opportunity to examine the finalised draft Environmental Report before today's deadline. However we have worked closely with you on its preparation and therefore we are confident that our discussions and advice will be evident in the final submission. I apologise that we have not been able to provide a more detailed response on this occasion however we are committed to continuing to work with you as the plan develops.

How We Responded to the Consultation Authorities' Submissions

Each substantive request for change is set out below together with a summary of how we responded.

Agency	Summary of Comment & Change Sought	Summary of Council Response
Historic Environment Scotland	Believes the historic environment baseline should be considered at the different scales of assessment (e.g. policy and allocation) and that this baseline should be considered as both assets to be protected and a resource to help deliver wider benefits.	This Report and the related Plan do consider built and cultural heritage effects at policy and allocation levels. This heritage is more often a constraint to development than an asset to be exploited. However, with good placemaking the Plan may help create the conservation areas of the future and the Plan allocates several sites to promote the beneficial re-use of heritage buildings to ensure they have a future and can attract investment to protect and enhance their integrity – e.g. Fort George.
	Seeks better recognition that climate change resilience can be addressed through the maintenance, re-use and adaptation of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent.	We have added reference in the Plan (in the Environment Outcome introductory section) to better emphasise the existing asset and resilience roles that built heritage plays in relation to climate change.
	Queries what the phrase “net betterment” means in the context of the historic environment.	Net betterment means net positive effects from a proposal. Examples of positive effects are listed in the two most right hand columns of rows 25-32 of Appendix 1 to this Report – e.g. reuse, regeneration, refurbishment, better public recording/access of built heritage.
	Seeks recognition that a focus of development within existing settlements can offer positive outcomes for the historic environment as well as the potential for negative through inappropriate and poorly designed development. Such positive outcomes include ensuring sustainable futures for our historic places.	We have also added reference in the Plan (in the Environment Outcome introductory section) to emphasise that local built and cultural assets are resources that are critical to a community's identity, distinctiveness and sense of place.
	Queries omission of effects on historic gardens and designed landscapes from map based site assessments.	We apologise for this technical error which has now been corrected. This factor will be added to the map based assessment that accompanies the publication of this revised Report.
	Seeks various site-specific mitigation – e.g. Muir of Ord MO05.	We have added site-specific developer requirement mitigation for all confirmed sites where it has been requested by a Consultation Authority.
	Expresses serious concern about the adequacy of any mitigation for certain sites – e.g. IN110.	This site has not been confirmed within the Proposed Plan.
NatureScot	Expresses concern at significant omissions in reporting on the assessment findings for elements of the MIR, such as the Economic Development Areas, Growing Settlements and in some cases reporting on potential significant negative effects from some of the development site options.	Each of the Economic Development Areas has been assessed in the same way as each main settlement allocation – i.e. through the site assessment matrix. Growing Settlements have not been assessed because they are effectively criteria based policies for an area without a geographic boundary – i.e. they lack specificity to any proposal or site. Trying to predict the environmental effects of the Placemaking Priorities would therefore be no more than guesswork which we believe would be unproductive. We have assessed the Plan's general Growing Settlements Policy. The scale

		of development envisaged within these settlements is small and therefore, other things being equal, its effects should be similarly small. The scoring of individual sites can vary according to each person's professional judgment and knowledge but the matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and therefore there shouldn't be extreme variations in the post mitigation scoring.
	Considers there are many policy areas where green and blue networks have not been considered but should be - e.g. green and blue networks along with green and blue (water) spaces assist in maximising climate change offsetting potential. Policy should reference enhancement and creation of new green and blue spaces as well as green and blue networks.	We have added better references to these spaces and networks within the Plan and this Report. However, we haven't referenced "blue" where this is implicit and therefore adding it would just lengthen the Plan without benefit – e.g. a developer requirement to add riparian woodland doesn't require reference to a blue network.
	Comments that the symbol for a neutral score is missing from the Appendix.	We have previously accepted this error in the site assessment database design. Its remedy is a major and time consuming technical process and therefore we have adopted a workaround solution of noting neutral post mitigation effects in the comments box. Appendix 1 to this Report clarifies states that: "If neutral pre mitigation effects are predicted then the score boxes are left blank and neutral post mitigation effects are referenced in the Post Mitigation comments box." This statement negates the need for Appendix 1 tables to have a neutral effects column.
	Seeks policy reference that biodiversity loss will affect climate change.	The matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and it is impracticable to change them mid Plan and mid SEA process. We agree that perhaps for the next development plan that a separate site assessment question on carbon emissions should be added. The Proposed Plan now includes a policy specifically aimed at biodiversity protection and enhancement.
	Employment policy should reference and consider a green recovery plan. A green recovery plan can help to provide green jobs, and nature-based solutions can provide a healthy and attractive environment to live and work in.	The Plan's Employment section references the green circular economy and creating "green" jobs in terms of promoting sustainable tourism and renewable energy.
	Settlement hierarchy should refer to a place-based approach and the need to avoid important natural heritage features and open space	The Plan's settlement hierarchy is structured according to environmental sustainability and economic viability the former of which includes the "environmental capacity" of settlements to support further growth. Other Plan policies are specific about avoidance, protection and enhancement of environmental resources. The hierarchy is a list of places so it is implicit that it is place-based.

	<p>Policies should enhance green spaces as well green networks both of which can be positive for Population and Human Health.</p> <p>All watercourses should be considered and assessed within the Water SEA topic – e.g. mitigation should incorporate waterbodies within placemaking designs through creating or enhancing green and blue networks which can help to protect the water environment.</p> <p>Seeks reference to natural infrastructure under infrastructure policy</p> <p>Requests reference to use of watercourses as green and blue transport networks</p> <p>Seeks that where green spaces and green networks cannot be protected, developer contributions should then be sought to enhance and create quality green spaces and green networks for the provision of many benefits including improved habitats. Seeks protection, enhancement and creation of green spaces and green networks.</p> <p>Comments that the loss of native woodland at Darroch Brae East and West is recorded as significant and negative but compensatory planting will not substitute for the loss of ancient and semi-natural woodland which should be considered as an irreplaceable habitat.</p> <p>Concerns over the potential significant adverse effects from possible allocations around the mouth of the River Ness and Moray Firth as well as allocations located within, including or adjacent to protected areas.</p> <p>Reports that for Tain that for many of the proposed sites there is a connectivity to the Morangie Forest Special Protection Area (SPA) and the potential significant adverse effects on the qualifying interest should be documented in the assessment report.</p> <p>Notes that the assessments of the Economic Development Areas and Growing Settlements have not been included in the draft Environmental Report, and recommends that these assessments should be included as part of the updated Environmental Report which accompanies the proposed Inner Moray Firth Local Development Plan 2.</p>	<p>We agree. The policy scoring reflects a likely positive outcome.</p> <p>All watercourses are considered under this topic. However, it is often sensible to exclude watercourses and waterbodies from an allocation or settlement boundary because of the flood risk associated with these features even if enclosing it within a development area may add to placemaking and other desirable outcomes.</p> <p>Green networks and green spaces are included under the new Proposed Plan infrastructure general policy.</p> <p>The Plan’s green (including blue) networks are clearly defined as movement corridors for people and wildlife. Our transport policy is about human movement.</p> <p>We have added a new Nature Protection, Preservation and Enhancement general policy which aims to address these matters.</p> <p>These sites have not been confirmed within the Proposed Plan.</p> <p>The Habitats Regulations Appraisal which will accompany the Plan and this Report assesses and defines mitigation for potential adverse effects on European Sites.</p> <p>The Habitats Regulations Appraisal which will accompany the Plan and this Report assesses and defines mitigation for potential adverse effects on European Sites including this one.</p> <p>Each of the Economic Development Areas has been assessed in the same way as each main settlement allocation – i.e. through the site assessment matrix. Growing Settlements have not been assessed because they are effectively criteria based policies for an area without a geographic boundary – i.e. they lack specificity to any proposal or site. Trying to predict the environmental effects of the Placemaking Priorities would therefore be no more than guesswork which we believe would be unproductive. We have assessed the Plan’s</p>
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		general Growing Settlements Policy. The scale of development envisaged within these settlements is small and therefore, other things being equal, its effects should be similarly small.
	Suggests that generic mitigation measures within developer requirements could be pulled out into one specific section within the Report.	We agree and have added standard, allocation developer requirements as Appendix 2 to this Report.
	Recommends that the potential combined effects from the individual proposed sites at Seaboard Villages are considered cumulatively.	Two of the three relevant allocations have not been confirmed within the Proposed Plan. Suitable developer requirements have been added to the relevant, retained site – i.e. a public sewer connection and suitable treatment.
	Monitoring should relate to those areas where there are proposals likely to result in significant environmental effects rather than where reliable data is readily available.	We agree with the logic of this argument. However, some reliable data is required to know where a significant environmental effect relative to baseline conditions has occurred to then assess whether the Plan's policies and their application has caused the effect or contributed to it. We would welcome access to any data NatureScot can share on this topic.
	Appendix - Water Environment: For questions 1 and 2 within this table, suggests the inclusion of natural solutions as protection measures such as buffer strips and de-culverting as examples of small and large scale physical improvements, and which could give a single or double positive score.	The matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and it is impracticable to change them mid Plan and mid SEA process. However, we agree that this can be considered for the next development plan to pass through its SEA process.
	Climate Change: For question 6 within this table, seeks examples of mitigation measures for addressing coastal erosion which could provide a single or double negative score.	The matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and it is impracticable to change them mid Plan and mid SEA process. However, we agree that this can be considered for the next development plan to pass through its SEA process.
	Biodiversity: For question 9 within this table, another European site to include is Ramsar sites. For question 10, add Scottish Semi-Natural Woodland Inventory and Red Squirrel Priority Woodlands	The matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and it is impracticable to change them mid Plan and mid SEA process. However, we agree that this can be considered for the next development plan to pass through its SEA process.
	Waste and Natural Resources: For question 14 within this table, seeks clarification how effects on the wider green network will be assessed without a mapped green network.	The Proposed Plan now includes mapped green networks for main settlements.
	Landscape: For questions 20 and 22 within this table, suggests minor and significant positives could include proposals to protect part (minor) or all (significant) of a site designated for landscape.	The matrix questions and their interpretation were prepared in consultation and agreement with the Consultation Authorities and it is impracticable to change them mid Plan and mid SEA process. However, we agree that this can be considered for the next development plan to pass through its SEA process.

	Scottish Natural Heritage (SNH) has changed its brand name to NatureScot and the Report should be updated to reflect this.	Updates have been made except where reference to the organisation pre-dates its rebranding.
Scottish Environment Protection Agency (SEPA)	Reports that it has offered previous detailed site specific advice on all the potential allocations.	These previous comments were noted.
	States priority is to ensure that any new allocations avoid flood risk.	The Proposed Plan's confirmed allocations avoid vulnerable use development on greenfield land subject to flood risk unless appropriate mitigation can be stated and secured.
	Explains happy to work with Council in preparing allocation developer requirements.	We have worked with all the Consultation Authorities in formulating standard developer requirements (detailed in Appendix 2 to this Report).
	Supports the Council's proposed approach of identifying and safeguarding local green spaces and networks.	Support noted and welcomed.

Revised Environmental Report

The Highland Council's Revised Environmental Report, which accompanied the publication of the Inner Moray Firth Proposed Local Development Plan, was submitted to the SEA Gateway in March 2022. A copy can be read via [this page](#). All 3 Consultation Authorities responded and their statements follow.

Historic Environment Scotland

EDA: Fort George

Support: As you will be aware, in response to the Main Issues Report on the allocation of Fort George as an Economic Development Area we were of the view that, while the mixed uses of community, business, tourism and retail will be of significant importance to for the site going forward, residential options should not be ruled out at this stage. We therefore welcome that a residential component has been added to the mix of uses proposed for the site as many of the buildings have been used for residential accommodation over a long period of time and adaptive re-use and retrofit could play an important part of a balanced mixed use. In terms of the developer requirements that have been put forward we welcome the recognition of the need to respect the historical integrity of Fort George. As a point of detail the statement "safeguard the fabric, historic character and/or curtilage setting of the Listed Buildings" should read "safeguard the fabric, historic character, curtilage and setting of the Listed Buildings". Given the significant historic importance of the site it would also be of benefit for a Conservation Plan to be required in order to ensure that the significance of the asset is understood and to set out how this significance will be retained in the future use and development of the site. We look forward to continued dialogue with all stakeholders regarding the future use of the site in order to ensure its long term sustainability.

NG01 – Nigg Yard

Following consultation on the Main Issues Report we note that this industrial allocation has been expanded to the east. The corresponding environmental assessment has been updated following the proposed expansion of the allocation and we note the prediction of a significant adverse on the setting of the scheduled monuments Dunskeath Castle (SM 3319) and North Sutor Battery, batteries and camps (SM 13750). We agree with this finding. Dunskeath Castle comprises of the remains of a defensive medieval ringwork believed to have been constructed by King William the Lion in 1179. Two concentric semi-circular ditches defend the landward side, with the area enclosed by these situated on a natural spur. The castle subsequently had a Second World War observation post erected in its interior. This has since been demolished and is visible as large fragments of brick and concrete. In terms of the setting of Dunskeath Castle it has clearly been constructed to exert strategic control over the mouth of the Cromarty Firth. From this prominence, occupants of the castle would hold commanding views over the firth. The less precipitous nature of the coastline in this area may also have allowed a safe harbourage below the castle. The large ditches on the castle's landward side suggest its occupants were concerned about potential threats from this direction and defended it accordingly. Views to the north and west of the castle are therefore important to understanding its setting, as well as those to the south. The proposed mitigation for the predicted effect considers that the safeguarding of the fabric, historic character and setting of the scheduled monuments would lead to a neutral effect following the successful delivery of this mitigation. Given the expansion of the allocation towards Dunskeath Castle it is likely that, in order to deliver a neutral effect on the setting of this site, the eastern area of the allocation in particular will need to take the setting of the castle into account and be planned accordingly. This would involve keeping development as far back as possible from Dunskeath Castle. We would therefore expect any masterplan to take this into account.

1 - A More Proportionate and Holistic Approach

Support - We support the more proportionate and holistic approach taken for the Strategic Environmental Assessment and for the Environmental Report and have found the SEA Site Assessments Online Maps a very useful tool.

2 - An Easy Read Summary

Support - This is a very succinct and easy to follow assessment of the potential environmental effects as a result of the proposed Inner Moray Firth Local Development Plan 2, and a very user-friendly Environmental Report.

4 - The Environmental Baseline and SEA Objectives

Support - We support the more streamlined approach to presenting the baseline information. We also agree with the SEA Objectives noted within the Environmental Report.

5 - What is the Plan and how does it relate to other Environmental Policies, Plans and Legislation?

Support - We agree with the approach taken in terms of how it relates to other environmental policies, plans and legislation, and that the proposed Plan has been subject to a Habitats Regulations Appraisal.

6 - Assessment of Policy Options

Do not support - We welcome the assessment of policy options and note that the Vision and Outcomes have already been subject to the SEA process. We also note that that mitigation for many of the policies SEA topics states 'successful implementation of the policy will depend upon its consistent application and enforcement'. However, we are unsure of what it actually means as mitigation, and would welcome clarification of this. For example, Policy 1: Low Carbon Development and the SEA topic for Cultural Heritage includes the following mitigation - 'Undergrounding of heat networks, wall mounted air source heat pumps and heat efficient window designs may compromise adjoining built heritage interests but these can be addressed through detailed design specifications and guidance.' It is possible that inappropriate locations of the undergrounding of heat networks could also result in likely significant effects on important natural heritage features such as protected areas, and therefore, relevant mitigation such as this example could be included for Biodiversity, Flora and Fauna for this policy. We would, therefore, advise that more meaningful mitigation is included where relevant for all of the assessed policies and SEA topics. It would also be reasonable to expect positive effects on Biodiversity, Flora and Fauna with, for example, policies 4: Greenspace; 5: Green Networks; and 8: placemaking. For example, there are opportunities for restoration and enhancement of green networks through Policy 5, and we advise that this should be considered within the assessment, particularly for SEA topics Biodiversity, Flora and Fauna; Population and Human Health; Soil; Water; Air; Climatic Factors; and Landscape.

7 - Assessment of Development Site Options

Do not support - We still feel that the full effects are not completely summarised for all of the site allocations within Section 7, Assessment of Development Options within the Environmental Report (ER). We advise that each summary should include any likely significant effects on protected sites including European sites. While European sites are subject to Habitats Regulations Appraisals, they must still be assessed as part of a Strategic Environmental Assessment. We would, therefore, advise that recognition of the significant adverse effects to biodiversity, along with protected sites including European sites are noted within the ER. Where we believe this to be the case, we have provided further detail within this Annex 1 below. We have also provided specific comments where we believe there are omissions from individual sites assessments.

7 - Assessment of Development Options -AL11: Alness Point

The full potential impacts from coastal erosion have not been considered within the SEA in terms of the impacts from flooding and the potential need for engineered defences, and the effects from this on the Cromarty Firth SSSI and the Cromarty Firth SPA. We do note within the SEA online mapping tool that the mitigation to address flooding in general, is for coastal protection works. We, therefore, do not agree with the mitigation due to the potential for adverse impacts on the SSSI and SPA, and we advise that all potential effects should be included in the assessment along with suitable mitigation, and then included in the Developer Requirements for this site. We advise that mitigation should include ensuring that built development is avoided near the coastal edge, and/or is only permitted if there are clear provisions for re-location or demounting if required by coastal change risk. We also note that, while the Cromarty Firth SSSI has been acknowledged within the SEA for Biodiversity, there are no mitigation measures included. We would advise, therefore, that mitigation measures are included within the SEA to protect the interest of the SSSI, and that these are reflected in the Developer Requirements for the site.

7 - Assessment of Development Options - Avoch

The Likely significant effects (LSEs) on protected areas have not been recognised within the Environmental Report (ER) for Avoch. For example, there are LSEs from allocation AV03: Harbour on the Moray Firth SPA and Moray Firth SAC. We would, therefore, advise that the environmental effects from this site are included with the ER for Avoch.

7 - Assessment of Development Options - DO01: Land South of Dores Hall

There will be a significant loss of Ancient Woodland Inventory from site DO01: Land South of Dores Hall which has not been recognised within the SEA and Environmental Report (ER). There will be likely significant effects in terms of biodiversity and landscape. We would advise that the loss of Ancient Woodland Inventory is acknowledged within the SEA and within the ER for Dores in terms of its impact on biodiversity and landscape interests.

7 - Assessment of Development Options -Muir of Ord

The likely significant effects (LSEs) on protected areas and wooded features have not been recognised within the Environmental Report (ER) for Muir of Ord. For example, there are LSEs on areas of Scottish Semi-Natural Woodland Inventory from allocations MO03: Recreation and Leisure Ares and MO05: Land East of Industrial Estate, along with potential LSEs from allocation MO03 on the Moray Firth SAC, Moray Firth SPA, Inner Moray Firth SPA and Beaully Firth SSSI. We also note that the Inner Moray Firth SPA and Moray Firth SAC have not been assessed within the SEA, and that there are no mitigation measures considered for the Beaully Firth SSSI. We recommend that these protected sites are fully assessed within the SEA and include mitigation, plus, that the environmental effects from MO03 and MO05 are acknowledged within the ER for Muir of Ord.

7 - Assessment of Development Options - North Kessock

The likely significant effects (LSEs) on protected areas and wooded features have not been recognised within the Environmental Report (ER) for North Kessock. For example, there are LSEs on areas of Ancient Woodland and Scottish Semi-Natural Woodland Inventory from allocations NK02: Land Adjoining A9 Junction and NK03: Northbound Car Park, and we advise that these environmental effects are included within the ER.

7 - Assessment of Development Options - Seaboard Villages

We note within the Environmental Report (ER) the removal of allocation 'Land South of Shore Street – Southern Half' due to the proximity to the Rosemarkie and Shandwick Coast SSSI. However, there are still likely significant effects (LSEs) on the SSSI from allocation SB02: Land South

of Shore Street (which now also includes the north part of the removed allocation 'Land South of Shore Street – Southern Half'), including the potential for LSEs as a result of dune erosion and the need for engineered defences to protect such development. There are also LSEs from this allocation on the Moray Firth SPA and Moray Firth SAC. We recommend you include the potential environmental effects from coastal erosion, flooding and the potential need for hard engineered defences, and the effects on the Rosemarkie and Shandwick Coast SSSI in the assessment along with suitable mitigation. We advise that mitigation should include ensuring built development is avoided near the coastal edge, and/or is only permitted if there are clear provisions for re-location or demounting if required by coastal change risk, and to be included in the Developer Requirements for this site. We also advise that the environmental effects on the Rosemarkie and Shandwick Coast SSSI, plus, the Moray Firth SPA and Moray Firth SAC are included within the ER for Seaboard Villages.

7 - Assessment of Development Options - Tain

The likely significant effects (LSEs) on protected areas have not been recognised within the Environmental Report (ER) for Tain. For example, there are LSEs from allocations TN03: Ardlarach Farm, TN04: Croft Arthur, TN05: West of Viewfield Road and TN06: Viewfield on the Morangie Forest SPA along with further LSEs on the Dornoch Firth and Morrich More SAC, and the Dornoch Firth and Loch Fleet SPA from these and other allocations for Tain. There are also LSEs on the Dornoch Firth SSSI and the Morrich More GCR site. The LSEs on the SSSI and GCR sites do not appear to have been fully assessed against allocations TN04, TN05, TN06, TN10: Blarliath (SSSI only) and TN11: Glenmorangie (SSSI only), and we advise that mitigation is proposed to protect the features of the SSSI and GCR for these allocations within the strategic environmental assessment. We do note that the ER makes reference to mitigation for effects on all known heritage features, but it is unclear what type of heritage features these are. We would, therefore, advise that acknowledgment of the environmental effects from all relevant allocations with regards to the SPAs, SAC, SSSI and GCR are included with the ER for Tain.

7 - Assessment of Development Options - Tore

The likely significant effects (LSEs) on wooded features have not been recognised within the Environmental Report (ER) for Tore. For example, there are potential LSEs on areas of Ancient Woodland and Scottish Semi-Natural Woodland Inventory from allocations TR01: By Woodneuk and TR02: Land North of The Grain Mill.

We would advise that the environmental effects from these sites on the wooded features are included with the ER for Tore.

8 - Assessment of Different Types and Impacts of Environmental Effects

The assessment of different types and impacts of environmental effect isn't clearly shown throughout the whole of the Environmental Report, particularly for the assessment of development options, and we have noted specific examples in other parts of this Annex 1.

9 - Monitoring

Support

10 - Summary of Previous Stages

Support

Appendix 1: Site Assessment Questions, Interpretation and Scoring

Support

Appendix 2: Standard, Allocation Developer Requirement Wording

Support

Spatial Strategy

We are unclear if all of the Spatial Strategy elements of the proposed Plan have been subject to the SEA process. For example, given the spatial element of Map 1 within the proposed Plan, we have been unable to find any assessment of the following: -

Between Settlement Active Travel Network; IMF Hinterland; Sustainable Tourism Potential Growth Areas; and Strategic Renewable Energy Zones. We, therefore, recommend you clarify this and would advise that all of the elements of the Spatial Strategy along with mitigation that needs to be considered at proposal stages are included within the Environmental Report.

Economic Development Areas

While the Economic Development Areas (EDAs) have been assessed and are present on the SEA Site Assessment Online Map, they do not appear to have been included within the Environmental Report (ER). We would, therefore, recommend a section is included within the ER for the Assessment of the Economic Development Areas. Specific comments regarding the detail within the SEA Site Assessments Online Maps for the individual EDAs are detailed further in this Annex 1 below.

Economic Development Areas - CS01: Castle Stuart

We advise that within the Strategic Environmental Assessment, there is mitigation included for the Longman and Castle Stuart Bays SSSI. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

Economic Development Areas - FG01: Fort George

We advise that within the Strategic Environmental Assessment, the Ardersier Glacial Deposits SSSI, Ardersier GCR and the Whiteness Head SSSI are included and that mitigation is also provided. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

The full potential impacts from coastal erosion have not been considered within the SEA in terms of the impacts from flooding and the potential need for engineered defences, and the effects from this to worsen erosion southwards towards Ardersier. We do note within the SEA online mapping tool that the mitigation to address flooding in general, is for potential coastal protection works. We, therefore, do not agree with the mitigation, and would like to see all potential effects included in the assessment along with suitable mitigation which should then be included in the Developer Requirements for this site. We advise that mitigation should include ensuring that built development is avoided near the coastal edge.

Economic Development Areas - HD01: Highland Deephaven

We advise that within the Strategic Environmental Assessment, the Dornoch Firth and Morrich More SAC, Moray Firth SAC and the Cromarty Firth SSSI are included and that mitigation is also provided. This will ensure that all natural or local areas of nature conservation and European sites have been assessed, and that the mitigation for them is considered within the Developer Requirements for this site.

Economic Development Areas - IA01: Inverness Airport Business Park

We advise that within the Strategic Environmental Assessment, mitigation for the Longman and Castle Stuart Bays SSSI is included. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

Economic Development Areas - WH01: Whiteness

We would advise that the Whiteness Head GCR is included in the Strategic Environmental Assessment, plus mitigation for the GCR and the Whiteness Head SSSI is also included. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

General - Natural or Local Areas of Nature Conservation

With regards to the detail within the SEA Site Assessment Online Map, there are a number of natural or local areas of nature conservation that have been assessed as having likely significant effects (LSEs), and in particular, Sites of Special Scientific Interest (SSSI) and Geological Conservation Review (GCR) sites. However, within the assessment, many of these protected sites have not been provided with mitigation measures to protect the features of the SSSIs or GCRs, and subsequently, have not been included as a Developer Requirement within the proposed Plan. Where we believe this to be the case and where we have not already done so, we have provided further detail below in this Annex 1.

Natural or Local Areas of Nature Conservation - DW04: Dochcarty Road East

For the Climate Change SEA topic within the SEA Site Assessments mapping, we note that the conclusion of the SEA post mitigation is that there is still a risk of the development flooding, and has been given a double negative score for likely significant effects. Therefore, it is not clear how the water quality can be safeguarded and that sedimentation and other types of pollution can be prevented from reaching the Cromarty Firth SPA and Cromarty Firth SSSI. We advise that the SEA considers this likely significant effect on both of the SPA and SSSI, along with suitable mitigation which should be included within the Developer Requirements for this site. Please also refer to our comments in Annex 2 for the Habitats Regulations Appraisal.

Natural or Local Areas of Nature Conservation - INC09: Former Longman Landfill West

We would advise that the Longman and Castle Stuart Bays SSSI is included within the Strategic Environmental Assessment along with mitigation. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

Natural or Local Areas of Nature Conservation - INC11: Former Longman Landfill East

We would advise that within the Strategic Environmental Assessment, mitigation for the Longman and Castle Stuart Bays SSSI is included. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

Natural or Local Areas of Nature Conservation - MO03: Recreation and Leisure Areas

We would advise that the Moray Firth SPA is included within this Strategic Environmental Assessment, and that mitigation for this SPA along with the Beaully Firth SSSI is also included. This will ensure that all natural or local areas of nature conservation and European sites have been assessed, and that the mitigation for them is considered within the Developer Requirements for this site.

Natural or Local Areas of Nature Conservation - SB02: Land South of Shore Street

We would advise that within the Strategic Environmental Assessment, mitigation for the Rosemarkie and Shandwick Coast SSSI is included. This will ensure that all natural or local areas of nature conservation have been assessed and that the mitigation for them is considered within the Developer Requirements for this site.

Scottish Environment Protection Agency

We are supportive of the collaborative approach The Highland Council has taken with us to carrying out the strategic environmental assessment for the Plan and are content with the methods used and general assessment of effects. There are a small number of assessments where we slightly disagree with the conclusions and where relevant we will pick these up as part of our response to the draft plan. These mainly seem to be as a result of changes in site boundaries since the MIR, which unfortunately we were not able to identify earlier in the process due to the cyber attack we suffered limiting our ability to engage with the council for some of last year. We would specifically like to commend the Council for their SEA Site Assessment Online Map and hope that more responsible authorities will consider taking a similar approach. We found this a useful and helpful way to present the assessments. We hope it helps the public engage with the plan making process.

How We Responded to the Consultation Authorities' Submissions

Unresolved representations at Proposed Plan stage are a matter for Examination and decision (binding recommendation) by a Scottish Government appointed Reporter rather than by the Council. Below is a summary of the Reporters' recommendations on matters raised by the Consultation Authorities. For the Council's part, we agreed to incorporate all of the Reporters' modifications into the Adopted Plan wording.

Historic Environment Scotland

EDA: Fort George

The Examination Reporter agreed to the requested change(s) and it was (they were) incorporated in the Adopted Plan wording.

NG01 – Nigg Yard

The Examination Reporter bolstered the developer requirement wording to emphasise the need for a developer masterplan with input from and early engagement with key agencies. The Council added this change to the Adopted Plan wording.

NatureScot

Sections 1-5, 9-10 and Appendices

The Council notes and welcomes NatureScot's supportive comments.

6 - Assessment of Policy Options

NatureScot's comments though valid don't necessitate an amendment to the Plan policies themselves. In any planning decision, the approved development plan (including National Planning Framework 4) is to be read as a whole. Caveating each and every individual policy by reference to potentially conflicting interests in another policy would create excessive duplication and, in most cases, confusion for the plan reader. However, NatureScot's concerns are now better referenced in section 6 of this Finalised Environmental Report.

7 - Assessment of Development Site Options

NatureScot's allocation-specific concerns about potential significant adverse effects on biodiversity were addressed at Examination by the Reporters and led to additional developer requirement mitigation being added to the Adopted Plan text. The Habitats Regulations Appraisal process and final Record (available via <https://www.highland.gov.uk/imf>) addressed all potential effects on European sites and similarly led to additional developer requirement mitigation being added to the Adopted Plan text. NatureScot's concerns in relation to allocations DW04: Dochcarty Road East, MB02: Land at Birch Drive, TR02: Land North of The Grain Mill, and Tain sites TN03-TN06 were addressed by the deletion of the sites from the Plan.

The individual SEA site assessments have been updated to incorporate the following specific changes requested by NatureScot.

AL11: Alness Point

Add mitigation that built development be avoided near the coastal edge, and/or is only permitted if there are clear provisions for re-location or demounting if required by coastal change risk. Add mitigation to protect the interest of the SSSI.

AV03: Harbour

Add reference to likely significant effects on the Moray Firth SPA and Moray Firth SAC.

DO01: Land South of Dores Hall

Add reference to likely significant effects on Ancient Woodland Inventory site, biodiversity and landscape.

MO03: Recreation and Leisure Areas and MO05: Land East of Industrial Estate

Add reference to likely significant effects from allocation MO05 on Scottish Semi-Natural Woodland Inventory and on Moray Firth SAC, Moray Firth SPA, Inner Moray Firth SPA and Beaully Firth SSSI from MO03.

NK02: Land Adjoining A9 Junction and NK03: Northbound Car Park

Add reference to likely significant effects from allocations on areas of Ancient Woodland and Scottish Semi-Natural Woodland Inventory

SB02: Land South of Shore Street

Add reference to likely significant effects on the Rosemarkie and Shandwick Coast SSSI (as a result of dune erosion and the need for engineered defences to protect such development) and on the Moray Firth SPA and Moray Firth SAC. Add mitigation that built development is avoided near the coastal edge, and/or is only permitted if there are clear provisions for re-location or demounting if required by coastal change risk.

TN03: Ardlarach Farm, TN04: Croft Arthur, TN05: West of Viewfield Road and TN06: Viewfield

Add reference to likely significant effects and mitigation from these allocations on the Morangie Forest SPA, Dornoch Firth and Morrich More SAC, the Dornoch Firth and Loch Fleet SPA, and the Dornoch Firth SSSI and the Morrich More GCR site.

TN10: Blarliath and TN11: Glenmorangie

Add reference to likely significant effects and mitigation from these allocations on the Dornoch Firth SSSI.

TR01: By Woodneuk

Add reference to likely significant effects on Ancient Woodland and Scottish Semi-Natural Woodland Inventory.

CS01: Castle Stuart

Add mitigation for the Longman and Castle Stuart Bays SSSI.

FG01: Fort George

Add reference to and mitigation for potential adverse effects on the Ardersier Glacial Deposits SSSI, Ardersier GCR and the Whiteness Head SSSI because coastal flooding risks are likely to require engineered defences which are likely to worsen coastal erosion southwards towards Ardersier. Mitigation should be added to ensure that built development is avoided near the coastal edge.

HD01: Highland Deephaven

Add reference to and mitigation for potential adverse effects on the Dornoch Firth and Morrich More SAC, Moray Firth SAC and the Cromarty Firth SSSI.

IA01: Inverness Airport Business Park

Add reference to and mitigation for the Longman and Castle Stuart Bays SSSI.

WH01: Whiteness

Add reference to and mitigation for Whiteness Head GCR.

INC09: Former Longman Landfill West

Add reference to and mitigation for the Longman and Castle Stuart Bays SSSI.

INC11: Former Longman Landfill East

Add reference to and mitigation for the Longman and Castle Stuart Bays SSSI.

8 - Assessment of Different Types and Impacts of Environmental Effects

NatureScot's statement that the Spatial Strategy itself hasn't been specifically SEA'd is correct but the Council has explained that the Plan's vision, outcomes and strategy simply reflect national (NPF4) and Highland approaches that have already been through their respective SEA processes. Tackling the Climate and Ecological Emergency is one of two overarching themes of the Plan and again reflects a strategic approach already taken at national and Highland level. The more specific policies and proposals to which NatureScot refer such as the Hinterland and strategic Active Travel Network improvements are not contained or detailed within this Plan. For example, only a minor boundary change was proposed (and confirmed) to the Hinterland boundary through the Plan process. In any event, these policies and proposals, if and when detailed, are likely to have positive environmental effects (e.g. the Hinterland expansion will further control sporadic development in the open countryside). The Sustainable Tourism Potential Growth Areas and Strategic Renewable Energy Zones have no policy significance beyond their related general policies and site-specific allocations, all of which were assessed through the Plan process and this Report .

Scottish Environment Protection Agency

We thank SEPA for its technical expertise and evidence support in applying the SEA process to the Plan. The Examination Reporter considered SEPA's representations on the Plan itself (rather than the SEA). The results of that consideration are available within the Report of Examination which can be accessed via <http://www.highland.gov.uk/imf>. The Reporter agreed with SEPA in several instances, for example, in the deletion of site DW04 Docharty Road East in Dingwall.

Assessment of Environmental Effects of Reporters' Post Examination Plan Modifications

The Highland Council assessed the likely environmental effects of the Reporters' modifications following the Plan's Examination. This assessment is set out in sections 5 and 6 above, separately in respect of general policies and development sites.

Appendix 1: Site Assessment Questions, Interpretation and Scoring

The following tables set out the 48 detailed questions and scoring criteria we used in assessing each development site option. We believe these cover the 9 SEA topics as relevant to the Plan and its Inner Moray Firth area. Specifically, each topic is covered by the following numbered questions. Please note that there are many overlaps between the topics and therefore only the most relevant question numbers are listed.

Biodiversity, Flora and Fauna: Questions 8,9,10,11,12,

Population and Human Health: Questions

Soil: Questions 16,17,

Water: Questions 1,2,

Air: Question 35

Climatic Factors: Questions 4,5,6,35,36,39

Material Assets: Questions 14,15,18,

Cultural Heritage: Questions 25,26,27,28,29,30,31,32

Landscape: Questions 20,21,22,23,42,43

The following questions cover separate socio-economic considerations; 34,38,40,45,46,47. These are clearly identified as golden coloured rows in the tables that follow.

We ordered the questions into the following 10 sections.

1. Water Environment
2. Climate Change
3. Biodiversity
4. Waste and Natural Resources
5. Landscape
6. Cultural Heritage
7. Sustainable Transport
8. Sustainability of Infrastructure
9. Placemaking
10. Delivery

Each section has more than one question and each question is explained and then given a description of what circumstances would result in each site/proposal being given a pre and post mitigation effect score of:

“--” which means significant negative effects;

“-“ which means minor negative effects;

“+” which means minor positive effects; or

“++” which means significant positive effects.

The full results for all sites are available online at ‘highland.gov.uk/imf’ (click on the background documents link). These are searchable via a map to make it easier for those only interested in a particular site or locality to find the results most relevant to them. The details include the answers to the questions and where relevant an explanation of the scores and any mitigation required to reduce adverse effects and magnify positive effects. If neutral pre-mitigation effects are predicted then the score boxes are left blank and neutral post mitigation effects are referenced in the Post Mitigation comments box.

1 Water Environment

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
1. Will the proposal have a direct effect on a named River Basin Management Plan water body?	Identify relevant RBMP body and confirm its status. Consider site's potential effects and any actions being carried out or proposed by relevant Area Advisory group	Large scale physical changes to the water body required - such as re-routing or hard engineering – which will effect status of water body	Small physical changes to the water body required - such as new watercourse crossings	Small physical improvements - such as improved watercourse crossings – proposed or covered by developer requirement	Large scale physical improvements – such as river restoration works, removal of abandoned structures – proposed or covered by developer requirement. Developer requirement covering Advisory Group Action.
2. Will the proposal have a direct impact on any other surface water bodies that policy mitigation will not adequately protect?	Consider if the proposal will require direct physical impacts like watercourse crossings, de- culverting or large scale abstraction	Large scale physical changes to the water body required - such as re-routing or hard engineering	Small physical changes to the water body required - such as new watercourse crossings	Small physical improvements - such as improved watercourse crossings – proposed or covered by developer requirement	Large scale physical improvements – such as river restoration works, removal of abandoned structures – proposed or covered by developer requirement.
3. Post-mitigation score	Taking all questions into account, score, with mitigation, site's effects on water environment	Proposal could have significant negative impact on the water environment	Proposal could have a minor negative impact on water environment	Proposal could have a small or local scale positive impact on water environment	Proposal could have significant/widespread positive impact on water environment

2 Climate Change

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
4. Will the proposal be affected by or have an impact on existing flood risk areas?	Use the SEPA 1 in 200 year Flood Map and Historic River Events (Coastal and Fluvial Flood Risk) Consult the advice provided SEPA and THC flood team for local flooding events	>50% of the site is within an area of known flooding or within an indicative map area	1-50% of the site is within or adjacent to an area of known flooding or within or adjacent to an indicative map area	Including a Developer Requirement for detailed Flood Risk Assessment and that no development to take place in areas at risk of flooding	Including a Developer Requirement for detailed Flood Risk Assessment and that no development to take place in areas at risk of flooding and that delivers flood risk benefits elsewhere

5. Will the proposal be affected by or have an impact on predicted climate change flood risk areas (1 in 1000 year flood map)?	Use the SEPA 1 in 1000 Flood Map (Coastal and Fluvial Flood Risk) Consult the advice provided by THC flood team for local flooding events	>50% of the site is within an area of known flooding or within an indicative map area	1-50% of the site is within or adjacent to an area of known flooding or within or adjacent to an indicative map area	Including a Developer Requirement for detailed Flood Risk Assessment and that no development to take place in areas at risk of flooding	Including a Developer Requirement for detailed Flood Risk Assessment and that no development to take place in areas at risk of flooding and that delivers flood risk benefits elsewhere
6. Is the proposal in a coastal location? Is it likely to be affected by or have a significant effect on coastal erosion or natural coastal processes?	Use the Dynamic Coast Webmap to identify any coastal erosion issues related to site	The proposal is in an area of significant coastal erosion and/ or will have a significantly negative impact on coastal erosion	Proposal is in an area of minor coastal erosion and/ or will have a minor negative impact on coastal erosion	Proposal includes mitigation to address local erosion issues	Proposal includes mitigation that will address widespread erosion issues
7. Post-mitigation score	Taking all of the questions into account, score, with mitigation identified, score the proposal against climate change	The proposal is at risk of significant flood or coastal erosion risk and/or would have a significantly negative impact on coastal erosion	The proposal is at risk of flood or minor coastal erosion risk and/or would have a minor negative impact on coastal erosion	The proposal could help to mitigate impacts of local flooding and/or erosion issues	The proposal could help to mitigate impacts of widespread flooding and/or erosion issues

3 Biodiversity

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
8. Will the proposal have a significant effect on national or local areas protected for nature conservation?	Consider all national and local designations in the GIS project/ constraint maps provided (SSSI, NNR, MPA, LNRs)	Development of proposal could have a likely significantly negative effect on national or local areas protected for nature conservation	Development of proposal could have minor negative effect on national or local areas protected for nature conservation	Development of proposal could make a minor contribution to enhancing the integrity of national or local areas protected for nature conservation	Development of proposal could make a significant contribution to enhancing the integrity of national or local areas protected for nature conservation
9. Will the proposal be within, adjacent to, or have connectivity with a European site?	Consider all European Designations in the GIS project constraints maps provided (SPA, SAC)	Development of proposal could have a likely significantly negative effect on European areas protected for nature conservation – flag up HRA required	Development of proposal could have minor negative effect on European areas protected for nature conservation – flag up HRA required	Development of proposal could make a minor contribution to enhancing the integrity of European areas protected for nature conservation	Development of proposal could make a significant contribution to enhancing the integrity of European areas protected for nature conservation

<p>10. Will the proposal have a significant effect on non-designated features (geological conservation review sites, ancient woodlands, Tree Preservation Orders.)?</p>	<p>Consider non-designated features in the GIS project</p>	<p>Development of proposal could have a likely significantly negative effect on non-designated features</p>	<p>Development of proposal could have a minor negative effect on non-designated features</p>	<p>Development of proposal could make a minor positive contribution to on non-designated features</p>	<p>Development of proposal could make a significant positive contribution to enhancing non-designated features</p>
<p>11. Will the proposal have a significant effect on protected species (e.g. European Protected Species, protected mammals, etc.)?</p>	<p>Consider designated proposal in the GIS project as well as woodlands, watercourses and other habitat sensitivities (bats, otters, red squirrel and badgers)</p>	<p>A protected species licence will require to be obtained in order for development to proceed</p>	<p>Protected Species present - further assessment will be required to identify appropriate mitigation to avoid adverse effect</p>	<p>Proposal would lead to a minor enhancement in the connectivity of a habitat corridor or network for movement of wildlife</p>	<p>Proposal would lead to a significant enhancement in the connectivity of a habitat corridor or network for movement of wildlife</p>
<p>12. Will there be significant effect on habitat connectivity (e.g. drainage affecting water levels, tree removal etc.)?</p>	<p>Consider green network connections and how these could be severed or enhanced by the proposal</p>	<p>Proposal would significantly fragment a habitat corridor or network for movement of wildlife, or lead to a significant loss of habitat</p>	<p>Proposal would have a minor negative effect on a habitat corridor or network for movement of wildlife,</p>	<p>Proposal would lead to a minor enhancement in the connectivity of a habitat corridor or network for movement of wildlife,</p>	<p>Proposal would lead to a significant enhancement in the connectivity of a habitat corridor or network for movement of wildlife</p>
<p>13. Post-mitigation score</p>	<p>Taking all of the questions into account, score, with mitigation identified, score the site against Biodiversity</p>	<p>Proposal would have a significant adverse impact on biodiversity</p>	<p>Proposal would have a minor adverse impact on biodiversity</p>	<p>Proposal would have a minor positive impact on biodiversity</p>	<p>Proposal would have a significant positive impact on biodiversity</p>

4 Waste and Natural Resources

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
14. Will the proposal affect quantity, quality or connectivity of open space or the wider green network?	Consider relevant open space audit, OS base and aerial photography of site and wider area.	Proposal would have a significant negative impact on quality, quantity (development of 50% or more of a site valued for its open space/green network), and/or connectivity of open space or the wider green network	Proposal would have a minor negative impact on quality, quantity (development of up to 50% of a site valued for its open space/green network), and/or connectivity of open space or the wider green network	Improves/enhances green network connectivity, or key access network and/or improved access to open space	Proposal would significantly contribute to greater connectivity of green network or open space
15. Will the proposal be on vacant or derelict land, or on other previously used land (brownfield land, potentially contaminated land)?	Check THC Vacant and Derelict Land Survey online. Has the site been used previously- check site history, aerial photography, comments from Contaminated Land Team	Proposal in an area with major potential contamination issues	Proposal in an area with a small amount of potential contamination issues	Minor redevelopment of vacant, derelict or brownfield land and/ or by Including Developer Requirements could facilitate remediation or minor potential contamination issues	Significant/large scale redevelopment of vacant, derelict or brownfield land and/ or by including Developer Requirements could facilitate remediation of major potential contamination issues
16. Will the proposal cause significant effects on carbon rich soils or wetlands?	Check GIS data - SNH Carbon and Peatland Mapping 2016 with importance of 1 or 2	>50% of site is within an area of carbon rich soils/ peat/ wetlands	1-50% of site is within an area of carbon rich soils/ peat/ wetlands	Proposal or Developer Requirement would safeguard a small area of carbon rich soil/wetlands from disturbance	Proposal or Developer Requirement would safeguard a large area of carbon rich soil/wetlands from disturbance
17. Will the proposal effect good quality agricultural soils or locally important croft land?	For good quality agricultural soils check GIS data LCA score 3.1 or above (prime agricultural land); for croft land check Crofts GIS layer and aerial photos to indicate productivity	>50% of site is within an area of prime agricultural land or locally important croft land	1-50% of site is within an area of prime agricultural land or locally important croft land	Could give small scale/local protection to good agricultural land or locally important croft land	Could provide significant protection to good agricultural land or locally important croft land
18. Is the proposal adjacent to a waste management site and could compromise its operation?	Check GIS, consider comments from THC Waste and SEPA. Waste recycling points not included as important to close to source recycling and a relatively good neighbour use.	Large scale proposal with sensitive receptors will surround a waste management site and could therefore have a significant negative effect on its operation	Smaller scale proposal with sensitive receptors will be sited next to a waste management site and could therefore have a minor negative effect on its operation	Including Developer Requirements could secure mitigation to address an existing issue/protect the existing waste handling operation	Including Developer Requirements could secure mitigation to address an existing issue/protect the existing waste handling operation and support its expansion

19. Post-mitigation score	Taking all of the questions into account, score, with mitigation identified, score the site against Waste & Natural Resources	Site would have a significant adverse impact on Waste & Natural Resources	Site would have a minor adverse impact on Waste & Natural Resources	Site would have a minor positive impact on Waste & Natural Resources	Site would have a significant positive impact on Waste & Natural Resources
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5 Landscape

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
20. Will there be significant effects on sites designated for landscape interests?	Use GIS Data to identify NSAs and SLAs	Proposal is within or would affect a national or local designated landscape and would lead to a significant loss of or impact on the key features or special landscape qualities	Proposal is within or would affect a national or local designated landscape and would lead to a minor loss or impact on the key features or special landscape qualities	Proposal offers minor or local enhancement to a national or local designated landscape	Proposal significantly enhances the qualities of a national or local designated landscape
21. Will there be significant effects on Wild Land Areas?	Use GIS Data to identify WLAs	Proposal is within or would affect a WLA and would lead to a significant loss of or impact on the key features or special qualities or attributes	Proposal is within or would affect a WLA and would lead to a minor loss or impact on the key features or special qualities or attributes	Proposal offers minor or local enhancement to a WLA	Proposal significantly enhances the qualities of a WLA
22. Will the proposal have significant effects on landscape character and/or visual amenity	Review relationship to underlying landform and relationship to key characteristics and local features (woodland, cultural features, water bodies, coastline etc.) and landscape pattern	The proposal intrudes upon enclosing slopes and is highly visually prominent within the surrounding landscape; The development requires the removal of key landscape characteristics, or dominates over key characteristics and important local features reducing the sense of identity	The proposal sits on enclosing slopes and is visually prominent within the immediate landscape; The development erodes key characteristics and intrudes upon the clarity of key characteristics and local features reducing the sense of identity	The proposal responds well to the local landform; The development maintains the existing underlying landform and experience of key characteristics and features	The proposal is well sited and responds well to the local landform improving creating a cohesive and robust settlement edge; The development reinforces the existing landscape character and creates new opportunities for enjoying key local features

<p>23. Will the proposal have significant effects on the existing settlement character?</p>	<p>Review location; physical visual connectivity; settlement character – cultural, form, scale, pattern, density; separation between settlements; definition of settlement edge</p>	<p>Proposal is physically and visually isolated from the existing settlement edge; Dominates over the scale of the existing settlement and proposal form is contrary to the existing density and pattern of the settlement. The development coalesces with adjacent settlement(s), such that the distinctive identity of individual settlements is lost.</p>	<p>Proposal has a poor relationship in response to the existing settlement form, and is contrary to the existing density and pattern of the existing settlement. The development erodes the separation between settlements and impacts on the identity of individual settlements.</p>	<p>Proposal physically and visually responds to the existing settlement form and improves the settlement edge. Development maintains settlement setting and avoids cohesion with adjacent settlements. The development maintains the existing separation between individual settlements.</p>	<p>Proposal physically and visual responds well to the existing settlement creating a cohesive and well defined settlement edge. The well sited settlement contributes to a robust well defined edge creating a distinctive gateway or approach to the settlement, maintaining separation.</p>
<p>24. Post-mitigation score</p>	<p>Taking all of the questions into account, score, with mitigation identified, score the site against Landscape</p>	<p>Site would have a significant adverse impact on Landscape</p>	<p>Site would have a minor adverse impact on Landscape</p>	<p>Site would have a minor positive impact on Landscape</p>	<p>Site would have a significant positive impact on Landscape</p>

6 Cultural Heritage

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
<p>25. Will the proposal have significant effects on scheduled monuments or their setting?</p>	<p>Scheduled Monuments GIS data Historic Environment Policy for Scotland Managing Change in the Historic Environment: Setting</p>	<p>Development of site would lead to loss or major alteration of components of a scheduled monument or its setting</p>	<p>Development of site would have a minor negative impact on a scheduled monument and/or its wider setting</p>	<p>Proposal would result in minor enhancement of the setting of a scheduled monument and/or proposal will enable better access to a scheduled monument</p>	<p>Major enhancement of the setting of a scheduled monument</p>
<p>26. Will the proposal have significant effects on locally important archaeological sites?</p>	<p>Highland Historic Environment Record GIS data</p>	<p>Development of site would lead to loss or major alteration of components of a locally important archaeological site or its setting</p>	<p>Development of site would have a minor negative impact on a locally important archaeological site and/or its wider setting</p>	<p>Proposal would result in minor renovation/regeneration of locally important archaeological sites and/or proposal will enable better access to locally important archaeological sites and/or minor enhancement of the setting of a locally important archaeological site</p>	<p>Large-scale redevelopment and reuse a locally important archaeological site and/or enhancement of the setting of locally important archaeological site</p>
<p>27. Will the proposal have significant effects on listed buildings or their setting?</p>	<p>Listed Building GIS data Managing Change in the Historic Environment: Setting</p>	<p>Development of site would lead to loss or major alteration of components of a listed building and/or its setting</p>	<p>Development of site would have a minor negative impact on a listed building and/or its wider setting</p>	<p>Renovation/ regeneration of listed buildings lying empty/ at risk and/or proposal will enable better access to listed building and or minor enhancement of the setting of a listed building</p>	<p>Large-scale redevelopment and reuse of a listed building and/or enhancement of the setting of a listed building</p>
<p>28. Will the proposal have significant effects on a Conservation Area?</p>	<p>Conservation Area GIS data</p>	<p>Development of site would lead to loss or major alteration of components of a conservation area or its setting</p>	<p>Development of site would have a minor negative impact on a conservation area and/or its wider setting</p>	<p>Proposal will result in minor renovation/ regeneration of a conservation area and /or will enable better access to a conservation area</p>	<p>Proposal will result in large-scale regeneration or a conservation area</p>

<p>29. Will the proposal have significant effects on Garden and Designed Landscapes?</p>	<p>GIS data HES Inventory Search tool Managing Change in the Historic Environment: GDLS Managing Change in the Historic Environment: Setting</p>	<p>Development of site would lead to loss or major alteration of components of a garden and designed landscape or its setting</p>	<p>Development of site would have a minor negative impact on a garden or designed landscape and/or its wider setting</p>	<p>Proposal will result in minor renovation/regeneration of a garden and designed landscape and /or will enable better access to a garden and designed landscape</p>	<p>Proposal will result in large scale renovation/regeneration of a garden and designed landscape and /or will significantly improve access to a garden and designed landscape</p>
<p>30. Will the proposal have significant effects on an Inventory Historic Battlefield?</p>	<p>GIS data HES Inventory Search tool Managing Change Guidance in the Historic Environment: Battlefields Managing Change in the Historic Environment: Setting</p>	<p>Development of site would lead to loss or major alteration of components of a historic battlefield or its setting</p>	<p>Development of site would have a minor negative impact on a historic battlefield and/or its wider setting</p>	<p>Proposal will result in minor benefits to the protection and management of the battlefield through understanding and appreciation, education and research or community and visitor interest.</p>	<p>Proposal will result in large scale benefits to the protection and management of the battlefield through understanding and appreciation, education and research or community and visitor interest.</p>
<p>31. Will the proposal have significant effects on a World Heritage Site?</p>	<p>Not relevant to IMF Plan so response will always be 'no' (question retained for future SEA work when the Flow Country may become a WHO)</p>	<p>Development of site would lead to loss or major alteration of components of a World Heritage Sites or its setting</p>	<p>Development of site would have a minor negative impact on a World Heritage Site and/or its wider setting</p>	<p>Proposal will result in minor renovation/regeneration of a World Heritage Site and /or will enable better access to a World Heritage Site</p>	<p>Proposal will result in large scale renovation/regeneration of a World Heritage Sites and /or will significantly improve access to a World Heritage Site</p>
<p>32. Can the proposal enhance or improve public access to the historic environment?</p>	<p>Historic Environment and Access GIS data</p>	<p>Development of site would have a significant negative impact on access to historic environment features within or close by the site</p>	<p>Development of site would have a minor negative impact on access to historic environment features within or close by the site</p>	<p>Proposal will result in minor access improvements to the historic environment features within or close to the site</p>	<p>Proposal will result in significant access improvements to the historic environment features within or close to the site</p>
<p>33. Post-mitigation score</p>	<p>Taking all of the questions into account, score, with mitigation identified, score the site against Cultural Heritage</p>	<p>Site would have a significant adverse impact on Cultural Heritage</p>	<p>Site would have a minor adverse impact on Cultural Heritage</p>	<p>Site would have a minor positive impact on Cultural Heritage</p>	<p>Site would have a significant positive impact on Cultural Heritage</p>

7 Sustainable Transport

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
<p>34. Will this proposal require significant new transport infrastructure?</p>	<p>If the site can be served by constructing only minor connections to walking, cycling or public transport infrastructure (e.g. short path connections to existing routes and stops) or road infrastructure (e.g. tying into road end stubs) this is not considered significant new infrastructure.</p>	<p>Major junction or other network improvements required.</p>	<p>Significant upgrading of junctions or other network improvements required</p>	<p>Minor improvements required but will enable significant new development where active travel and public transport will be possible</p>	<p>Minor improvements required but will enable significant new development where active travel and public transport will be prioritised</p>
<p>35. Will this proposal increase the need to travel by car, increasing carbon emissions and therefore exacerbating climate change? i.e. will it hinder the delivery of the modal hierarchy: 1. Walking 2. Cycling 3. Public Transport 4. Freight 5: Car share/taxi 6. Private Car</p>	<p>A proposal that is remote from (more than one) services and facilities (e.g. shops, schools, health services and places of work), or remote from its labour force where proposed use is employment could increase the need for travel by car and cannot therefore be considered sustainable. If a site is outwith the distance thresholds here, but is well served by public transport (frequent bus or rail services with at least half-hourly service throughout day at least 7am-10pm) it may not increase the need to travel by car.</p>	<p>The site is very remote (2km or more) from services and facilities and could create a significant increase in private car use</p> <p>The site, or access to it, has steep slopes, is elevated and on an exposed position that would be a significant deterrent to making an active travel choice</p>	<p>The site is somewhat remote (1-2 km) from services and facilities and could create an increase in private car use</p> <p>The site, or access to it, has some steep slopes and/or is exposed, reducing the attractiveness of active travel</p>	<p>Site is close to most services and facilities and is not steep to access nor exposed, making active travel a possible option</p>	<p>Site is close to almost all services and facilities and not steep to access nor exposed, making active travel a possible travel option</p>

<p>36. Will the development of the site impact on core paths and other active travel networks that could reduce the attractiveness of carbon neutral travel options (inc. pedestrian priority/desire lines)?</p>	<p>How will the site affect core paths or other access and path networks, such as long distance routes, cycle paths and rights of way. Will development sever, impede or adversely impact an existing route?</p>	<p>Development of site would have a significant adverse impact on existing active travel networks</p>	<p>Development of site would have a minor adverse impact on existing active travel networks</p>	<p>Proposal will result in minor enhancements of the active travel network</p>	<p>Proposal will result in major enhancements of the active travel network</p>
<p>37. Post-mitigation score</p>	<p>Taking all of the environmental questions into account, score, with mitigation identified, score the site against Sustainable Transport</p>	<p>Site would have a significant adverse impact on Sustainable Transport</p>	<p>Site would have a minor adverse impact on Sustainable Transport</p>	<p>Site would have a minor positive impact on Sustainable Transport</p>	<p>Site would have a significant positive impact on Sustainable Transport</p>

8 Sustainability of infrastructure

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
<p>38. Will primary and secondary schools experience capacity issues due to this proposal?</p>	<p>What are the school capacities and how many additional places will be created by this development. See School Roll Forecast Each house= 0.33 primary 0.13 secondary Each 2bed+ flat= 0.17 primary 0.07 secondary If assessing an allocated site, need to check HLA to see if site is already factored into school roll forecast.</p>	<p>School capacities are forecast or are already breached and/or will be significantly breached by this development and limited scope to address capacity issues caused</p>	<p>School capacities will be breached by this development and only limited scope to address capacity issues caused</p>	<p>Schools are under capacity and places are readily available and the site could help sustain it/them</p>	<p>Schools are significantly under capacity and site could help sustain it/them</p>

<p>39.</p> <p>Will the site use fossil fuel for heat and energy, therefore exacerbating the effects of climate change?</p> <p>i.e. is there no opportunity to be able to viably create or connect to a heat or energy network?</p>	<p>What opportunities does the proposal offer to deliver sustainable heat and energy? Key factors when considering viability are:</p> <p>Scale, density and use of development proposed (heat demand)</p> <p>Opportunities to connect to neighbouring land uses which may provide anchor loads or require a heat source. (heat demand/ supply)</p> <p>Expected length of pipework required to connect to or create a heat network. (infrastructure)</p>	<p>It will not be viable to develop or connect to a heat network. Site will be dependent on off-grid fossil fuel energy for some or all of its energy and heating needs.</p>	<p>It is unlikely to be viable to develop or connect to a heat network. There are no existing or proposed heat network or heat sources near the site. Viable connection to the existing mains gas network.</p>	<p>Site may provide an opportunity to develop a district heat network. Site is located close to an existing or proposed heat network, potential anchor load or heat source.</p>	<p>Site provides a good opportunity to develop a district heat network. Site is located adjacent to an existing or proposed heat network, potential anchor load or heat source.</p>
<p>40.</p> <p>Are there mains water and sewerage challenges for the site?</p>	<p>Check the GIS data. Scottish Water comments</p>	<p>No connection to water or sewerage possible</p>	<p>Connections are present but major upgrading of infrastructure are required to connect site</p>	<p>Allocating site would make a minor contribution to improving public water or sewerage infrastructure issues</p>	<p>Allocating site would make a major contribution to improving public water or sewerage infrastructure issues</p>
<p>41.</p> <p>Post-mitigation score</p>	<p>Taking all of the questions into account, score, with mitigation identified, score the site against Sustainability of infrastructure</p>	<p>Site would have a significant adverse impact on Sustainability of infrastructure</p>	<p>Site would have a minor adverse impact on Sustainability of infrastructure</p>	<p>Site would have a minor positive impact on Sustainability of infrastructure</p>	<p>Site would have a significant positive impact on Sustainability of infrastructure</p>

9 Placemaking

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
42. Will the development fail to deliver on all of the six qualities of successful places?	The six qualities of successful places are set out as: distinctive; safe and pleasant; easy to move around; welcoming; adaptable; and resource efficient	Proposal will not deliver on any of the six qualities	Proposal will not deliver on most of the six qualities	Proposal will deliver on most of the six qualities and with Developer Requirements can address those remaining	Proposal is of a quality to deliver all of the qualities and could be used as a Highland exemplar of placemaking
43. Will the proposal impact on the placemaking priorities for the settlement/area?	The site's/proposal's fit with the wider settlement.	Development would undermine key characteristics of the place and/or its placemaking priorities	Development would undermine some of the placemaking priorities	Development respects and would help deliver the placemaking priorities	Development would make a significant contribution to realising key placemaking priorities
44. Post-mitigation score	Taking all of the questions into account, score, with mitigation identified, score the site against Placemaking	Site would have a significant adverse impact on Placemaking	Site would have a minor adverse impact on Placemaking	Site would have a minor positive impact on Placemaking	Site would have a significant positive impact on Placemaking

10 Delivery

Question	Explanation	-- Significant negative	- Minor negative	+ Minor positive	++ Significant positive
45. Will developer contributions (financial commuted sums) be needed?	Use the Developer Contributions SG and Delivery Programme to consider likely contributions required.	Contributions over £7,000 per house. This may make the site unviable due to less incentive for the landowner to release the land, or impact on profit margin of developer.	£0 to £6,999	Development can be accommodated by existing infrastructure	Development will help to sustain existing facilities which are currently well under capacity
46. Are there abnormal costs that could impact the sites delivery (e.g. physical constraints, topography etc.)?	Are there major constraints to development (e.g. physical constraints, topography etc.) that would incur significant costs to rectify/ that would limit capacity of site to accommodate development	Major abnormal costs are present that could present significant physical or financial barriers to overcome	Some abnormal costs are present that could present some physical or financial barriers to overcome	No abnormal costs	Site preparation complete and service connections available at boundary
47. Are there any significant landownership issues which need to be overcome?	How will landownership impact delivery of the site- if a housebuilder is involved, this can be perceived as being positive	Major landownership issues, no evidence of developer involvement	Landownership issues which are likely to be resolved in the short term. There is uncertainty over the availability of the land for development, no evidence of developer involvement.	Developer involved in site. No ownership issues at present but there are multiple owners.	Developer involved in site. Site and access is owned by a single landowner/developer who is proactively looking to release/develop the land.
48. Post-mitigation score	Taking all of the socio-economic questions into account, score, with mitigation identified, score the site against Delivery	Site would have a significant adverse impact on Delivery	Site would have a minor adverse impact on Delivery	Site would have a minor positive impact on Delivery	Site would have a significant positive impact on Delivery

Appendix 2: Standard, Allocation Developer Requirement Wording

Below is a list of the standard wording used in the allocation developer requirements for the Inner Moray Firth Proposed Local Development Plan in relation to each SEA topic. The list takes account of the wording used in recent Highland local development plans and feedback from SEPA, NatureScot, Historic Environment Scotland and the Council's forestry and other officers. The list is not exhaustive and phrasing has been tailored for each development site to minimise repetition and maximise brevity and relevance. Habitats Regulations Appraisal (HRA) inspired requirements are not listed here but in the separate HRA Record.

Water Environment

- Where there are watercourses within the site or adjacent to it (and existing riparian area is less than 6m wide): *Protect and where possible enhance watercourses/features, provide buffer of at least 6m from built development, any crossings should be bottomless arched culverts or traditional style bridges, no culverting for land gain.*
- Where there are watercourses within the site or adjacent to it and the riparian area is already greater than 6m wide: *Protect and where possible enhance watercourses/features. The existing riparian area should be protected. Any crossings should be bottomless arched culverts or traditional style bridges. No culverting for land gain.*
- Morphological improvements - *measures to improve watercourse morphology required.*

Climate Change

- *Flood Risk Assessment (no development in areas shown to be at risk of flooding)*
- *Drainage Impact Assessment*
- For harbour and similar sites: *Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures.*
- *Coastal protection works may be required*
- *Public sewer connection*
- For very few sites where connection might be an issue: - *Connection to public sewer presumed unless feasibility study shows this is not possible*

Biodiversity

- *Construction and Environment Management Plan*
- *Tree/woodland Survey and Management Plan.*
- *Protect and enhance existing woodland and individual trees, create new woodland where opportunities exist*
- *Protect, enhance, integrate with existing green/blue networks*
- *Any permanent woodland removal to be assessed against Scottish Government Control of Woodland Removal policy*
- *Compensatory tree planting*
- *Planting plan for biodiversity enhancement measures (such as tree planting, wildflower meadow, hedges)*
- *Habitat Survey*
- *Protected Species Survey*
- *Recreational Management Plan (for example, where site is adjacent to capercaillie SPA, or to provide opportunities to connect with nature)*

Waste and Natural Resources

- *Site history and possible Land Contamination Site Investigation*
- *Land Contamination Site Investigation*
- *Demonstrate how reuse or recycling of existing site building materials has been maximised*

- *Landscape/Design*
- *Landscape and Visual Impact Assessment*
- *High quality siting and design that will avoid adverse impacts on the special qualities of the xxx NSA*
- *High quality siting and design with positive contribution to the streetscape/settlement settings*
- *Assessment and resolution of any slope stability issues*
- *Landscaping scheme which... (for example, integrates with the green network)*

Cultural Heritage

- For sites affecting a scheduled monument, or its setting: *Safeguard fabric, historic character and/or setting of the Scheduled Monument*
- For sites affecting a listed building, its curtilage or setting: *Safeguard the fabric, historic character and/or setting of the Listed Building*
- *Support sensitive development within the curtilage of the Listed Building*
- *Redevelopment of listed building to be responsive, sensitive and appropriate to its historic character*
- *For sites within or affecting a Conservation Area, or its setting: Safeguard the architectural and historic character and setting of the conservation area, including appropriate design and materials*
- *Proposals must accord with the Conservation Area Appraisal and/or Management Plan (where available)*
- For sites within or affecting an Inventory Battlefield, or its setting: *Safeguard Battlefield (and its setting); consider potential effects with reference to Inventory*
- For sites within or affecting an Inventory Garden and Designed Landscape, or its setting: *Safeguard Garden and Designed Landscape (and its setting), including appropriate design and materials; consider potential effects with reference to Inventory*
- For sites affecting archaeological sites or their setting, or sites of archaeological potential: *Programme of work for the evaluation, preservation and recording of any archaeological and historic features*
- *Development that directly impacts archaeological remains must undertake appropriate archaeological survey and recording; preference for avoidance by design and preservation in situ of any remains*
- *Establish any presence of archaeological remains in advance of or during development (if site already identified as likely to be of archaeological interest)*
- *Demolition or renovation of undesignated historic building must have photographic record prior to development*

Sustainable Transport

- *Transport Assessment (including details of... if needed)*
- *Transport Statement (including details of... if needed)*
- *Access Management Plan*
- *Road widening and footpath provision*
- *Retain and where possible enhance the core path network*
- *Improve active travel linkages outwith the site - be specific where possible*
- *Safeguard and improve quality and integrity of existing active travel routes*
- *Provision of a lights controlled pedestrian crossing on the X road.*
- *Reduced car parking standards are acceptable on site with demonstration of appropriate alternative public transport and active travel mitigation.*

Other SEA Related

- *Noise assessment*
- *Air quality (odour) assessment*



