

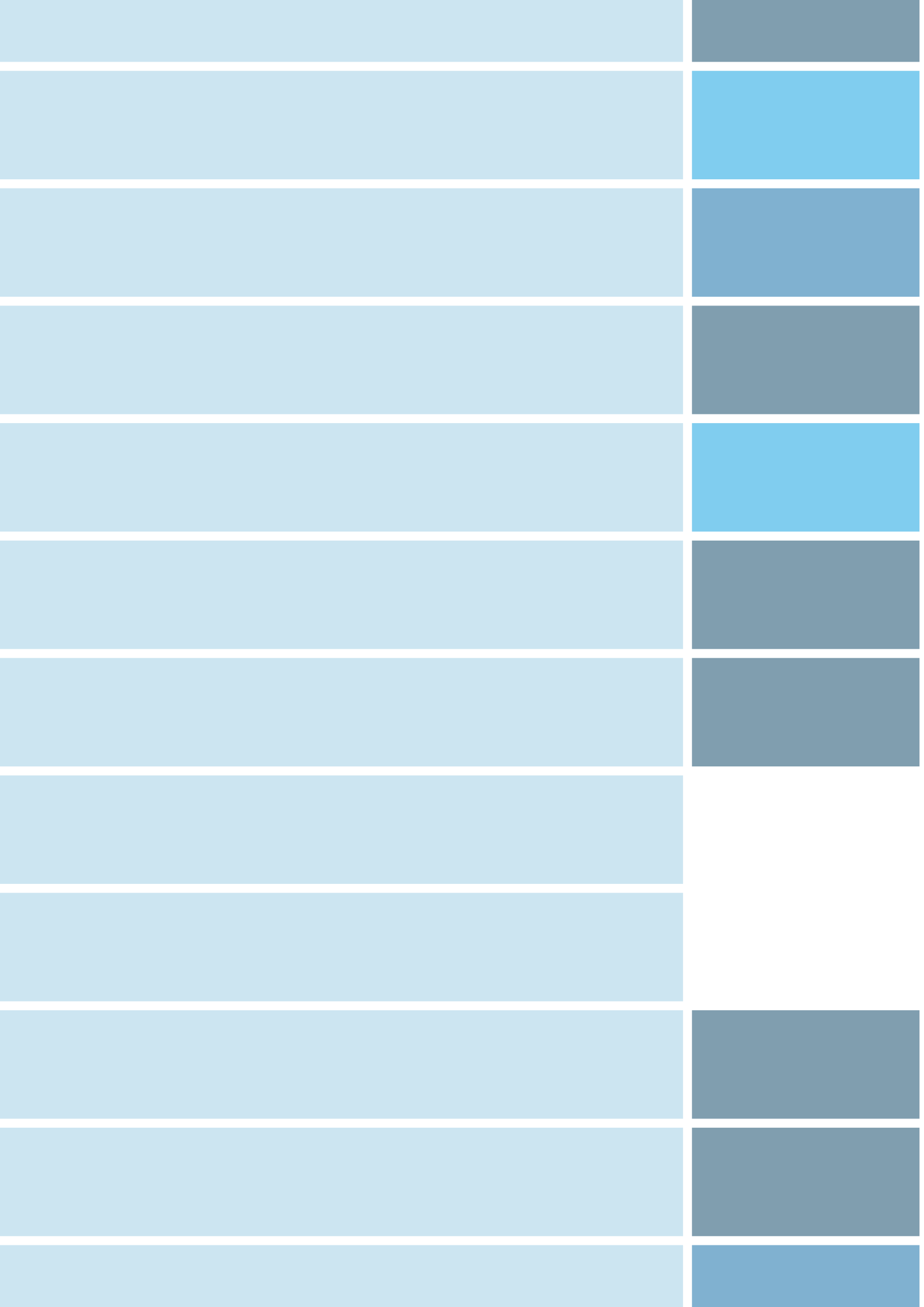
Inner Moray Firth Local Development Plan 2 Strategic Environmental Assessment

Plana Leasachaidh Ionadail Linne Mhoireibh A-Staigh 2 Measadh Àrainneachd Ro-innleachdail

July 2024

Post-Adoption Statement

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POST-ADOPTION STRATEGIC ENVIRONMENTAL ASSESSMENT STATEMENT INNER MORAY FIRTH LOCAL DEVELOPMENT PLAN 2

0 INTRODUCTION AND CONTENTS

0.1 This is the Post-Adoption Statement for the Inner Moray Firth Local Development Plan 2 (abbreviated to IMFLDP2 from this point forward), which was adopted and constituted on 27 June 2024 by The Highland Council (THC), which is the Responsible Authority for Strategic Environmental Assessment (SEA) purposes. It has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005, which requires that the Statement's contents to cover the following matters.

1. How environmental considerations have been integrated into the IMFLDP2;
2. How the IMFLDP2's Environmental Report has been taken into account;
3. How the opinions expressed in response to the consultations on the IMFLDP2's Environmental Report have been taken into account in the preparation of the IMFLDP2;
4. The reasons for choosing the IMFLDP2, as approved, in the light of other reasonable alternatives; and
5. the measures that are to be taken to monitor the significant environmental effects of implementation of the IMFLDP2.

0.2 The IMFLDP2 and its other accompanying SEA documentation can be viewed online <http://www.highland.gov.uk/imf>. This includes the Finalised Environmental Report (FER) published in July 2024 which includes updates to take account of the comments which were raised by Consultation Authorities (CAs) since the publication of the Revised Environmental Report (published in March 2022).

0.3 Please note that **this Post-Adoption Statement is only a brief summary of the matters listed above. This Statement cross refers to, rather than duplicates, the detail of the Plan's SEA process, which is set out within the Finalised Environmental Report. Those parties interested in the full account of the process should read this Statement in conjunction with Finalised Environmental Report.**

1 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE IMFLDP2

1.1 The table below summarises the integration of the IMFLDP2 and the SEA processes. The FER provides far greater detail of each stage.

Timescales	Plan Process / Stage	SEA and Habitats Regulations Appraisal (HRA) Process / Stage
Complete (Summer 2019)	Call for Sites & Ideas published	Preparation and submission of Scoping Report to CAs Consideration of CAs comments
Complete (January 2021)	Main Issues Report published	Draft Environmental Report published and submitted to CAs Consideration of CAs comments
Complete (March 2022)	Proposed Plan published	Revised Environmental Report and draft HRA published and submitted to relevant CAs Consideration of CAs comments
Complete (March 2023- January 2024)	Examination of unresolved representations on Plan and Report of Examination published	Reporters' consideration of SEA and HRA related representations Consideration of environmental effects of Reporters' modifications
Complete (June-July 2024)	Plan adopted	Adopted Plan, Post adoption SEA Statement, Finalised Environmental Report and finalised HRA published and submitted to relevant CAs

2 HOW THE IMFLDP2'S ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

2.1 The Draft and Revised Environmental Report and the CAs comments on these documents helped define and formulate the IMFLDP2's environmental baseline, its environmental risks and opportunities, its development site and policy selection, and its development site developer requirement mitigation text.

2.2 The CAs inputted at all the formal SEA and HRA stages directly to influence general policy and site developer requirement text and the reduction and/or deletion of particular development site options. Developer requirements have been added to enhance positive environmental effects as well as to mitigate negative effects. The Council and CAs, through the Environmental Report process, agreed a standardised Site Assessment list of questions, interpretation and scoring and also a standardised list of appropriate developer requirement site mitigation text. Further details are provided within the appendices of the FER.

2.3 The draft Environmental Report, included assessment of all development site options within and adjoining the main settlements and provided one of the main sieves to identify sites

that were and were not preferred by the Council at Main Issues Report stage. The first principle of avoidance of adverse environmental effects was applied during that initial sieving process.

3 HOW THE OPINIONS EXPRESSED IN RESPONSE TO THE CONSULTATIONS ON THE IMFLDP2'S ENVIRONMENTAL REPORT HAVE BEEN TAKEN INTO ACCOUNT IN THE PREPARATION OF THE IMFLDP2

3.1 Section 10 of the FER provides the full detail of comments received from the CAs and how they have influenced the IMFLDP2 content.

3.2 This detail demonstrates that the CAs comments have been influential in shaping the Plan's policy wording, development site selection and site developer requirement mitigation text.

4 THE REASONS FOR CHOOSING THE IMFLDP2, AS APPROVED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES

4.1 Section 6 of the FER sets out how reasonable alternatives were assessed at both Main Issues Report (MIR) and Proposed Plan (PP) stages. The development site options were reasonable alternatives at MIR stage together with broad alternative policy approaches to the Main Issues. At PP stage the assessment became more focused with the then drafted policies compared against a "do-nothing" alternative which was equated to continuing to apply existing, older, national and Highland planning policies in decision making.

4.2 Perhaps unsurprisingly, the scoring of almost all of the Plan's new general policies were neutral or positive relative to the "do-nothing" alternative. This is because the IMFLDP2 is the first Highland local development plan specifically to address the ecological and climate emergencies by tailoring its general planning policies and development site selection decisions to take account of these issues. For example, the Plan now includes general policies on Low and Zero Carbon Development, Nature Protection, Restoration and Enhancement, Greenspace, Green Networks, Placemaking, and (Sustainable) Transport which are far more aligned to environmental issues than the predecessor plans.

4.3 Similarly, many of the development sites rejected by THC or the Examination Reporters through the various stages of the Plan process were not included wholly or partly for adverse environmental effects reasons.

5 THE MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF IMPLEMENTATION OF THE IMFLDP2.

5.1 Section 9 of the FER sets out THC's intended monitoring measures for the IMFLDP2.

5.2 The now commenced work on the preparation of the Evidence Report for the Highland Local Development Plan will provide a very early opportunity to monitor and review the environmental effects of the IMFLDP2.

5.3 That Evidence Report will assimilate new and better information as it becomes available from the CAs and other sources. For example, SEPA's 2080s (with future climate change allowance embedded) flood risk mapping is already used in planning application decisions and planning policy advice within Highland. THC also intends to update its greenspace and green network mapping for the main settlements within Highland.

5.4 Almost all evidence is now digital and map based and therefore the speed and ease of policy and decision making monitoring is far better than in previous years. Moreover, most if not all of that evidence is in the public domain so its availability and consideration is far more transparent. For example, the new Evidence Report process requires councils to consult on its range of environmental evidence and offers an opportunity for any party to provide or suggest evidence that is "missing" or considered relevant to monitoring and future planning policy formulation.



