

Agenda item	10
Report no	RC/018/18

THE HIGHLAND COUNCIL

Committee: Ross and Cromarty Committee

Date: 2 May 2018

Report Title: **West Highland and Islands Local Development Plan**

Report By: Report by Director of Development and Infrastructure

1. Purpose/Executive Summary

- 1.1 This report presents the outcome of consultation on the proposed West Highland and Islands Local Development Plan and seeks agreement on the Council's finalised position to enable officers to submit the Plan to Scottish Ministers for Examination. **Appendix 1** contains the detail of this information.

2. Recommendations

- 2.1 Members are asked to:
- i. note the issues raised in representations received on the Proposed Plan as they relate to the Ross and Cromarty Committee area and agree the recommended Council response to these issues as set out in **Appendix 1**;
 - ii. authorise officers to undertake the statutory procedures required to progress the Plan to Examination including the submission of the **Appendix 1** to Scottish Ministers; and
 - iii. authorise the Director of Development and Infrastructure, in consultation with the chairs of the local committees, to make non-material changes to **Appendix 1** prior to its submission to the Scottish Government.

3. Background

- 3.1 Members will recall that the West Highland and Islands Proposed Local Development Plan will become the area local development plan for determining planning applications and other development and investment decisions in the West Highland area. The Plan area comprises Wester Ross, Skye and Lochalsh, Lochaber and a small, mountainous part of Badenoch.
- 3.2 The three relevant local committees approved the West Highland and Islands Proposed Local Development Plan as the settled view of the Council at meetings in early 2017. The Plan was then issued for public consultation between May and June 2017.
- 3.3 Over 300 comments have been received from over 100 respondents. Around a third of these relate to Lochaber, a third to Skye and the final third concern Wester Ross, Lochalsh and general issues.
- 3.4 The purpose of this Committee item is now to agree the finalised Council position in order to allow the Plan to be submitted to Scottish Government for Examination along with any remaining unresolved issues raised in representations. The options for this Committee are set out in detail in paragraph 5.1 below.

4. Issues Raised In Comments Received

- 4.1 In August 2017, Committee Members were emailed with a webpage link to view the full version of all comments received. The comments have been available to view since then.
- 4.2 **General issues** (relevant to the Local Committee area)
 - *Vision* - various organisations requested greater recognition in the Plan's *Vision* for their respective interests: Gaelic language, culture and identity; protection of natural heritage; and, renewable energy developments (in particular onshore wind developments). One organisation requested Council support for three new national parks that would overlap a large part of the Plan area.
 - *Settlement Hierarchy* - several respondents queried the Council's hierarchy but not specifically within Wester Ross or Lochalsh.
 - *Housing Requirements* - one respondent queried whether the figures took account of the expected employment led growth in Fort William and the Scottish Government sought clarification of the Plan's housing figures particularly whether the windfall (development on unallocated sites) assumption was an underestimate.
 - *Economic Development Areas* - two respondents commented on the Kishorn Yard Economic Development Area. SNH sought an additional reference to reflect the new Loch Carron Marine Protected Area and an individual sought a restriction on further industrial development at the Yard on sustainability grounds.
 - *Transport* - SSE sought greater recognition of its role in financing improvements and the Scottish Government sought greater Plan references to active travel and electric vehicle charging points.
 - *Environment* - one body sought a general policy to oppose any development on all peatland.

4.3 Ross and Cromarty Settlements

- *Gairloch* – Gairloch in common with the other settlements listed below attracted requests from Mountaineering Scotland, SNH and/or RSPB to better reference landscape and other natural heritage interests. In terms of the site-specifics, objections were lodged in respect of the North Fasaich site on the grounds of inadequate junction visibility and on the Achtercairn West site because of alleged land stability, lack of demand, traffic generation and existing use relocation issues.
- *Kyle of Lochalsh* – in addition to natural heritage comments, one individual objected to the inclusion of a campsite on the Plock or any development that would potentially restrict access to the local population.
- *Lochcarron* – in addition to natural heritage comments, most representations supported or conditionally supported the Plan's existing provisions. One neighbour objection was lodged in respect of the Keilburn Crescent housing site on several grounds but chiefly concerns about drainage and slope stability.
- *Poolewe* – in addition to natural heritage comments, one individual objected to both allocated housing sites because he felt development should be directed to peatland not the better agricultural land.
- *Ullapool* – in addition to natural heritage comments, conditional support representations were made in respect of the Glenfield Hotel and Shore Street Sea Front sites but also three, in principle, objections to the latter site largely because of fears about any marina proposal having an unacceptable visual impact.
- *Other Settlements* – SNH, Mountaineering Scotland and/or RSPB sought augmented natural heritage references in respect of Auchtertyre, Aultbea, Balmacara, Reraig, Dornie, Glenelg, Plockton and Torridon. One individual requested a Plan reference to the need for an authorised campsite within central Glenelg.

5. Recommended Council Position

5.1 Many parts of the Plan are resolved, in that they are not subject to outstanding representations. However, the Council must decide how to proceed with unresolved matters, i.e. issues raised in representations that remain unresolved. There are three options available to the Council:

- (i) pass the Plan to Scottish Ministers as previously approved by committee but to indicate within the **Appendix 1** schedules on which issues and sites the Council will be amenable to the Reporter making changes and to specify what those changes could be;
- (ii) accept that significant changes (such as a deletion of a development site) are needed in light of comments received and re-issue the Plan for another round of public consultation with these “modifications” highlighted;
- (iii) accept that fundamental changes to the Plan's strategy are needed (such as there being a significant under or over provision of housing or employment land) which necessitate the whole or a large part of the Plan being redrafted and re-issue a new Proposed Plan for a round of public consultation.

5.2 **It is recommended that the Council proceed as described in option 5.1(i) above as there is no convincing planning justification to divert from the Council's settled view agreed by Members at committee in early 2017.** For example, many of the objectors to development sites have repeated the same grounds they expressed in response to the Plan's Main Issues Report and these concerns have already been considered by committee.

5.3 Option (ii) would cause a Plan process delay of 6-8 months and option (iii) a delay of 12 months. Both of these options would also incur additional Plan production and publicity costs.

5.4 **Option (i) still allows for a degree of adjustment of the Council's position.** **Appendix 1** contains several sites and issues where officers have endorsed possible Plan amendments for the Reporter's consideration and decision. Members should also be reassured that all comments are passed to the Reporter whether the Council agrees with them or not so everyone's concerns are given independent consideration.

5.5 **General issues**

- *Vision* – **Appendix 1** suggests to the Committee / Reporter a series of minor adjustments to the Plan's Vision but no significant change of direction because the Plan should be as concise as possible and not overly representative of any particular agenda, issue or sectoral interest. The decision on the designation of new national parks rests with Scottish Ministers and there is enough doubt about their effect on the social and economic prosperity of an area to not justify a statement of positive support within the Plan.
- *Settlement Hierarchy* – all councils are required by statute to formulate a spatial strategy for their area and a do-nothing approach would be likely to increase the fragility of the remoter areas of Highland and "overheat" the more popular locations in terms of infrastructure network capacity.
- *Housing Requirements* – the comments received do not justify any significant change in the Plan's overall housing requirements and land supply. There is sufficient allocated land within Fort William to accommodate the expected pace of employment led growth in the short to medium term and the Scottish Government significantly underestimates the contribution that single house developments make to the overall housing land supply within West Highland.
- *Economic Development Areas* – Kishorn Yard is a strategic industrial site which is primed for expansion because of public and private investment. Therefore any block on further industrial operations would be inappropriate. The requested factual reference to the new environmental area is acceptable.
- *Transport* – the additional references sought by SSE and Scottish Government are not appropriate content for an area local development plan.
- *Environment* – an embargo for any development on peatland would rule out several Plan allocations that are the most suitable locations for development in terms of other planning site selection criteria.

5.6 **Ross and Cromarty Settlements**

- *Gairloch* – for Gairloch and the other settlements listed below, additional references to landscape and other natural heritage interests are recommended where directly relevant. The North Fasaich site is proposed for retention because the junction is adequate if not of full standard and the Achtercairn West site is still supported because the objector's issues are already addressed by the allocation's developer requirements. However, the need to protect public seaward views should be made more explicit and therefore an amended developer requirement is recommended in this regard.
- *Kyle of Lochalsh* – the existing Plan text in respect of the Plock site already contains suitable and adequate safeguards for continued recreational access and therefore no changes are recommended.

- *Lochcarron* – only very minor adjustments are recommended except in relation to the Keilburn Crescent housing site. The Committee is invited to consider whether to readjust its position in respect of this site's capacity but not the principle of its development. However, Members should note that a planning application is pending for this site and that the application is likely to be reported to the 5 June 2018 North Planning Applications Committee. Both committee decisions will be furnished to the Reporter to be considered as part of the Plan's Examination.
- *Poolewe* – the grounds of objection to the two village housing sites are insufficient to justify any change. The sites benefit from allocation in the adopted local plan and / or a previous planning permission. Development on peatland is just as if not more hampered by planning constraints than development on agricultural land.
- *Ullapool* – amended developer requirements are recommended to better control any potential negative impacts from the marina / promenade proposal.
- *Other Settlements* – additional references to landscape and other natural heritage interests are recommended where directly relevant. It is recommended to accept the suggested Plan reference to support the principle of an authorised campsite in Glenelg.

6. Next Steps

- 6.1 When all three local committees approve their respective elements of the Plan then it is intended to submit the Plan, the schedules in **Appendix 1** and other related material to the Scottish Government. Soon after, at least one reporter would be appointed to consider the issues raised in representations and the Directorate for Planning and Environmental Appeals then have a target timescale of 6-9 months to complete this Examination process at the end of which the Reporter's Report is published containing binding recommendations on how the Plan should be changed prior to its final adoption by full Council decision. If one or more of the local committees resolve to proceed in the way described in paragraph 5.1(ii) or (iii) then the process will be longer (as described in paragraph 5.2).

7. Implications

- 7.1 **Resource:** Resources to complete statutory processes for the Plan are allowed for within the service budget.
- 7.2 **Legal:** the Plan could be subject to legal challenge but due process has been and will be followed in completing the procedures to adoption and therefore the Council will have a defensible position in the event of any challenge.
- 7.3 **Community (Equality, Poverty and Rural):** An Equalities Impact Assessment (EqIA) screening report has been undertaken and placed on the Council's website and found that a full EqIA is not required. The vast majority of the Plan area is rural and therefore there will be no bias or other implications in respect of this issue. Poverty issues are addressed by the Plan's support for employment, district heating and affordable housing opportunities, and improved accessibility to facilities via free or cheaper travel modes.

- 7.4 Climate Change / Carbon Clever: The Plan has been subject to several rounds of environmental assessment including Habitats Regulations Appraisal (HRA) and Strategic Environmental Assessment (SEA) informed through consultation with Scottish Natural Heritage and other consultation authorities. Suitable mitigation text has been incorporated into the wording of the Plan. This requires developers to undertake further environmental and other assessment work.
- 7.5 Risk: There are no known significant risks associated with the Plan.
- 7.6 Gaelic: the Plan contains headings and a foreword in Gaelic.

Designation: Director of Development and Infrastructure

Date: 19 April 2018

Authors: Scott Dalgarno, Tim Stott, Jennifer Mair - Development Plans

Background Papers:

1. West Highland and Islands Proposed Local Development Plan: May 2017
2. Lochaber Committee Minutes: 18 January 2017
3. Isle of Skye and Raasay Committee Minutes: 27 February 2017
4. Ross and Cromarty Committee Minutes: 12 January 2017
5. Full version of comments via the Council's consultation portal:
<http://consult.highland.gov.uk/portal/westplanpp?pointId=4160778>

The above documents are available via: www.highland.gov.uk

Issue 1	VISION & SPATIAL STRATEGY	
Development plan reference:	Headline Outcomes, Vision & Strategy, Pages 6-9	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Argyll and Bute Council (1104961) Bord na Gaidhlig (1105087) Charles Chisholm (967723) Gwyn Moses (997166) Mountaineering Scotland (964649) RSPB (1104965) Scottish National Parks Strategy Project (930044) Scottish Natural Heritage (909933) SSE Renewables (1104522) Susan Johnston (1104731)</p>		
Provision of the development plan to which the issue relates:	Headline Outcomes, Vision and Spatial Strategy Map, Fort William Hinterland	
Planning authority's summary of the representation(s):		
<p>Headline Outcomes / Vision <u>Argyll and Bute Council (1104961)</u> General, no objection, support for whole Plan.</p> <p><u>Bord na Gaidhlig (1105087)</u> Growing Communities – wants more Plan focus on sustaining rural communities especially in terms of housing availability and employment/economic opportunities because this is where many Gaelic speakers reside. Employment - requests specific reference to Ar Stòras Gàidhlig because it evidences the economic, social and educational value of Gaelic. Connectivity and Transport – wants recognition that the growth in community owned assets has demonstrably increased community capacity with a crossover benefit in terms of the growth of Gaelic language and culture. Environment and Heritage – wants more emphasis on cultural (Gaelic) as well as natural heritage</p> <p><u>Charles Chisholm (967723)</u> Believes that South Ballachulish site BH02 will contribute to the delivery of the Plan's Vision.</p> <p><u>Mountaineering Scotland (964649)</u> Supports priority to “safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities.”</p> <p><u>RSPB (1104965)</u> Environment and Heritage – seeks a Plan wording that will offer a greater degree of protection of natural heritage because this will be clearer and more consistent with Scottish Planning Policy Outcome 3 (below paragraph 19). Also suggests that the first bullet point</p>		

about sustainable travel is more suited to the "Connectivity and Transport" outcome than Environment and Heritage.

Scottish National Parks Strategy Project (930044)

Requests that the Plan should endorse and promote the principle and benefits of designating more National Parks because national parks: are an issue of national importance; help achieve the Environment and Heritage outcomes; would be a great, cost effective success; inspire pride and passion amongst local people and visitors; provide a wide range of environmental, social and economic benefits to local residents, visitors and Scotland as a whole; bring additional resources to places which deserve it; strengthen Scotland's international standing for environmental protection and support our crucial tourism industry; have substantial national and local public support; generate a high profile; support the active management as well as the protection of an area; encourage integrated planning and management by all public bodies; invest additional national resources in helping both residents and visitors to enjoy the landscape whilst conserving it for future generations; and, have substantial political support (four of the five political parties represented in the Scottish Parliament support the designation of more National Parks). Believes 3 areas meet the criteria for national parks: Wester Ross; Ben Nevis/Glen Coe/Black Mount; and, a Coastal and Marine National Park centred on Mull, but possibly also including the Small Isles or Ardnamurchan.

Scottish Natural Heritage (909933)

Seeks stronger Plan wording in the Environment and Heritage section of the Vision to better recognise the value and importance that nature and landscapes have to play in contributing to all of the Proposed Plan objectives and the creation of successful communities.

SSE Renewables (1104522)

Seeks greater Plan recognition of the opportunities for renewable energy developments of all forms on land where appropriate because: SSE is the UK's leading generator of electricity from renewable sources and operates the UK's most diverse portfolio of renewable generation; the Scottish Government recently outlined an ambitious new target for reducing greenhouse gas emissions by 66% by 2032, alongside a fully-decarbonised electricity sector; renewable energy is one of the best tools to combat the urgent environment threat posed by climate change; more weighting should be given within planning to the wider economic and social benefits of development. Seeks greater Plan support for onshore wind development in particular because: it delivers a number of secondary, yet direct benefits to the communities and regions in which they are located, including job creation, skills training opportunities, community volunteering, road and other infrastructure improvements and local supply chain opportunities; SSE is the leading developer and operator of renewable energy in the UK and during the 2015/16 financial year, contributed an estimated £1.6bn to the Scottish economy, supporting around 17,300 jobs in Scotland; SSE has been building and operating renewable energy developments in the Highlands for nearly 70 years and is a proud and longstanding part of the Highland business community; the renewables industry is a significant employer, investor, land user and contributor to the local economy within the Highlands area providing meaningful socio economic opportunity in rural communities; it will safeguard existing and encourage further investment; this will better align with Scottish Planning Policy and National Planning Framework 3 (quotes parts of NPF3 and SPP that are supportive of renewables developments); and SSE has supported over 5,000 community projects through community benefit funds, to the value of almost £20million and is currently exploring community

ownership options and this will support the Plan's objective of building community empowerment.

Vision & Spatial Strategy Map

Charles Chisholm (967723)

Supports the inclusion of South Ballachulish as a Main Settlement on the Map and considers that site BH02 will help to reinforce this status.

SSE Renewables (1104522)

Seeks greater clarity regarding how much weight will be attached to 'community or neighbourhood plans'. Believes the Plan should be explicit in this respect so as to avoid any ambiguity. Also seeks confirmation that the areas defined as 'fragile' in the Proposed Plan are only labelled as such because of their 'relatively poor accessibility to services, facilities and employment opportunities' again to avoid any ambiguity.

Fort William Hinterland

Gwyn Moses (997166)

Seeks reasoning for western extent of Fort William Hinterland boundary. Concerned that the boundary does not follow a precise geographic feature.

SSE Renewables (1104522)

Requests a positive policy in respect of onshore wind proposals because: Scotland has some of the best conditions in Europe and substantial average wind speeds; onshore wind continues to be the cheapest, low carbon form of generation that can be built; it can be deployed quickly, and it has the potential to support an indigenous supply chain along with wider socio-economic benefits; and it would be in the best interest of customers, and for Scottish Government economic ambitions, for onshore wind development, including repowering and life extensions, to be supported in order to meet decarbonisation targets and deliver economic benefits on a local, regional and national level.

Susan Johnston (1104731)

Believes all communities should be allowed to grow organically rather than a Council trying to direct growth to particular settlements. Believes that planned communities don't work.

Modifications sought by those submitting representations:

Headline Outcomes / Vision

Argyll and Bute Council (1104961)

None.

Bord na Gaidhlig (1105087)

Additional Plan references to Gaelic language and heritage and a general duty on the Council and developers to have regard to Gaelic in planning matters including how development proposals can support Gaelic language and heritage. Specifically, wants: more Plan focus on sustaining rural communities especially in terms of housing availability and employment/economic opportunities; reference to document Ar Stòras Gàidhlig; and, Plan recognition that the growth in community owned assets has demonstrably increased community capacity with a crossover benefit in terms of the growth of Gaelic language and culture.

Charles Chisholm (967723)

None.

Mountaineering Scotland (964649)

Additional and specific Plan outcome to “safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities” (assumed).

RSPB (1104965)

That in the second “Environment and Heritage” outcome, “respectful of heritage resources” is replaced by “protects and enhances natural and cultural assets”.

That the first bullet point about sustainable travel be moved from the “Environment and Heritage” outcome to the “Connectivity and Transport” outcome.

Scottish National Parks Strategy Project (930044)

Additional Plan content to endorse and promote the principle and benefits of designating more National Parks in general and specifically for Wester Ross; Ben Nevis/Glen Coe/Black Mount; and, a Coastal and Marine National Park centred on Mull, but possibly also including the Small Isles or Ardnamurchan.

Scottish Natural Heritage (909933)

That the following wording to be inserted into the Environment and Heritage section of the Vision (Table 1 in the proposed Plan):

“High quality places where the outstanding environment and natural, built and cultural heritage is celebrated and valued assets are safeguarded.”

SSE Renewables (1104522)

Additional and stronger Plan references to the opportunities for all forms of renewable energy developments across the Plan area and greater Plan support for onshore wind development in particular (assumed).

Vision & Spatial Strategy Map

Charles Chisholm (967723)

None.

SSE Renewables (1104522)

Explicit clarification of what decision making weight the Council will attach to any community plan. Confirmation that the areas defined as ‘fragile’ are only labelled as such because of their ‘relatively poor accessibility to services, facilities and employment opportunities’.

Fort William Hinterland

Gwyn Moses (997166)

Additional Plan text to clarify why the Fort William Hinterland boundary doesn’t follow clear physical feature boundaries (assumed).

SSE Renewables (1104522)

Requests a positive policy in respect of onshore wind proposals within the Hinterland (assumed).

Susan Johnston (1104731)

A revised spatial strategy with no settlement hierarchy (assumed).

Summary of responses (including reasons) by planning authority:

Headline Outcomes / Vision

Argyll and Bute Council (1104961)

Support noted.

Bord na Gaidhlig (1105087)

The Highland Council has an established track record of developing and implementing policies to promote Gaelic language and culture but chooses to do this corporately (via publication and implementation of a Gaelic Language Plan) rather than via its development plan. As the respondent points out, Gaelic should be promoted across all aspects of Highland life. It is therefore more sensible to achieve this aim via a document with a wider remit than just land use planning. The Gaelic Language Plan does contain Council commitments with implications for planning policy and practice. For example, it includes a commitment to increase the visibility of Gaelic in retail, commercial development and small business signage at the formal planning stage. The Council's development plan for the wider Highland area (the Highland wide Local Development Plan) would be a better location for any general planning policy on this issue. It is scheduled to continue its review during 2018/19 and the respondent could raise the matter again at that stage. Another possible avenue would be to suggest that the Council's Supplementary Guidance on Public Art be reviewed to incorporate a developer requirement that public art provision could include art that contributes or is relevant to Gaelic language and culture. The Plan's Outcomes and Spatial Strategy are written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore a fundamental re-write in favour of Gaelic interests would not be appropriate. However, if the Committee / Reporter is minded to agree then one addition would provide a greater but not disproportionate reference to Gaelic interests. A reference to the document *Ar Stòras Gàidhlig* could be made in the 5th bullet point of paragraph 1.41 which highlights the economic potential of Gaelic culture and heritage.

Charles Chisholm (967723)

Support noted.

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan including the Outcomes. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. The Plan's Outcomes and Spatial Strategy are written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore the suggested addition would not be appropriate. The Council's wider approach to landscape issues is explained in section 1.4 of the Plan and the Council believes this offers adequate coverage of these issues.

RSPB (1104965)

The Plan's Outcomes and Spatial Strategy are written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore the suggested wording would not be appropriate. However, the additional text suggested by Scottish Natural Heritage below is more measured and with a minor amendment will not be prejudicial to other interests. If the Committee / Reporter is minded to agree then the following text could be added as a fourth bullet point within the Environment and Heritage Headline Outcome, "High quality places predominate where the outstanding environment and natural, built and cultural heritage is celebrated and valued assets are safeguarded." Promoting more sustainable travel will help achieve both of the "Environment and Heritage" and "Connectivity and Transport" outcomes. On balance, the Council believes it will do marginally more for climate change than for connectivity. For example, modal shift to active travel will reduce emissions but will not necessarily be faster for the user.

Scottish National Parks Strategy Project (930044)

The decision whether to propose designation of a part of the Highland Council area as an additional National Park rests with Scottish Ministers under the National Parks (Scotland) Act 2000. Therefore any Plan support for additional National Parks would be a lobbying statement or recommendation to government rather than a policy. The Council believes that the two existing National Parks have afforded a greater degree of environmental protection and tourism promotion than would have otherwise occurred without the designations and corresponding authorities. However, it also appears that within the Highland Council area that the Cairngorms National Park has reduced or displaced population, household and economic growth. For example, some housing demand has been deflected from Badenoch and Strathspey to Inverness. Designation of the three suggested areas would be likely to achieve these same outcomes. Although there would be some sustainability and cost effective public service provision benefits of redirecting population and housing growth to the largest west coast settlements and to the Inner Moray Firth, the Council also recognises that the designations would be likely to reduce the normally resident population of some of the most remote and economically and socially fragile parts of the Plan area. More arguably, National Park designations also tend to increase house prices at a higher rate than would otherwise occur. Wester Ross already suffers from affordability issues in terms of average house prices compared to average local incomes. In short, the Council believes that the benefits of further designations do not demonstrably and sufficiently outweigh their likely adverse effects. Therefore the Council does not believe that the Plan should contain a positive, lobbying statement on this issue.

Scottish Natural Heritage (909933)

The Plan's Outcomes and Spatial Strategy are written to be concise and not overly representative of any particular agenda, issue or sectoral interest. However, the text suggested by Scottish Natural Heritage is measured and with a minor amendment will not be prejudicial to other interests. If the Committee / Reporter is minded to agree then the following text could be added as a fourth bullet point within the Environment and Heritage Headline Outcome, "High quality places predominate where the outstanding environment and natural, built and cultural heritage is celebrated and valued assets are safeguarded."

SSE Renewables (1104522)

The Highland Council recognises the importance of renewable energy developments to Highland and has a comprehensive suite of policy guidance on this issue. The Council's Highland wide Local Development Plan and related Supplementary Guidance provide adequate policy coverage. Any amendment to the policy presumption for or against

renewable energy development would most appropriately be addressed across Highland as a whole, through the review of the Highland wide Local Development Plan. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Vision & Spatial Strategy Map

Charles Chisholm (967723)

Support noted.

SSE Renewables (1104522)

Paragraphs 1.18 and 1.19 of the Plan explain the Highland Council's intentions in respect of the status of community plans within the Plan area. Ultimately, they are intended as statutory Supplementary Guidance to the West Highland and Islands Local Development Plan. However, to achieve this status the community must ensure that its plan addresses the issues and Placemaking Priorities outlined in the Council's Plan. Moreover the community must evidence to the Council that it is carried out inclusive and effective public consultation on its draft plan and responded appropriately to comments made before asking the Council to adopt the plan as interim Supplementary Guidance. This adoption as Council approved guidance is made by the appropriate area committee of the Highland Council. Following adoption of the West Highland and Islands Local Development Plan all related community plans will be collated and submitted to Scottish Ministers for clearance for final adoption as statutory Supplementary Guidance. The Highland Council assists with / undertakes the environmental assessment / appraisal processes associated with the production and adoption of the guidance. As the new Planning Bill and its secondary legislation progresses through parliament then new procedures will come into effect. Paragraph 1.9 states that the areas defined as 'fragile' are labelled as such because of their 'relatively poor accessibility to services, facilities and employment opportunities'. For the avoidance of doubt, these areas are not based on environmental sensitivity / fragility. They are based on data including population loss, drive time to higher order facilities, median household income and unemployment rate. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Fort William Hinterland

Gwyn Moses (997166)

The Fort William Hinterland like others within the Highland Council area was first formulated in the 1990s and embodied within the Highland Structure Plan in 2001. The intention of the policy that accompanies the boundary and area is to control the adverse service network, water environment and landscape capacity effects of unrestricted housing demand close to Highland's major work centres. Similar to green belt policy, some control of commuter led housing demand is promoted within the Hinterland open countryside. The original (2001) hinterland areas were very simple, fixed distance radii shapes measured from the centre of each work centre. Since that time each Hinterland shape has evolved and been fine tuned through each subsequent local plan or local development plan review. That fine tuning has included some clipping of the boundary to specific geographic features but only where requested. More fundamental amendments were made to better reflect drive times to the work centre. The respondent's particular concern relates to the Hinterland edge near Kinlocheil. Council document [*] demonstrates that this particular edge of the Hinterland does follow the fence line of the property Kinloch House. If the Committee / Reporter is minded to agree then a further fine tuning of the boundary at this location may be appropriate. The Reporter may wish to ask the respondent to provide further, mapped

information on the changes requested.

SSE Renewables (1104522)

The Council offers the same answer (above) to the respondent's representation on the Plan's Headline Outcomes / Vision section. The Council's Hinterland policy relates solely to housing development. If it has any relevance then one purpose of the Hinterland is to ration the limited landscape capacity of the open countryside around major work centres to favour development with a land management or similar justification. On shore wind energy development in general has no locational imperative to be within the Hinterland. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Susan Johnston (1104731)

National legislation and planning policy requires local planning authorities to produce local development plans that "direct the right development to the right place." A plan must contain a spatial strategy and individual planning decisions should be plan-led. Therefore a council cannot produce a "do-nothing" plan of allowing every community to grow organically without any attempt at direction of development. Moreover, the absence of any direction would lead to some popular areas becoming over developed and other areas undeveloped. Public and private investment in infrastructure and community facility networks would be less efficient. New towns and communities have a long tradition in Scotland and the wider world and once established and mature they can offer high quality places to live and work. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Reporter's conclusions:

Reporter's recommendations:

Issue 2	SETTLEMENT HIERARCHY & HOUSING REQUIREMENTS	
Development plan reference:	Growing Communities section, Pages 10-18	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ballachulish Community Council (969774) Charles Chisholm (967723) Duror and Kentallen Community Council (1105221) Glencoe & Glen Etive Community Council (997398) Gwyn Moses (997166) Kinlochleven Community Council (1105214) Nether Lochaber Community Council (968651) Scottish Government (1101467) RSPB (1104965) SSE Renewables (1104522) Susan Johnston (1104731) Waternish Community Council (1103457)</p>		
Provision of the development plan to which the issue relates:	Growing Communities Sub Outcome, Settlement Hierarchy, Housing Requirements, Policy 1 Town Centre First, Policy 2 Delivering Development, Policy 3 Growing Settlements	
Planning authority's summary of the representation(s):		
<p>Proposed Settlement Hierarchy <u>Ballachulish Community Council (969774), Duror and Kentallen Community Council (1105221), Glencoe & Glen Etive Community Council (997398), Kinlochleven Community Council (1105214), Nether Lochaber Community Council (968651)</u></p> <p>Record concerns about sewerage provision and capacity in the Loch Leven communities. In particular, believe North Ballachulish waste water treatment plant is either at full capacity, very close to it, or slightly over capacity. Dispute Scottish Water's figure for the extant capacity of the plant because: it does take account of tourism development committed by planning permission; sewage is tankered out for treatment elsewhere and therefore the figure is misleading as well as adding unnecessary HGV movements to the local and trunk road networks; and, it differs from the figure of 50 housing units quoted by Highland Council. Believe that because of this sewerage capacity constraint that the Plan should be explicit in supporting future development of a scale of 5 houses or more only if that development incorporates modern, on-site wastewater treatment facilities such as UV processing, or a 'Microbac Reactor', and greywater management as integral parts of the planning application and development construction. Believe that the North Ballachulish waste water treatment plant should not be expanded because it would: have an adverse impact on the National Scenic Area; not be cost effective; and, not be feasible given its proximity to the coastline, the A82, a scheduled ancient monument and privately owned grazing land. Believe that any spare capacity at North Ballachulish should be reserved for the Inchree area where current and committed development is serviced via private septic</p>		

tank / soakaway arrangements. This development should be connected to North Ballachulish via a new public sewer.

Charles Chisholm (967723)

Supports inclusion of South Ballachulish as a Main Settlement within the Proposed Settlement Hierarchy and considers that site BH02 will help to reinforce this status.

SSE Renewables (1104522)

Request Plan clarification as to status of community plans.

Waternish Community Council (1103457)

Requests that Waternish is added to the list of potential community plan settlements because: some preparatory work already undertaken by community; the plan will reflect community wide comments, observations and concerns and can make Waternish an even better place to live and work; sound research and robust engagement has already been undertaken; and, of the desire for the community to produce a document that will be a material consideration in any development decisions. Suggests that the priorities and issues are: Infrastructure - roads, broadband; Tourism - positive and negative aspects; Affordable Housing - local and your people; and, Local Businesses and Crofting - need to support and encourage small scale business growth and the continuation of crofting.

Housing Land Requirements

Charles Chisholm (967723)

States that site BH02 can make a meaningful contribution to meeting the Plan's housing land requirement for Lochaber.

Gwyn Moses (997166)

Seeks clarification whether the housing numbers within the table include housing for people in Lochaber if plans for expansion of the smelter occur as planned and if so asks where the houses for potentially 900 workers and others are likely to be located.

Susan Johnston (1104731)

Believes that the Plan should not support any further development on croft land (other than that already committed through decrofting applications and/or planning permissions) because: crofting is essential to the identity and prosperity of communities; that development will make the crofting way of life unsustainable; and, the crofting landscape and its contribution to cultural identity is important for tourism (assumed).

Scottish Government (1101467)

Seeks further clarification of the methodology used to produce the published housing land requirements because: a full explanation is required by Scottish Planning Policy and the requirements set out in the Plan are potentially contradictory with those set out in the approved Highland wide Local Development Plan and Housing Need and Demand Assessment. Queries whether and how the Plan can maintain a 5-year land supply if the high rate of assumed windfall development doesn't materialise. Suggests that an annual windfall monitoring commitment should be made and mitigation put in place to comply with Scottish Planning Policy. Seeks a table that demonstrates that the sites allocated for housing add up to the 2,292 figure set out in paragraph 1.24 of the Plan to ensure compliance with Scottish Planning Policy. Seeks a statement on how the Plan will deliver on affordable housing targets as this is required by other Highland and national planning

policy.

SSE Renewables (1104522)

Seeks a more positive Plan approach to the delivery of affordable housing especially for young people because this can affect major employer's ability to attract and retain local young people in employment in remote regions.

Policy 2: Delivering Development

Charles Chisholm (967723)

Believes that site BH02 is deliverable provided that specific developer requirement changes are made (detailed within the North Ballachulish, Glenachulish and South Ballachulish Schedule 4)

Policy 3: Growing Settlements

RSPB (1104965)

Requests that in the last criterion of Policy 3, "locally important heritage feature" is replaced by "locally important natural or cultural heritage feature" to make it clearer that natural and cultural assets are covered by this criterion.

Modifications sought by those submitting representations:

Proposed Settlement Hierarchy

Ballachulish Community Council (969774), Duror and Kentallen Community Council (1105221), Glencoe & Glen Etive Community Council (997398), Kinlochleven Community Council (1105214), Nether Lochaber Community Council (968651)

That the Plan, within the combined, listed community council areas, should be explicit in supporting future development of a scale of 5 houses or more only if that development incorporates modern, on-site wastewater treatment facilities such as UV processing, or a 'Microbac Reactor', and greywater management as integral parts of the planning application and development construction. A Plan statement to presume against any expansion of the North Ballachulish waste water treatment plant with any spare capacity reserved for the Inchree area where current and committed development are serviced via private septic tank / soakaway arrangements and a commitment to lobby Scottish Water to connect this area to the North Ballachulish plant via a new public sewer (assumed).

Charles Chisholm (967723)

None.

SSE Renewables (1104522)

Clarification as to the decision making status the Council will afford to community plans.

Waternish Community Council (1103457)

Waternish added to the Plan as a potential community plan settlement with the supplied list of issues and priorities.

Housing Land Requirements

Charles Chisholm (967723)

None.

Gwyn Moses (997166)

Plan clarification whether or not the housing numbers within Table 3 include the additional 900 unit demand related to the smelter expansion and where this demand will be accommodated.

Susan Johnston (1104731)

A Plan policy that presumes against any further development on croft land (other than that already committed through decrofting applications and/or planning permissions) (assumed).

Scottish Government (1101467)

Requests: additional clarification of the methodology used to produce the housing land requirements; an annual windfall monitoring commitment and mitigation to resolve under supply if necessary; a table that demonstrates that the sites allocated for housing add up to the 2,292 figure set out in paragraph 1.24 of the Plan; and, a statement on how the Plan will deliver on affordable housing targets.

SSE Renewables (1104522)

Additional policies and proposals seeking to improve access to affordable housing for people in the Highlands, especially young people.

Policy 2: Delivering Development

Charles Chisholm (967723)

None, provided that site-specific developer requirement changes are made (detailed within the North Ballachulish, Glenachulish and South Ballachulish Schedule 4)

Policy 3: Growing Settlements

RSPB (1104965)

Replacement of the last criterion of Policy 3, "locally important heritage feature" by "locally important natural or cultural heritage feature".

Summary of responses (including reasons) by planning authority:

Proposed Settlement Hierarchy

Ballachulish Community Council (969774), Duror and Kentallen Community

Council (1105221), Glencoe & Glen Etive Community Council (997398),

Kinlochleven Community Council (1105214), Nether Lochaber Community Council (968651)

The Council accepts (referenced in paragraph 2.20) that the Loch Leven communities have limited public sewerage capacity and this acts as a constraint on the scale of future development that the Plan can support. Therefore, the Plan allocates very few housing sites within the "sewered area" catchment of the North Ballachulish waste water treatment plant. The Council also agrees that development not connected to the public sewer should have adequate private treatment facilities in place in order to protect the wider water environment. Policy 65 of the Highland wide Local Development Plan, Waste Water Treatment provides adequate Highland planning policy coverage of this issue. The Plan does not allocate land for the expansion of the North Ballachulish plant and therefore offers no positive support for such an expansion. However, public sewerage capital programme investment decisions are made by Scottish Water and not by the Council. Similarly, the judgment on the technical acceptability or otherwise of a larger scale, private drainage arrangement in terms of the quality of its water discharge is a matter for the Scottish

Environment Protection Agency. This judgment about the level of treatment required varies with the specifics of the development and site conditions. Moreover, this level of treatment can be achieved via a variety of waste management systems and therefore SEPA does not prescribe a generic system for all sites. Scottish Water have confirmed [*] that the North Ballachulish works includes 2 waste water treatment plants with a combined spare capacity of 535 housing units. The plant serving North Ballachulish and Onich has a spare capacity of 270 housing units and the plant serving Glenachulish, South Ballachulish and Glencoe has a spare capacity of 265 housing units. Therefore there is no sewerage plant capacity constraint relative to the capacity of the Plan's allocations. Accordingly, the Council believes that the existing Plan's content should remain unaltered in respect of this issue.

Charles Chisholm (967723)

Comment noted.

SSE Renewables (1104522)

Paragraphs 1.18 and 1.19 of the Plan explain the Highland Council's intentions in respect of the status of community plans within the Plan area. Ultimately, they are intended as statutory Supplementary Guidance to the West Highland and Islands Local Development Plan. However, to achieve this status the community must ensure that its plan addresses the issues and placemaking priorities outlined in the Council's Plan. Moreover the community must evidence to the Council that it is carried out inclusive and effective public consultation on its draft plan and responded appropriately to comments made before asking the Council to adopt the plan as interim Supplementary Guidance. This adoption as Council approved guidance is made by the appropriate area committee of the Highland Council. Following adoption of the West Highland and Islands Local Development Plan all related community plans will be collated and submitted to Scottish Ministers for clearance for final adoption as statutory Supplementary Guidance. The Highland Council assists with / undertakes the environmental assessment / appraisal processes associated with the production and adoption of the guidance. As the new Planning Bill and its secondary legislation progresses through parliament then new procedures will come into effect. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Waternish Community Council (1103457)

Paragraph 1.18 of the Plan explains that the Council will support communities in preparing their own plans where they have positive land use change ideas. The Council has politely declined requests from communities who have worthwhile community development ideas but ones that don't have direct land use implications – e.g. training programmes for young local unemployed people. Similarly, communities wishing to promote a more restrictive approach to development than the Council's general policies within the approved Highland wide Local Development Plan would allow have not been offered any encouragement. Unfortunately, Waternish Community Council's request and justification for a community plan is very nebulous. It is unclear whether the community have positive land use ideas with potential sites and funding opportunities in mind or whether it simply wishes to place on record a list of issues affecting its area. Accordingly, the Council does not believe that the representation currently provides sufficient justification to include within the Plan a set of priorities and issues for Waternish. However, the new Planning Bill passing through Parliament is likely to offer greater opportunity for community plans (local place plans) without the need for formal endorsement within the Council's local development plan and therefore the respondent may still achieve its aim. In the interim, it will have time to better

research, formulate and consult upon its proposals. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Housing Land Requirements

Charles Chisholm (967723)

Comment noted.

Gwyn Moses (997166)

The Proposed Plan's housing land requirements are based upon nationally estimated population and household figures for the Highland area and don't take account of changes likely to result from the smelter site's expansion. These figures are largely based on an extrapolation of past trends in birth rates, death rates and household sizes. The Highland Council has some flexibility in deciding upon the housing land requirement that results from these figures but the overall methodology is checked by Scottish Government. Accordingly, we cannot manipulate the population and household forecasts to take account of the likely smelter expansion, which would result in additional jobs, people and houses. If and when the smelter site's expansion happens it will be reflected in actual population numbers and will be part of the "past" trend and influence the future forecast. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Susan Johnston (1104731)

The respondent's requested change to the Plan is unclear but is founded upon a desire to better protect croft land from housing development proposals. The Council's Highland wide Local Development Plan contains a general policy on this issue. Policy 47 Safeguarding Inbye / Apportioned Croftland sets out the Council's approach of minimising the loss of the more agriculturally productive croft land across all of Highland. The Council, in its choice of allocations in the Plan has also sought to identify land not in crofting tenure or croft land of poorer agricultural quality wherever possible. However, the planning system in general and the Plan's allocation site selection process in particular, has to weigh up development considerations other than land capability for agriculture. Accordingly, the Council does not agree that a new policy is needed to place an additional or more restrictive presumption against housing development on croft land.

Scottish Government (1101467)

Paragraphs 1.20 to 1.24 and Table 3 provide a simplified but adequate account of how the Plan's housing supply targets and housing land requirements have been determined. This topic has limited interest to most Plan users and the Highland Council's longstanding policy commitment to identify a generous housing land supply across all of Highland has meant that the development industry has rarely challenged the Council's approach. A more pertinent issue to debate is the deliverability of the figures. The Plan area is affected by more deliverability constraints than would be typical within many other, particularly urban, parts of Scotland. Issues such as crofting tenure, larger estate management practices, higher than average site preparation and construction costs, poorer infrastructure network capacity, and greater environmental constraints, all create challenges to activating housing sites. For the Scottish Government's clarification, the totals in Table 3 are derived from the "Continued Growth" scenario column of Table 4-5 of the 2015 Housing Need and Demand Assessment (HoNDA) and adjusted in 3 ways. First, because the Plan area only encloses 74% of the West Ross Housing Market Area only 74% of the "Continued Growth" figure for West Ross is applied. Second, a future ineffective housing stock allowance is added. This percentage allowance is based on the recently estimated proportion of ineffective stock as

set out in Table 3-2 of the HoNDA. Finally, an additional 20% allowance is included to allow for market choice of sites and to take account of the deliverability issues listed above. These three adjustments take the Plan area total from 3,059 in the HoNDA to 4,354 units as the Plan's 20 year housing land requirement. Table 3 of the Plan is compatible with Table 1 (Housing Supply Targets) of the Highland wide Local Development Plan Main Issues Report September 2015, which updates the approved Highland wide Local Development Plan 2012. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Paragraph 1.23, makes clear that the Council proposes to assume that 50% of future house completions will be on sites not specifically allocated for that purpose in the Plan. This 50% figure is far more likely to be an under-estimate not an over-estimate of this Council definition of windfall development. The Council has analysed the location of the 3,720 house completions over the years 2000 to 2017 inclusive within the West Highland and Islands Plan area, relative to the boundaries of sites allocated for development in the previous development plans and found that 3,150 of those completions were outwith those allocations. This equates to an 84.7% windfall level. As paragraph 1.23 explains, this trend is likely to continue because demand for single, private, rural plots drives the housing market within the Plan area. The Council's policy intent is to guide a higher proportion of future development within the larger settlements and to the larger allocations within those settlements. However, as already stated, the deliverability of the larger allocations depends upon a range of issues which often includes the need for significant up-front infrastructure investment. This investment often requires a public subsidy which is not always forthcoming. Moreover the Plan contains fewer allocations than the plans it will supersede so again, if anything, the future windfall percentage level will be higher not lower than previous. The Council monitors and publishes house completion information as a matter of course and this will highlight the need for any review. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Similarly, Paragraph 1.24 and Table 3 make clear that the total housing capacity of the Plan allocations is 2,292 and 50% of the 20 year housing land requirement is 2,177. A schedule of all sites and their individual capacities will not add value to the Plan and lengthen what is already a substantial document. The Council collates and publishes very similar information via its Housing Land Audit [*]. If the Reporter requires clarification then a further information request could be issued through the Plan's Examination process.

Predicting a precise number of affordable houses that will be delivered over the next 20 years within the Plan area is impractical. That number will vary as the level of central government funding for such provision varies. Therefore the Council simply states that it will achieve its 25% target. We believe this is reasonable because of the virtual absence of private, volume housebuilder interest in the Plan area. Most if not all of the larger allocations in the Plan will be affordable housing developer led. Moreover the Council has recently announced its intention to lower the threshold from 4 units to 1 unit for its developer contributions policy in respect of affordable housing. Once implemented, this will capture affordable provision from the smaller scale developments. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

SSE Renewables (1104522)

The Council agrees with the sentiment expressed by the respondent and is doing all it can to deliver affordable housing development within Highland. The allocations policies of

registered social landlords are a matter for individual providers, the Scottish Government and ultimately the courts but not for the local planning authority. A policy of favouring younger people in preference to those from other age groups of equivalent or greater housing need is likely to be impracticable. The Council believes that the best way forward is to allocate a plentiful and diverse range of size, location and ownership of sites that accommodate all sizes, types and tenures of housing units. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Policy 2: Delivering Development

Charles Chisholm (967723)

The respondent's commitment to implement an allocated site is welcomed. The North Ballachulish, Glenachulish and South Ballachulish Issue Schedule provides the Council's response in respect of the detail of the particular site's developer requirements.

Policy 3: Growing Settlements

RSPB (1104965)

The wording of this criterion of Policy 3 is very similar across the Council's three area local development plans. As such, any change would create inconsistency or the need to update other local development plans across Highland. The Council believes that most Plan readers will infer that the word "heritage" covers natural, built and cultural heritage. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue and should remain unaltered.

Reporter's conclusions:

Reporter's recommendations:

Issue 3	ECONOMIC DEVELOPMENT AREAS	
Development plan reference:	Employment section, Pages 19-24	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Aileen Grant (995776) Fearann Eilean Iarmain (995590) Jane Mackay Lynch (1096377) Kilmallie Community Council (1104950) Scottish Natural Heritage (909933) SEPA (906306) SSE Renewables (1104522)</p>		
Provision of the development plan to which the issue relates:	Employment Sub Outcome, Economic Development Areas at Ashaig Airstrip (EDA01), Glencoe Ski Centre Base Station (EDA02), Inverloch Castle Estate (EDA03), Kishorn Yard (EDA04) and Nevis Forest and Mountain Resort (EDA05)	
Planning authority's summary of the representation(s):		
<p>Ashaig Airstrip <u>Fearann Eilean Iarmain (995590)</u> Believes the potential expansion of business and tourism uses at the airstrip would be beneficial for Skye and the adjacent mainland. With momentum building recently for reopening scheduled air services, it is important that land is allocated for supporting services and developments.</p> <p><u>Jane Mackay Lynch (1096377)</u> Disputes inclusion of respondent's property within allocation boundary. The property is a domestic house and garden and the respondent has no intention to pursue a business proposal.</p> <p><u>SEPA (906306)</u> Seeks specified amendment to better address flood risk because: the site is adjacent to the sea and has a river and other watercourses running through it and therefore parts of the site are at risk of flooding; Scottish Planning Policy and the Flood Risk Management Act require that people and property are protected from flood risk; that the mitigation measures identified in the Plan's Environmental Report are implemented; and, to ensure consistency with other similar developer requirements within the Plan.</p> <p>Seeks specified amendment to better address carbon rich soils and wetlands because: the Environmental Report identifies that most of the site is located on carbon rich soils and wetlands and SEPA's data confirms this; impacts on carbon rich soils should be minimised in line with paragraph 205 of Scottish Planning Policy; impacts on wetlands should be minimised in line with the Water Framework Directive; and to ensure consistency with other similar developer requirements within the Plan.</p>		

SSE Renewables (1104522)

Comments that the respondent is working with Transport Scotland and The Highland Council to upgrade the junction at the Ashaig Airstrip, Broadford, Skye as part of the Bhlaraidh Wind Farm project and that this is a good example of how SSE has worked with the Highland Council to help achieve strategic low carbon ambitions while furthering economic investment in the region.

Glencoe Ski Centre Base Station

SEPA (906306)

Seeks specified amendment to better address flood risk because: the site has watercourses running through it and therefore parts of the site are at risk of flooding; Scottish Planning Policy and the Flood Risk Management Act require that people and property are protected from flood risk; and, to ensure consistency with other similar developer requirements within the Plan.

Inverloch Castle Estate

Kilmallie Community Council (1104950)

Seeks reduction in allocation where its boundary lies close to the River Lochy because a greater development set back from the river would retain and enhance its green corridor function.

Kishorn Yard

Aileen Grant (995776)

Objects to Plan's promotion of further industrial development at Kishorn on the grounds of sustainability because: Kishorn is isolated and remote; the development already generates more heavy goods vehicle trips by road than by sea; there is insufficient local road capacity and no certainty about future improvements such as Lochcarron Bypass; tourism employment will be affected and this is more important to the local economy; the site has other potential including tourism-related development; the new biosphere designation is a material change which requires the future of Kishorn Yard to be reassessed; industrial development will reduce the quality of life and environmental assets in the area.

Scottish Natural Heritage (909933)

Seek Plan update to reflect a new natural heritage designation. The Loch Carron Marine Protected Area (MPA) could be affected by the allocation because marine based activities and operations arising from development that either create pollution, disturb the sea bed or alter the flow of water and so sediment deposition have the potential to affect the species and habitats of the MPA.

Nevis Forest and Mountain Resort

Scottish Natural Heritage (909933)

Seeks specified amendment to better reference natural heritage constraints. These interests should be listed in the developer requirements to ensure adequate protection should the masterplan not be adopted as statutory Supplementary Guidance and/or alternative proposals come forward.

SEPA (906306)

Seeks specified amendment to better address carbon rich soils and wetlands because: the

Environmental Report identifies that most of the site is located on carbon rich soils and wetlands and SEPA's data confirms this; impacts on carbon rich soils should be minimised in line with paragraph 205 of Scottish Planning Policy; impacts on wetlands should be minimised in line with the Water Framework Directive; and to ensure consistency with other similar developer requirements within the Plan.

Modifications sought by those submitting representations:

Ashaig Airstrip

Fearann Eilean Iarmain (995590)

None.

Jane Mackay Lynch (1096377)

Exclusion from site of land owned by the respondent at Lusa/Rubha Lusa at east end of airstrip.

SEPA (906306)

Developer requirements amendments to read: "In particular, assessment and potentially mitigation will be required of: flood risk (Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures)." Also: "Peat management plan to demonstrate how impacts on peat have been minimised and vegetation survey to demonstrate how impacts on wetlands have been avoided. Presence of deep peat and wetlands may limit area that can be developed."

SSE Renewables (1104522)

Recognition that SSE has worked with the Highland Council to help achieve strategic low carbon ambitions while furthering economic investment in the region for example to upgrade the junction at the Ashaig Airstrip, Broadford, Skye as part of the Bhlairidh Wind Farm project (assumed).

Glencoe Ski Centre Base Station

SEPA (906306)

Developer requirements amendments to read: "Flood Risk Assessment (no development in areas shown to be at risk of flooding)". Also: "Retain and integrate watercourse as natural features with the development; no culverting."

Inverloch Castle Estate

Kilmallie Community Council (1104950)

Reduced allocation boundary where it passes close to the River Lochy and wider green corridor notation adjacent to river.

Kishorn Yard

Aileen Grant (995776)

Deletion of industrial use option from site and change to support lower impact uses such as tourism. As a fall back position if support for industrial uses is maintained then a new developer requirement to make further industrial development of the site conditional upon existing transport links being fully upgraded including the Lochcarron Bypass and a link road to the site (all assumed).

Scottish Natural Heritage (909933)

Developer requirements addition. Insert at end: “development proposals must demonstrate that the impacts of marine based activities and operations arising from development will not adversely affect the integrity of the Loch Carron Marine Protected Area (MPA)”

Nevis Forest and Mountain Resort

Scottish Natural Heritage (909933)

Developer requirements addition. Insert “avoid adverse impacts on the Parallel Roads of Lochaber Site of Special Scientific Interest (SSSI) and the Glen Roy & the Parallel Roads of Lochaber Geological Conservation Review (GCR) site”

SEPA (906306)

Developer requirements amendments to read: “Peat management plan to demonstrate how impacts on peat have been minimised and vegetation survey to demonstrate how impacts on wetlands have been avoided. Presence of deep peat and wetlands may limit area that can be developed.”

Summary of responses (including reasons) by planning authority:

Ashaig Airstrip

Fearann Eilean Iarmain (995590)

The Plan’s existing provisions are supportive of the respondent’s wishes for the site. Accordingly, the Council believes that the existing Plan content is sufficient in respect of this issue.

Jane Mackay Lynch (1096377)

The allocation’s extent is identical to that “rolled-forward” from the approved development plan (the West Highland and Islands Local Plan [as continued in force] 2012). The inclusion of the domestic property is necessary because in the event of the runway being extended to the east then the property may be affected by the runway’s operational use and associated safety margins. As the Plan text makes clear, any such extension would be subject to several assessments and a planning application. Currently, it is unlikely that there will be sufficient funding to progress the runway extension and therefore alternatives are being looked at such as using aircraft that can operate within the existing runway length. However, it would be imprudent to rule out the longer term possibility of the extension. Accordingly, the Council believes that the existing Plan content should be retained unaltered in respect of this issue.

SEPA (906306)

The suggested change would ensure consistency with the approach taken with other site allocations and therefore would be appropriate subject to the agreement of the Committee / Reporter.

SSE Renewables (1104522)

Although SSE’s investment in Highland’s infrastructure network is welcomed it would be inappropriate to reference it in a local development plan. Many other developers have invested in that network often just to offset the impact of their particular proposals. Moreover, the Plan looks ahead not back so reference to contributions and direct developer provision of improvements is about what should happen in the future not what did happen in the past. Accordingly, the Council believes that the existing Plan content should be retained unaltered in respect of this issue.

Glencoe Ski Centre Base Station

SEPA (906306)

The suggested change would ensure consistency with the approach taken with other site allocations and therefore would be appropriate subject to the agreement of the Committee / Reporter.

Inverlochy Castle Estate

Kilmallie Community Council (1104950)

It would be sensible to make a minor amendment to the allocation's western boundary. It currently follows the owner's fenceline but this encloses land within the 1 in 200 year fluvial flood event flood risk area. Excluding the flood risk area from the allocation would also achieve the respondent's wish to have a greater development setback and expanded green corridor adjacent to the River Lochy. If the Committee / Reporter is minded to agree then the allocation boundary could be amended as described above and the green network notation could be extended to meet this boundary on the Fort William Settlement Map.

Kishorn Yard

Aileen Grant (995776)

The Kishorn allocation encloses a long established, largely brownfield area accommodating a variety of existing and operational industrial uses and benefits from various planning permissions. It would be impracticable suddenly to reverse this planning history and substitute tourism or other similar less intensive uses. Moreover the site's relatively unique combination of existing deep water berthing and dry dock facilities led to its inclusion in the National Renewables Infrastructure Plan as a potential shorebase to service the offshore renewables sector. It would not be sensible to erode this opportunity. The site's planning permission includes a travel mode monitoring condition and allows for the possibility of local road network improvements. However, expansion of the site is not dependent upon construction of Lochcarron Bypass. The Plan content and planning permission conditions contain adequate environmental safeguards (excepting the additional reference requested by Scottish Natural Heritage below).

Scottish Natural Heritage (909933)

The suggested change would update the Plan and therefore would be appropriate subject to the agreement of the Committee / Reporter.

Nevis Forest and Mountain Resort

Scottish Natural Heritage (909933)

The suggested change would ensure consistency with the approach taken with other site allocations and therefore would be appropriate subject to the agreement of the Committee / Reporter.

SEPA (906306)

The suggested change would ensure consistency with the approach taken with other site allocations and therefore would be appropriate subject to the agreement of the Committee / Reporter.

Reporter's conclusions:

Reporter's recommendations:

Issue 4	TRANSPORT	
Development plan reference:	Connectivity and Transport, Pages 25-27	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ann Leitch (995969) Donald Donnelly (990970) Gwyn Moses (997166) Lochaber Environmental Group (1105232) Scottish Government (1101467) SSE Renewables (1104522)</p>		
Provision of the development plan to which the issue relates:	Connectivity and Transport Sub Outcome, Transport Improvements Table	
Planning authority's summary of the representation(s):		
<p>Transport Improvements Table</p> <p><u>Ann Leitch (995969)</u> Objects to the potential Caol Link Road scheme because of its closeness to the respondent's property, that it may involve compulsory purchase of the property, and that the other road safeguard route (A82 "bypass") shown on the Fort William Settlement Map would be a cheaper and easier option as it doesn't involve building a bridge over the River Lochy.</p> <p><u>Donald Donnelly (990970)</u> Objects to the Caol Link Road corridor because: more achievable transport solutions for the Fort William area are available such as better active travel connections, a first phase of the Link Road simply to connect the A830 to Lochyside and, the A82 bypass which will be better at relieving A82 congestion which is the primary problem; no funding is identified for the scheme and therefore the scheme is an unrealistic aspiration within the lifetime of the Plan; no detailed feasibility work has been commissioned for the route in 40 years; the level of developer contributions likely to result from the scheme will be very low in proportion to its total cost; the safeguarding corridor stymies development that could otherwise help meet local housing supply targets; the Plan's Transport Background Paper lists and accepts the Caol Link Road has drawbacks; the scheme has a poor Benefit Cost Ratio because local congestion is only a seasonal issue; traffic levels have not been increasing since 2006; modal shift to active travel alternatives will happen because of increasing fuel prices thus reducing congestion; moving destination uses such as the hospital to Blar Mor will ease traffic flow; and, reopening the An Aird to Inverlochy Village bridge could ease flows in the case of a temporary blockage of the A82.</p> <p><u>Gwyn Moses (997166)</u> Suggests a list of road improvements to counter A82/A830 congestion relief within the wider Fort William urban area. No specific reasons stated.</p>		

Lochaber Environmental Group (1105232)

Welcomes and supports plans to improve active travel networks across all communities. Suggests that these networks should be connected, accessible and safe. States safety concerns about two sections of the A82 that are frequently used by long distance cyclists between Onich and Fort William and the A82 from Fort William to Inverness.

Scottish Government (1101467)

Requests that an exemplar walking and cycling friendly settlement should be identified in the Plan and developed because this is required by paragraph 5.14 of NPF3. Similarly, asserts that the Plan should identify locations for and promote electric vehicle charging points because this is required by paragraph 165 of SPP and paragraph 5.30 of NPF3.

SSE Renewables (1104522)

Requests Plan recognition that SSE has historically undertaken significant improvements of key transport links within the Highlands and will continue to work closely with Transport Scotland and The Highland Council to deliver transport infrastructure improvements through the development of major infrastructure projects where possible.

Modifications sought by those submitting representations:

Transport Improvements Table

Ann Leitch (995969)

Removal of Caol Link Road from Plan (assumed).

Donald Donnelly (990970)

Relocation or deletion of Caol Link Road Corridor from Plan.

Gwyn Moses (997166)

Amendment to A82/A830 proposal to include upgrading of River Nevis bridge and roundabout to Glen Nevis. Also a new road bridge across the Lochy next to the Old Inverlochy Castle. Also a bypass from the Morrisons roundabout, past Inverlochy village to join at the New North Road development roundabout. Also a spur road across the River Lochy to join the roundabout where the police station is located and the hospital may be sited.

Lochaber Environmental Group (1105232)

More Plan support for connected active travel networks to ensure any infrastructure built is widely accessible and provides safe travel links for both pedestrians and cyclists. For example, the A82 between Onich and Fort William and the A82 from Fort William to Inverness.

Scottish Government (1101467)

Identification of an exemplar walking and cycling friendly settlement. The identification of locations for and promotion of electric vehicle charging points.

SSE Renewables (1104522)

Plan reference to SSE's previous and likely future funding of significant improvements of key transport links (assumed).

Summary of responses (including reasons) by planning authority:

Transport Improvements Table

Ann Leitch (995969), Donald Donnelly (990970), Gwyn Moses (997166)

Relief of Fort William congestion including that on the A830 and A82 is a defined improvement within the Plan and seen by the Council and most Plan respondents as a desirable objective. However, the precise nature of the transport interventions that will be most effective in reducing congestion in Fort William is subject to further transport appraisal work. The Plan's Fort William Settlement Map depicts two indicative routes for "relief roads", one connecting the A830 at Blar Mor with the A82 at An Aird and the other providing an alternative to the existing A82 between An Aird and Carr's Corner. To better define which transport interventions are necessary, feasible and will require developer contributions, the Highland Council and its partners have, through Hi-Trans, commissioned AECOM consultants to undertake a Fort William Pre-Appraisal transport Study. This will set transport objectives for the greater Fort William urban area and then formulate and sift transport intervention options that can help meet these objectives. This sifting process will include reference to the views of a wide variety of stakeholders (including public engagement), the best available data on transport and related matters, and analysis of local transport problems and opportunities. One of the key deliverables of the Study will be a short list of transport interventions requiring further, more detailed, appraisal. It is hoped that the Study will be completed by May 2018. The issues raised by objectors cannot be satisfactorily resolved until the Study is undertaken. The Fort William Schedule contains further information on the specifics of particular sites affected by possible transport interventions. If and when any transport interventions are chosen and progressed then they will involve separate public consultation and (most likely) objection procedures. Therefore, it is not possible, at this stage to offer a definitive policy statement or decision on the choice, detailed design or timing of any particular transport intervention. The Council's Transport Background Paper accepts and lists brief pros and cons of certain interventions but further appraisal work is required to reach a fully considered conclusion on this matter. Accordingly, the Council believes the Plan should remain unaltered in respect of these representations pending the completion and publication of the Fort William Pre-Appraisal transport Study. The Council suggests for the Reporter's consideration that the Study be a "further information" document during the Examination process and that respondents on this issue be allowed an opportunity to comment on it through the process.

Lochaber Environmental Group (1105232)

Support welcomed. The Council recognises the limitations of several sections of the longer distance national cycle routes within Highland and the particular problems associated with the A82 trunk road. The physical constraints of Highland and the lack of funding available to the relevant public agencies hampers the search for effective solutions. Given the recent UK Supreme Court judgment in respect of strategic transport developer contributions, seeking contributions towards a long distance cycle route would be open to challenge. Therefore the Council, through the Plan, concentrates on improvements to local networks most notably by setting requirements for developers to ensure and improve connectivity.

Scottish Government (1101467)

Paragraph 5.14 of NPF3 announces a Scottish Government commitment to encourage

local authorities to develop exemplar walking and cycling friendly settlements. It does not specify where within the local authority area these settlements should be. The Council has progressed active travel masterplans / audits for 9 settlements across Highland including Fort William. These identify a core active travel network and prioritised action plans for each settlement which serve as a framework for future investment and new development. These documents inform each local development plan within Highland and justify particular active travel related developer requirements within this Plan area. The installation of a standard electric vehicle charging point in a suitable location does not require planning permission. Moreover the funding for such provision currently comes from Scottish Government grant not from the local authority or private sector. Also, live, updated information on the location, type and availability of charging points is best accessed by the ChargePlace Scotland website. For all these reasons it would be inappropriate at this time for the Plan to reference this issue. However, the Council is reviewing its Highland-wide Developer Contributions Supplementary Guidance and is considering future provision. The Council, in partnership with Hi-Trans are developing an E-Vehicle Charging Strategy and developers may be expected, in the future, to contribute towards the delivery of this strategy through the provision of e-vehicle parking spaces and charging point infrastructure. If so then the issue is best addressed through the review of Highland wide policy. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

SSE Renewables (1104522)

Although SSE's investment in Highland's infrastructure network is welcomed it would be inappropriate to reference it in a local development plan. Many other developers have invested in that network often just to offset the impact of their particular proposals. Accordingly, the Council believes that the existing Plan content should be retained unaltered in respect of this issue.

Reporter's conclusions:

Reporter's recommendations:

Issue 5	ENVIRONMENT	
Development plan reference:	Environment and Heritage, Pages 28-31	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Lochaber Environmental Group (1105232) Scottish National Parks Strategy Project (930044) SSE Renewables (1104522)</p>		
Provision of the development plan to which the issue relates:	Environment and Heritage Sub Outcome, Special Landscape Areas (SLAs), Efficient Use of Heat	
Planning authority's summary of the representation(s):		
<p>Special Landscape Areas and Other Environment Issues <u>Lochaber Environmental Group (1105232)</u> Supports Plan content regarding green networks and outcomes to better manage heritage resources. Objects to any new developments on peatlands because peatlands are vulnerable habitats that support important native species and help mitigate climate change via long term carbon storage. Requests a clear Plan definition of what is considered good environmental practice, when taking environmental considerations into account.</p> <p><u>Scottish National Parks Strategy Project (930044)</u> The respondent repeats the same objection, grounds and modifications sought as summarised in the Vision and Spatial Strategy Schedule.</p> <p><u>SSE Renewables (1104522)</u> Requests a written, technical justification for the proposed extension to the SLA at Ardgour to allow potentially affected parties to respond.</p>		
Modifications sought by those submitting representations:		
<p>Special Landscape Areas and Other Environment Issues <u>Lochaber Environmental Group (1105232)</u> Deletion of all development sites on peatland, a policy to oppose any development on peatland and a clear definition of what is considered good environmental practice, when taking environmental considerations into account (assumed).</p> <p><u>Scottish National Parks Strategy Project (930044)</u> The respondent repeats the same objection, grounds and modifications sought as summarised in the Vision and Spatial Strategy Schedule.</p> <p><u>SSE Renewables (1104522)</u> A written, technical justification for the proposed extension to the SLA at Ardgour.</p>		
Summary of responses (including reasons) by planning authority:		

Special Landscape Areas and Other Environment Issues

Lochaber Environmental Group (1105232)

The approved Highland wide Local Development Plan 2012, Policy 55: Peat and Soils, sets out the Council's approach to development and peatland across Highland. It establishes a policy presumption against a development proposal that would cause unnecessary and/or unacceptable disturbance of peat unless there are social, environmental or economic benefits arising from the proposal that would outweigh the adverse effects of that disturbance. Where disturbance is unavoidable then the policy requires that its adverse effects are assessed, minimised and mitigated. The Council accepts that since 2012 the position of the Scottish Government and its relevant agencies such as SNH and SEPA has moved towards greater protection and is now best expressed through Scottish Planning Policy and Scotland's National Peatland Plan. The Council's review of the Highland wide Local Development Plan has progressed as far as a completed Main Issues Report consultation stage. It endorses a similar direction of travel to that expressed nationally in strengthening the degree of protection of peatland. The Council believes that its general policy on peatland and development should be contained within a Highland wide Local Development Plan not within the area local development plan for west Highland. Other settlement schedules address site-specific peatland issues. The Council's development plans, suite of supplementary guidance and other guidance notes contain detailed and sufficient definition of good environmental practice for particular topic areas. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Scottish National Parks Strategy Project (930044)

As the respondent simply repeats the same objection, grounds and modifications sought as summarised in the Vision and Spatial Strategy Schedule, the Council's response is identical to that contained in that Schedule and for brevity's sake is not repeated here.

SSE Renewables (1104522)

Paragraph 1.53 of the Plan contains a sufficient, written justification for the very minor proposed change. The purpose of the change is simple: to complete the process that was progressed through the SLA citation process (The Assessment of Highland Special Landscape Areas) which was completed in 2011. One function of this process was to eliminate any small gaps or overlaps between SLAs and National Scenic Areas (NSAs). SLA and NSA boundaries were first formulated at different times, using different output map scales, by different organisations and using data of different spatial accuracy. Therefore, when overlain, the combined boundaries revealed many overlaps and some small gaps. Having two landscape areas covering the same land but each carrying a different degree of planning policy protection made little sense. Similarly, thin slithers of land between areas with similar landscape qualities and characteristics to land within those areas but carrying no protection was/is illogical. The land affected in this case is a small section of a complex ridgeline between the summits of Sgurr Ghiubhsachain and Sgorr Craobh a' Chaorainn south east of Loch Shiel. It is land which is very unlikely to attract any type of development proposal but has similar landscape qualities and characteristics to that adjoining. The proposed change is technical in nature and unlikely to have any material implications for any future planning application. Accordingly, the Council believes the Plan should remain unaltered in respect of this representation.

Reporter's conclusions:

Reporter's recommendations:

Issue 22	GAIRLOCH	
Development plan reference:	Gairloch Settlement Chapter, Pages 164-170	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mountaineering Scotland (964649) Peter Mitchell (1101574) Phil & Ian Robin (1105422) RSPB (1104965) Scottish Natural Heritage (909933)</p>		
Provision of the development plan to which the issue relates:	Placemaking Priorities, Settlement Maps, Site Allocations with Developer Requirements	
Planning authority's summary of the representation(s):		
<p>Placemaking Priorities <u>Mountaineering Scotland (964649)</u> Supports proposals to safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities.</p> <p><u>RSPB (1104965)</u> Seeks Plan amendments to offer more specific, exact and legally correct protection to natural heritage interests because: paragraph 196 of Scottish Planning Policy confirms that international, national and locally designated areas and sites should be identified and afforded the appropriate level of protection in development plans; specifically that the Inner Hebrides and the Minches Special Area of Conservation (SAC) and the Wester Ross Marine Protected Area (MPA) are referred to within Paragraph 4.6.</p> <p>North Fasaich (GL01) <u>Phil & Ian Robin (1105422)</u> Objects because the junction from Fasaich onto the B802 already has inadequate capacity to handle the increased level of traffic generated by the adjoining, new development (allocation GL02).</p> <p>Gairloch Harbour (GL04) <u>Scottish Natural Heritage (909933)</u> Conditionally supports but seeks specific reference to the An Ard Geological Conservation Review (GCR) site so that any prospective developer is aware of the need to avoid adverse impacts from inappropriate development.</p> <p>Achtercairn West (GL05) <u>Peter Mitchell (1101574)</u> Objects because: the steep bank between the site and existing housing on Low Road and Raonmor will pose a land slippage risk in the event of any construction on the allocated site; there is insufficient demand for housing in the Gairloch area, with other areas designated for housing (GL01, GL02, GL03, GL04) still unbuilt or partially completed;</p>		

demand is more focused on single plot developments; the seasonal nature of the local economy will not support demand for housing; year round employment opportunities are required to attract workers to the area or retain the available local workforce in the area; the road junction A832/B8021 already causes problems with traffic flow, school pupil movements and street parking without a new access for 8 properties exacerbating the problem; and, any new development would require significant relocation of the existing retail and residential properties to enable these issues to be resolved.

Modifications sought by those submitting representations:

Placemaking Priorities

Mountaineering Scotland (964649)

None.

RSPB (1104965)

Amendment of Paragraph 4.6 to read: "Important natural heritage designations include the An Ard Geological Conservation Review Site, the Coill 'a 'Ghlinne Ancient Woodland and the Wester Ross NSA, the Strome Carronach Ancient Woodland, the Inner Hebrides and the Minches Special Area of Conservation (SAC) and the Wester Ross Marine Protected Area (MPA)."

North Fasaich (GL01)

Phil & Ian Robin (1105422)

Removal of allocation.

Gairloch Harbour (GL04)

Scottish Natural Heritage (909933)

Amendment of developer requirements to read: "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; Transport statement; Protected species survey; Retain and where possible enhance the core path network; Site history and possible Land Contamination Site Investigation; Programme of archaeological works/mitigation may be required; Possible design statement; High quality of siting and design that will avoid adverse impacts on the special qualities of the Wester Ross NSA and An Ard Geological Conservation Review (GCR) site."

Achtercairn West (GL05)

Peter Mitchell (1101574)

Removal of allocation.

Summary of responses (including reasons) by planning authority:

Placemaking Priorities

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. Accordingly, the Council believes the

Plan's content should remain unaltered in respect of this issue.

RSPB (1104965)

The Plan is written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore the listing of every natural heritage designation would be disproportionate. The Inner Hebrides and the Minches SAC sits to the west of Gairloch with no physical proximity or proven environmental connectivity to the SDA. Similarly the Wester Ross MPA lies to the north of Gairloch and has no physical proximity or proven environmental connectivity. Accordingly, the HRA screened out all the allocations in Gairloch. The HwLDP provides adequate policy coverage to address proposals outwith the Gairloch SDA. Therefore, the Council does not consider that a reference should be made to either the Inner Hebrides and the Minches SAC or the Wester Ross MPA and that the Plan's content should remain unaltered in respect of this issue.

North Fasaich (GL01)

Phil & Ian Robin (1105422)

In common with many other West Highland settlements, finding development land in Gairloch that is marketable, serviceable, available, and free of crofting, physical and environmental constraints is very difficult. Gairloch's elongated, linear pattern is a product of these factors and constraints. Site GL01 was allocated because it is available for development, doesn't compromise the better in-bye croft land and can be connected to infrastructure networks through adjoining development. Access to the site is to be taken from the B802 using the existing junction and access road through the Fasaich development. Space within the existing development has been reserved for this purpose. The B802 has a relatively low level of traffic and capacity is not judged to be a significant issue. The width of the access road and radii of the junction are sufficient. The only concern with this access is the visibility which currently measures at 2.5m x 90m in both directions. The THC standard for a 40mph road is 2.5m x 120m. However, specific details regarding visibility splays are generally addressed at the planning application stage. The poor vertical alignment of the B802 at this location has a traffic calming effect that lowers traffic speeds. Given the lack of unconstrained, alternative development sites then the Council believes that a less than full standard visibility should be supported. If the allocation were removed then no new dedicated housing sites would be allocated within Gairloch as part of this Plan. Accordingly, the Council believes the Plan content should remain unaltered in respect of this site.

Gairloch Harbour (GL04)

Scottish Natural Heritage (909933)

The An Ard Geological Conservation Review (GCR) site is specifically mentioned in Paragraph 4.6. Whilst there is some overlap between the An Ard GCR site and the allocation, the Strategic Environmental Assessment identified that development of the site was unlikely to have an effect on the An Ard GCR site. The main development proposal within the allocation is the former fish factory site which planning permission ref: 16/01798/FUL was granted on 27th November 2017 for the demolition of a single house and the erection of 14 houses. This application includes some significant earthworks, however SNH have not commented on this application. Another possible proposal within the allocation is for a marina comprising floating pontoons, which is not considered to have any adverse effect on the geology of the area. It is unlikely that any other small scale or infill development could be accommodated within the overlap of the allocation and the An Ard GCR. However, if the Committee / Reporter is minded to agree then the addition of the

wording suggested by SNH would not add unduly to the length of the Plan and would offer clarification to prospective developers and therefore would be acceptable to the Council.

Achtercairn West (GL05)

Peter Mitchell (1101574)

Housing requirements are assessed on a wider scale than individual settlements. The 2015 Highland Housing Need and Demand Assessment identified the need for an additional 608 housing units within the Wester Ross Housing Market Area [* Table 4-7, pg86]. An indicative capacity of 77 houses has been provided for in Gairloch (this includes housing already complete/under construction). A variety of sites are therefore required to provide choice and flexibility. The site allocation is for Mixed Use rather than just housing which includes provision for business and retail uses that could help to support a year round economy. Moreover, there is already a developer requirement for “possible A832/B8021 junction improvements”. The preference being for access to the A832 towards the southern end of the site on the outside of the existing bend and sustainable transport connections to the B8021. As such there is no need to move any existing properties. Any specific site layout and/or engineering solutions required to facilitate the development would generally be addressed through the planning application process. However, if the Committee / Reporter is minded to agree then an additional developer requirement could be added to include a setback distance from the bank running along the western edge of the site. Similarly, it would also be useful for the Plan’s developer requirement wording to clarify that no buildings should occupy the southern half of the site where such development could adversely impact public views across Loch Gair. If the Committee / Reporter is minded to agree then this wording could be amended to ensure that buildings are limited to the northern half of the site.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 23	KYLE OF LOCHALSH	
Development plan reference:	Kyle of Lochalsh Settlement Chapter, Pages 171-176	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mountaineering Scotland (964649) Rhona Jack (1096238) RSPB (1104965)</p>		
Provision of the development plan to which the issue relates:	Placemaking Priorities, Settlement Map, Site Allocations with Developer Requirements	
Planning authority's summary of the representation(s):		
<p>Placemaking Priorities <u>RSPB (1104965)</u> Requests addition of wording to identify and protect the Inner Hebrides and the Minches Special Area of Conservation, the Lochs Duich, Long and Alsh Reefs Special Area of Conservation (SAC) particularly in relation to sites KL07 and KL09 which should be required to assess and demonstrate appropriate mitigation against any adverse effects on these designations (assumed).</p> <p><u>Mountaineering Scotland (964649)</u> Supports a Placemaking Priority to safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities</p> <p>Plock of Kyle (KL07) <u>Rhona Jack (1096238)</u> Objects to the inclusion of a campsite or any development that would potentially restrict the local population's access to the Plock. Supports development of an outdoor recreation/education facility associated with the nature and landscape of the Plock and surrounding area.</p>		
Modifications sought by those submitting representations:		
<p>Placemaking Priorities <u>RSPB (1104965)</u> Amendment of the first sentence of Paragraph 4.10 to read: "Development in Kyle of Lochalsh has the potential to have a likely significant effect on the Inner Hebrides and the Minches Special Area of Conservation and/or the Lochs Duich, Long and Alsh Reefs Special Area of Conservation (SAC), alone or in combination with other developments affecting the SAC. Any development of sites KL07 or KL09 will be required to assess and demonstrate appropriate mitigation measures which ensure avoidance of any adverse effect on the integrity of the Inner Hebrides and the Minches Special Area of Conservation and the Lochs Duich, Long and Alsh Reefs Special Area of Conservation."</p> <p>Amendment of the sixth Placemaking Priority to read: "Preserve the integrity of the rich</p>		

natural heritage of Loch Alsh and the wider natural heritage interests of the Lochs Duich, Long and Alsh SAC and the Inner Hebrides and Minches SAC."

Amendment of the final Placemaking Priority to read: "Safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities, in particular the Kyle-Plockton SLA, the Lochs Duich, Long and Alsh Reefs SAC and the Inner Hebrides and the Minches SAC"

Mountaineering Scotland (964649)

None.

Plock of Kyle (KL07)

Rhona Jack (1096238)

Seeks clarification that proposed development will not impinge on the existing recreational use of / and access to the site for local people (assumed).

Summary of responses (including reasons) by planning authority:

Placemaking Priorities

RSPB (1104965)

The Plan is written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore the listing of every natural heritage designation would be disproportionate. Developer requirements for sites KL07 and KL09 already state that "Development Proposals must demonstrate that there would be no adverse effect on the integrity of the Inner Hebrides and the Minches and Lochs Duich, Long and Alsh Reefs SACs or Loch Duich, Long and Alsh MPA (including during construction as well as any operational activities that arise from development)". However, the suggested additional reference to Paragraph 4.10 is relatively short, relevant and if the Committee / Reporter agree then the Council would support this change for the sake of consistency with the HRA. The suggested additional references within the Placemaking Priorities are repetitive. As such it is not considered necessary for them to be included in two different Placemaking Priorities and if the Committee / Reporter agree then the Council would support the change relevant to the sixth Placemaking Priority only as the final Placemaking Priority primarily relates to landscape concerns.

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

Plock of Kyle (KL07)

Rhona Jack (1096238)

The Plan allocation's existing developer requirement text safeguards and seeks to enhance recreational access via a recreational management plan and core path network. A small scale camp site with appropriate management would not be prejudicial to recreational access. Moreover, the land is now controlled by the Kyle and Lochalsh Community Trust

whose remit [*] includes preserving and enhancing the local recreational value of the Plock. Accordingly, the Council believes that the Plan's content should remain unaltered in respect of this issue.

Reporter's conclusions:

Reporter's recommendations:

Issue 24	LOCHCARRON	
Development plan reference:	Lochcarron Settlement Chapter, Pages 177-184	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Aileen Grant (995776) James Goodman (1100932) Lochcarron Community Development Company (998540) Lochcarron Community Development Company (997552) Lochcarron Leisure Centre Company (998545) Lochcarron Properties Ltd (998528) MacLean-Watt Family (998549) Mountaineering Scotland (964649) Scottish Natural Heritage (909933) Tony Caminiti (997141)</p>		
Provision of the development plan to which the issue relates:	Placemaking Priorities, Settlement Maps, Site Allocations with Developer Requirements	
Planning authority's summary of the representation(s):		
<p>Placemaking Priorities <u>Aileen Grant (995776)</u> Requests that Placemaking Priorities are augmented to reference the need for traffic calming of the village spine road, coastal protection works, environmental improvements of the foreshore, more effective village gateways for visitors and enhanced cyclist facilities. All these measures would diversify the local tourism economy, tackle fragility and enhance the quality of life of local residents. Supports the proposed bypass route, agrees that this line must be safeguarded for the future and would like the project brought forward. Requests that all greenspaces and burnsidcs within the village should be identified and protected.</p> <p><u>Mountaineering Scotland (964649)</u> Supports proposals to safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities.</p> <p><u>James Goodman (1100932)</u> Feels that provision of footpath between the village and the Smithy should be included in the Plan.</p> <p>LC01: Keilburn Crescent <u>Tony Caminiti (997141)</u> Objects because of risk of subsidence, slope stability and surface water drainage issues that could cause damage to neighbouring properties. Relates that these concerns have been raised previously during the consideration of planning permission 11/03539/PIP (as well as the current application 17/03808/MS) and a structural engineering survey was commissioned as part of this. Reports that conditions were attached to the permission requiring a comprehensive structural engineering study, addressing the issues of</p>		

subsidence to the existing houses (including respondent's property), providing substantial soil studies addressing the issue of soil removal, a geotechnical investigation regarding the presence of bedrock, and a detailed plan on dealing with the extensive water run off that exists on the hill between the existing houses and the proposed development. Believes that if the development of the site were permitted without all of the restrictions set in place by the Council in 2012 being implemented then the houses and the personal safety of those living just above the proposed development site would be at risk. Supplies copies of the engineering report and correspondence with councillors and council officers [*].

Lohcarron Properties Ltd (998528)

Clarifies that site benefits from extant planning permission in principle. Opposes imposition of any developer requirements additional to those conditioned in that permission.

LC02: Sage Terrace

Lohcarron Properties Ltd (998528)

Supports housing development on this site.

LC03: Kirkton Gardens North

Lohcarron Properties Ltd (998528)

Supports allocation but would oppose any developer requirements additional to those conditioned in planning permission ref: 11/003540/PIP.

LC04: Kirkton Woodland

Lohcarron Community Development Company (997552)

Supports proposals (assumed) and seeks clarification of the developer contributions regarding the access to the site.

Lohcarron Community Development Company (998540)

Supports mixed use development and states that this will bring significant economic benefit to the local community.

LC05: Kirkton Expansion Area

MacLean-Watt Family (998549), Lochcarron Leisure Centre Company (998545) & Lochcarron Properties Ltd (998528)

Supports housing and a new community/sports centre on the site and suggests that the indicative housing capacity could be increased.

LC06: Kirkton Expansion Area (Long Term)

Lohcarron Properties Ltd (998528) & MacLean-Watt Family (998549)

Supports housing on the site but does not consider there is any potential for mixed-use.

LC07: Tullich Industrial Estate

Scottish Natural Heritage (909933)

Seeks wording to identify the recently designated Loch Carron Marine Protected Area (MPA) as part of the Developer Requirements to avoid development that either creates pollution, disturbs the seabed or alters the flow of water and sediment deposition that has the potential to affect the species and habitats of the MPA.

Modifications sought by those submitting representations:

Placemaking Priorities

Aileen Grant (995776)

That the Placemaking Priorities are augmented to reference the need for: traffic calming of the village spine road; coastal protection works; environmental improvements of the foreshore; more effective village gateways for visitors and enhanced cyclist facilities; safeguarding of the proposed bypass route and its early implementation; and, protection for all greenspaces and burnsidings within the village (assumed).

Mountaineering Scotland (964649)

None.

James Goodman (1100932)

Provision of a footpath between the village and The Smithy.

LC01: Keilburn Crescent

Tony Caminiti (997141)

Removal of allocation (assumed). In any event, a Plan commitment that the conditions attached to the original planning permission in principle are applied and implemented in full (assumed).

Lohcarron Properties Ltd (998528)

Plan text to confirm that future proposals will not be subject to any developer requirements additional to those outlined in planning permission ref: 11/03539/PIP.

LC02: Sage Terrace

Lohcarron Properties Ltd (998528)

None.

LC03: Kirkton Gardens North

Lohcarron Properties Ltd (998528)

Seeks confirmation/clarification that future proposals are not required to provide any additional requirements to those outlined in planning permission ref: 11/03540/PIP.

LC04: Kirkton Woodland

Lohcarron Community Development Company (997552)

Seeks clarification regarding the developer contributions as they relate to the access from 'LCH3' as this notation does not appear on the corresponding plan and the potential access that had been identified through public consultation.

Lohcarron Community Development Company (998540)

None.

LC05: Kirkton Expansion Area

MacLean-Watt Family (998549), Lohcarron Leisure Centre Company (998545) & Lohcarron Properties Ltd (998528)

Increase in Plan's indicative housing capacity for site (assumed).

LC06: Kirkton Expansion Area (Long Term)

Lohcarron Properties Ltd (998528) & MacLean-Watt Family (998549)

Amendment from mixed-use to housing only allocation.

LC07: Tullich Industrial Estate

Scottish Natural Heritage (909933)

Insertion of “or the Loch Carron Marine Protected Area (MPA)” to the end of the Developer Requirements text.

Summary of responses (including reasons) by planning authority:

Placemaking Priorities

Aileen Grant (995776)

It is assumed the respondent is seeking a Plan commitment to a package of village improvements. Many of the suggested improvements such as repairing coastal protection works, cycle facilities, tourism initiatives, visitor photo / viewpoint facilities and traffic calming measures normally would not require planning permission and are therefore outwith the scope of a development plan. Such improvements could justify a developer requirement reference if they fell within or were functionally connected to a Plan allocation. The respondent makes no such connection and the Council does not believe that there is a sufficient connection between any allocation and the improvements listed.

The proposed Lochcarron Bypass Scheme road shown on both of the Lochcarron Inset Maps is one of several route options that were identified as part of the wider Strome ferry bypass transport appraisal work. This was brought forward due to regular rock falls affecting the A890 at Strome ferry. One particular rockfall in December 2011 led to the closure of the A890 for several months resulting in a 130 mile diversion. Unfortunately, at present, there is insufficient funding identified within either Transport Scotland's or the Highland Council's capital programme to progress any suitable scheme. Consideration of funding, route and engineering options is ongoing. However, the constraint exists, is serious and therefore justifies reference in the Plan even if this reference is to an aspirational rather than a committed scheme.

Two types of greenspace have been identified as part of the Plan: those cherished by the wider community as public open or other amenity space such as woodland; and, green networks which are important for the movement of humans and wildlife. The cherished greenspaces are areas where the Council would not wish to support any development. Several of the burns running through Lochcarron have already been identified as part of the Green Network as shown on the Lochcarron settlement maps. However, verges of farm tracks would not meet the Council's criteria because they do not provide a significant public, amenity value and are not vital to the continued passage of people and wildlife.

Given the above, the Council believes the Plan's content should remain unaltered in respect of these issues.

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

James Goodman (1100932)

The Council agrees that an active travel link to the Smithy community hub is desirable but does not believe that such a link is feasible. It would be around 2.5 km in length and a full

specification footway would cost around £750,000. There is also the issue of seeking the agreement of landowners. Accordingly, the Council believes the Plan content should remain unaltered in respect of this issue.

LC01: Keilburn Crescent

Lohcarron Properties Ltd (998528) & Tony Caminiti (997141)

The principle of development at this site was formally established by the Council's granting of permission reference 11/03539/PIP [*]. Prior to this the site, although unallocated, was within the Lochcarron settlement development area (SDA) of the 2006 Wester Ross Local Plan which also accepted the principle of development subject to the site-specifics of any proposal and location. The Proposed Plan references and replicates the PIP permission requirements. The Council does not propose to alter or amend these developer requirements. Planning application reference 17/03808/MSA [*] which details the matters outlined in permission 11/03539/PIP is currently under consideration by the Council. A number of objections have been made to this proposal which is likely to be considered at the Council's North Planning Applications Committee in June 2018. It is not considered necessary or appropriate to remove the allocation from the Plan because the Council believes the principle of the land's development for housing is still reasonable and that the objector's concerns can be addressed through the Plan's developer requirements. However, the site's capacity is limited by its constraints which include slope stability, woodland and drainage issues. The capacity is also related to how feasible it is to mitigate these issues. The PIP permission's and Plan's indicative 6 unit capacities are based on the need for, and results of, further assessment work. However, this work and an interpretation of it will not be available to Members until the June 2018 North Planning Applications Committee meeting. Accordingly, it would be reasonable for the Ross and Cromarty Committee to agree that the matter of the capacity of the site relative to its constraints and the feasibility of mitigating these constraints be considered further: by the case officer for the pending application; the North Planning Applications Committee in determining the application; and, by the Planning and Environmental Appeals Division (DPEA) during the Plan's Examination (and also if necessary by the Reporter handling any appeal against any refusal of the pending application). Otherwise, the Council believes the Plan's content should remain unaltered in respect of this issue.

LC02: Sage Terrace

Lohcarron Properties Ltd (998528)

Lohcarron Properties Ltd's commitment to delivering housing on this site is noted / welcomed. There is a factual error requiring correction. The settlement map site labels for sites LC02 and LC03 are transposed and will be reversed.

LC03: Kirkton Gardens North

Lohcarron Properties Ltd (998528)

No additional developer requirements are proposed for this allocation within the Plan. There is a factual error requiring correction. The settlement map site labels for sites LC02 and LC03 are transposed and will be reversed.

LC04: Kirkton Woodland

Lohcarron Community Development Company (997552)

There is a factual error which the Council accepts should be corrected. LCH3 should read LC03 in the developer requirements. As above, the Council also accepts that the settlement map site labels for sites LC02 and LC03 are transposed and should be reversed.

Lohcarron Community Development Company (998540)

Lohcarron Community Development Company's commitment to delivering mixed-use development on this site is noted / welcomed.

LC05: Kirkton Expansion Area

MacLean-Watt Family (998549), Lochcarron Leisure Centre Company (998545) & Lochcarron Properties Ltd (998528)

Support for housing and a new community/sports centre on the site is noted / welcomed. The housing capacity was calculated to promote efficient use of the land and has taken account of the proposed community use and other constraints including a watercourse (with a 6m buffer as per the developer requirements), woodland and the safeguarding of the proposed Lochcarron Bypass Scheme route which runs through the site. This significantly limits the developable land for housing to 35% of the site and with the standard rural density of 10 houses per hectare this results in the indicative capacity of 30 houses. Planning applications are expected to be generally consistent with the indicative capacities specified. However a different capacity than that specified may be acceptable subject to detailed design that demonstrates efficient use of land and a satisfactory site layout. Whilst it is accepted that the housing capacity could potentially be increased, the constraints noted above, particularly the safeguarding of the proposed bypass route, would need to be taken into account in any proposal. It is not considered that the capacity could therefore be significantly increased. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this site / issue.

LC06: Kirkton Expansion Area (Long Term)

Lohcarron Properties Ltd (998528) & MacLean-Watt Family (998549)

Support for housing on the site is noted. As this is a long term development site and there are sufficient other mixed-use / community allocations within Lochcarron, if the Committee / Reporter is minded to agree then an amendment to a housing long term site would be acceptable to the Council.

LC07: Tullich Industrial Estate

Scottish Natural Heritage (909933)

If the Committee/Reporter is minded to agree then the insertion of the suggested text ("or the Loch Carron Marine Protected Area (MPA)" to the end of the Developer Requirements) would be acceptable to the Council. It is a concise and relevant addition.

Reporter's conclusions:

Reporter's recommendations:

Issue 25	POOLEWE	
Development plan reference:	Poolewe Settlement Chapter, Pages 185-189	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mountaineering Scotland (964649) RSPB (1104965) William Scambler (1104701)</p>		
Provision of the development plan to which the issue relates:	Placemaking Priorities, Settlement Map, Site Allocations with Developer Requirements	
Planning authority's summary of the representation(s):		
<p>Placemaking Priorities <u>Mountaineering Scotland (964649)</u> Supports a Placemaking Priority to safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities</p> <p><u>RSPB (1104965)</u> Seeks Plan text to safeguard the better croft land with agricultural potential and identify the Wester Ross MPA (assumed).</p> <p>Shorefield (PE01) & Builders Yard Field (PE02) <u>William Scambler (1104701)</u> Objects because: Highland Council consistently permit building on arable land as it is easier and cheaper to do so; and, that Highland Council and other bodies place a higher value on the vast areas of peatlands compared with agricultural land which is limited. Suggests that building on peatlands adjacent to the settlement is viable / practicable as shown by site PE04 and that Highland Council should prioritise the preservation of agricultural land, regardless of current value, to protect the livelihood and sustenance of future generations.</p>		
Modifications sought by those submitting representations:		
<p>Placemaking Priorities <u>Mountaineering Scotland (964649)</u> None</p> <p><u>RSPB (1104965)</u> Amendment of the final Placemaking Priority to read: "Safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities and the better croft land with agricultural potential, in particular the Wester Ross NSA and the Wester Ross MPA."</p> <p>Shorefield (PE01) & Builders Yard Field (PE02) <u>William Scambler (1104701)</u> Removal or relocation of allocation to peatland area outwith the village development</p>		

boundary (assumed). Placemaking Priority to a) take a long term view and prioritise the preservation of arable land based on its potential value to the livelihood and sustenance of future generations and b) prioritise housing development within peatlands and other rough or rocky sites which are more abundant and has less value than the potential of arable ground (assumed).

Summary of responses (including reasons) by planning authority:

Placemaking Priorities

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

RSPB (1104965)

The Plan is written to be concise and not overly representative of any particular agenda, issue or sectoral interest and therefore the listing of every natural heritage designation would be disproportionate. Particular reference is already given to the Wester Ross National Scenic Area, given its' sensitivity to built development, even within SDAs. An additional reference to the Wester Ross MPA would be concise and specifically relevant if the Committee / Reporter is so minded then the Council would accept this additional reference. The suggested, additional, general reference to croft land would be inappropriate.

Shorefield (PE01) & Builders Yard Field (PE02)

William Scambler (1104701)

One of the key criteria for development plan site selection is viability. It is not sensible for a planning authority to allocate a site that has little or no chance of implementation because its preparation and servicing costs far outweigh its development value. Public subsidy can help activate marginal sites but the public purse cannot reasonably be expected to plug significant gaps in the economics of developing land. For example, affordable housing providers in Highland are competing for central government grant aid against central belt providers who, other things being equal, can deliver affordable housing at a lower unit cost than in Highland. The Scottish Government, in delivering value for money across the country as a whole, will favour sites requiring a lower level of public subsidy. Therefore, the Highland Council's development plan site selection process favours sites that are not likely to require a very high level of public subsidy. In west Highland this means searching for land that doesn't flood, isn't of too steep a gradient, doesn't have a cover of deep peat, can be connected to infrastructure networks at an economic cost, has a willing landowner / crofting tenant, and ideally is within or close to an established settlement. Inevitably, this search comes into conflict with other environmental and crofting site selection criteria. Generally, poorer croft / agricultural land has higher site preparation costs, is located on the fringe or outwith crofting settlements, and has higher infrastructure connection costs.

These principles apply to Poolewe. The better croft land lies within the settlement and the suggested alternative land is outwith and very likely to have higher site preparation and

infrastructure connection costs. National planning guidance also directs most development to within settlements because this is more likely to be in a sustainable location – e.g. more likely to offer opportunities for active travel to settlement facilities. The Council tries to minimise the loss of in-bye croft land, for example the Placemaking Priorities for Poolewe recognise the importance of the crofting area at Londubh and no allocations are proposed in this part of the village. Sites PE01 and PE02 have a Macaulay Land Capability for Agriculture (LCA) classification of 4.2 and 5.2 respectively and as such are not considered to be prime agricultural land. Although LCA class 4.2 is capable of being used to grow a moderate range of crops, site PE01 uses only a small proportion of the 4.2 classification land which extends to the east and north east of the village.

There are also environmental reasons for not developing on or disturbing peatland. Peatlands not only provide an important biodiversity resource they are vital to help meet climate change targets. Scotland's peatlands are estimated to hold 1,620Mt of carbon. Healthy peatlands provide a carbon sink while any degradation will release stored CO². As such paragraph 205 of SPP states that developments should aim to minimise the release of CO₂ through the draining or disturbance of peatland. Furthermore Policy 55 of the HwLDP outlines a presumption against disturbing peat unless it can be demonstrated that it is unavoidable and the adverse effects of such disturbance are clearly outweighed by social, economic or environmental benefits arising from a development proposal. Any peatland issue for site PE02 is addressed in the current developer requirements which include the need for a "peat management plan to demonstrate how impacts on peat have been minimised and vegetation survey to demonstrate how impacts on wetlands have been avoided. Presence of deep peat and wetlands may limit area that can be developed."

The principle of development on these sites is well established with them having been allocated in the still current, adopted 2006 Wester Ross Local Plan. PE01 and PE02 lie within the more clustered western part of the village. As such they are within walking distance of village amenities which promotes active travel and sustainability. Permission was granted on 25 October 2017 for the formation of 8 serviced house plots (ref: 13/04277/FUL) [*] at site PE01.

The respondent's requested change to the Plan is unclear but is founded upon a desire to better protect croft land from housing development proposals. The Council's Highland wide Local Development Plan contains a general policy on this issue. Policy 47 Safeguarding Inbye / Apportioned Croftland sets out the Council's approach of minimising the loss of the more agriculturally productive croft land across all of Highland. The Council, in its choice of allocations in the Plan has also sought to identify land not in crofting tenure or croft land of poorer agricultural quality wherever possible. However, the planning system in general and the Plan's allocation site selection process in particular, has to weigh up other development considerations other than land capability for agriculture. Accordingly, the Council does not agree that a new policy is needed to place an additional or more restrictive presumption against housing development on croft land.

Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

Builders Yard Field (PE02) & Land South of Maelrubha Close (PE03)

There is a factual error within the developer requirements for these sites which the Council agrees should be corrected. PE02 states that "peat management plan to demonstrate how

impacts on peat have been minimised and vegetation survey to demonstrate how impacts on wetlands have been avoided. Presence of deep peat and wetlands may limit area that can be developed.” This should form part of the developer requirements for site PE03 instead.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 26	ULLAPOOL	
Development plan reference:	Ullapool Settlement Chapter, Pages 190-197	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Barbara Peffers (1102134) David Green (1105070) Gillian Barwick (1099323) Mary Petrovics (1103142) Mountaineering Scotland (964649) Richard Davies (1102052) Scottish Natural Heritage (909933)</p>		
Provision of the development plan to which the issue relates:	Placemaking Priorities, Settlement Maps, Site Allocations with Developer Requirements	
Planning authority's summary of the representation(s):		
<p>Placemaking Priorities <u>Mountaineering Scotland (964649)</u> Supports a Placemaking Priority to safeguard, through appropriate siting and design, areas protected or otherwise important for nature conservation or landscape qualities</p> <p>Former Glenfield Hotel (UP02) <u>Barbara Peffers (1102134)</u> Conditionally supports site but is concerned that the loss of the trees surrounding the site would have a detrimental effect on the area as they provide screening, visual amenity and shelter. Suggests that the retention of trees could contribute positively to the site layout and enhance any development. Is also concerned that development will overwhelm the site, which has been vacant for some time, but notes that previous 'big changes' in Ullapool have still managed to retain the 'character' and 'sense of place'.</p> <p>Shore Street Sea Front (UP05) <u>David Green (1105070)</u> Supports principle of development of a marina subject to tighter developer requirements to control the scale, siting, design and amenity impacts of any development such as: Promenade – welcomes indicative plan but supports a more substantial and sympathetic promenade to allow for space for landscaping and seating; Road Network – seeks improvements to Shore Street ferry between the filling station/slipway and the Pier; Marina Facilities – seeks planning condition to ensure that berths and safeguarded for tourist use and do not become permanently occupied; Ullapool as a Tourist and Business Destination – would support an exemplar project which add value to the landscape and environment as well as benefit the community and the economy; and, Consultation - welcomes recent commitment for open and all-inclusive public consultation.</p> <p><u>Scottish Natural Heritage (909933)</u> Seeks reference to the Wester Ross Marine Protected Area so that prospective developers</p>		

are aware that adequate safeguards should be incorporated into their proposals.

Mary Petrovics (1103142)

Objects because: village is already struggling to cope with increased traffic and visitor numbers resultant from the NC500 route; there is insufficient local tourist accommodation which is having a detrimental impact on local events; visitors come to the area for peace and quiet which has already been disturbed due to an increase in tourism; and, there will be an irreversible effect on local people and the environment.

Richard Davies (1102052)

Objects because: the development will have a detrimental visual impact on the Ullapool foreshore and surrounding area which is one of the main attractions of Ullapool; of the disturbance to residents and visitors during the construction phase which will damage Ullapool's visitor trade for years to come; and, the development would lead to visitors / tourists staying away / going elsewhere.

Gillian Barwick (1099323)

Objects because: the development will have a detrimental visual impact on the natural beauty and view of Loch Broom that will affect visitors; there will not be any significant employment benefits arising from the development; there is insufficient demand for such a development; other initiatives (NC500) will be more effective at attracting jobs and tourists; and, investment would be better targeted at road improvements, additional tourist accommodation and leaving the harbour area clear.

Modifications sought by those submitting representations:

Placemaking Priorities

Mountaineering Scotland (964649)

None.

Former Glenfield Hotel (UP02)

Barbara Peffers (1102134)

Seeks the retention of the trees surrounding the site and assurances that development will be sensitively designed to retain a sense of place (assumed).

Shore Street Sea Front (UP05)

David Green (1105070)

Amended developer requirements to ensure: a more substantial and sympathetic promenade to allow for space for landscaping and seating; improvements to Shore Street ferry between the filling station/slipway and the Pier; marina berths safeguarded for tourist use and do not become permanently occupied; an exemplar project which will add value to the landscape and environment as well as benefit the community and the economy; and, an open and all-inclusive public consultation.

Scottish Natural Heritage (909933)

Addition of the name of MPA into the developer contributions "...Demonstrate no adverse impact on the integrity of the Wester Ross Marine Protected Area (MPA);..."

Mary Petrovics (1103142)

Removal of allocation (assumed).

Richard Davies (1102052)

Removal of allocation.

Gillian Barwick (1099323)

Removal of allocation.

Summary of responses (including reasons) by planning authority:

Placemaking Priorities

Mountaineering Scotland (964649)

Mountaineering Scotland has lodged the same or similar comments in respect of many parts of the Plan. The wording it has used is similar or identical to that used by the Council in referencing landscape as an issue in settlement Placemaking Priority text. The Council has been selective by only using this wording where it is a particular issue for that locality – e.g. where there is at least one landscape designation and a potential tension with development proposals supported within the Plan. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

Former Glenfield Hotel (UP02)

Barbara Peffers (1102134)

"Retention of boundary trees and tree protection plan" already form part of the developer requirements for this site. However, it should be noted that, planning permission ref: 16/05739/FUL was granted on 27th November 2017 [*] for a housing development comprising 49 units. As part of this permission a Landscaping Plan and Tree Protection Plan have been approved and implementation of the approved detail is secured by condition. As this is a detailed permission the site layout and design have also been approved. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this site.

Shore Street Sea Front (UP05)

David Green (1105070), Scottish Natural Heritage (909933), Mary Petrovics (1103142), Richard Davies (1102052) & Gillian Barwick (1099323)

A range of comments have been received in respect of this proposal with one supportive in principle, one on a technical matter and three objections. Issues raised are given a collective Council response below but it should be noted that not all points have been made by all respondents.

Enhanced and new recreational sailing opportunities form part of the Plan's strategic aims to improve transport connections for tourist users. A marina development in Ullapool will add to this proposed network and is considered to respect Ullapool's maritime heritage. This site is seen as an extension of the allocation within the Wester Ross Local Plan 2006 [*]. This development was proposed during the "Call for Sites" phase of the Plan by Ullapool Harbour Trustees who have also provided an indicative site plan of their proposals for a marina. These proposals include widening Shore Street to 10m, the formation of a car park / reclamation area and an 8m wide promenade [*]. Most parties accept that Shore Street would benefit from improvement. Currently, delineated space for parking along the northern side of the carriageway leaves the main carriageway rather narrow (approx. 4.6m) for its

regular use by heavy goods vehicles and tour buses. Shore Street is also popular with visitors as well as locals for its largely unspoiled views out over Loch Broom. However, there is limited streetscape / amenity space to encourage or enable people to spend much time outside beyond a small seating and picnic area at either end of the street. Along the street there is only a 2.6m (approx.) wide footpath edged by the top of the sea wall. While there is access down to the shore itself, this is via steps and therefore not easily accessible to all. Improvements to Shore Street and the promenade as outlined above could bring benefit to locals as well as visitors by improving traffic flow along Shore Street and providing a more useable space to enjoy the sea / loch front.

It is perhaps more understandable that concerns are expressed about the potential adverse impact of the marina. It would be in a logical but prominent place. If the Committee/Reporter is minded to agree, then it would be appropriate to reflect those concerns through augmented placemaking priority and developer requirement text. The Council would support the following: reference to the front/shore as part of the first placemaking priority e.g. "New development must not detract from the quality of the setting of Ullapool, in particular from public views from approach roads, the path network, and the shore/front"; UP05 developer requirements expanded from 'improved promenade' to "landscaping and streetscape improvements to Shore Street and promenade using traditional materials"; UP05 developer requirements reworded as "high quality design that reflects the prominence/quality/value/importance of the setting on the front/shore and is sensitive to the adjacent Conservation Area"; and inclusion within the developer requirements of "Demonstrate no adverse impact on the integrity of the Wester Ross Marine Protected Area (MPA)".

Otherwise, issues by respondents are already addressed by the existing Plan content, overstated or unjustified. The North Coast 500 (NC500) is a tourist route developed by the North Highland Initiative to create a 'tourism product' that the whole of the north Highlands could benefit from. The route in itself is not development. However it is anticipated that the successful promotion of the NC500 may encourage associated development. The Plan recognises this and allocates land to take advantage of such opportunities. In terms of a lack of visitor accommodation, Ullapool has a variety of different types of accommodation available from hotels, guest houses, B&Bs, Airbnb and a camp/caravan site. Allocations UP04 and UP06 include tourism as part of their use. As such the Council would support tourist accommodation within these allocations. Accommodation such as Airbnb and small scale B&B or self catering lets could be absorbed by the local housing stock or as part of individual windfall sites. In terms of loss of view, there is no legal right to a private view. In any event, Shore Street properties already overlook a working fishing and ferry port. Community consultation will be a default because the site area of this development (approx. 4.7ha) suggests that any development brought forwards for the whole allocation would be classed as major development. Construction pollution / disturbance is a matter that would be conditioned through the development management process. The proposal's origin lies with the Ullapool Harbour Trustees and has no current Highland Council capital programme allocation. It is not therefore diverting monies that could be spent on other Council functions.

Reporter's conclusions:

Reporter's recommendations:

Issue 27	WESTER ROSS & LOCHALSH GROWING & COMMUNITY PLAN SETTLEMENTS	
Development plan reference:	Wester Ross & Lochalsh Growing & Community Plan Settlements, Pages 198-208	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Duncan Cameron (1105205) Mountaineering Scotland (964649) RSPB (1104965) Scottish Natural Heritage (909933)</p>		
Provision of the development plan to which the issue relates:	Issues and Placemaking Priorities for Auchtertyre, Aultbea, Balmacara and Reraig, Dornie, Glenelg, Plockton, Torridon, Shieldaig and Applecross	
Planning authority's summary of the representation(s):		
<p>Auchtertyre <u>Scottish Natural Heritage (909933)</u> Seeks change to the last bullet point of the Placemaking Priorities to clarify that the natural heritage interests in this location are woodland rather than harbour porpoise.</p> <p>Aultbea <u>Scottish Natural Heritage (909933)</u> Seeks specific references to the Inner Hebrides & the Minches Special Area of Conservation (SAC), Wester Ross National Scenic Area (NSA) and the Wester Ross Marine Protection Area (MPA) because protected areas are designated for different interests, which in turn are affected differently by development. By identifying which protected areas have the potential to be affected, adequate safeguards can be incorporated into proposals from the outset.</p> <p><u>RSPB (1104965)</u> Requests an additional Placemaking Priority to ensure that development does not compromise the integrity of croft land essential for safeguarding crofting activity for future generations.</p> <p>Balmacara and Reraig <u>Scottish Natural Heritage (909933)</u> Seeks additional Placemaking Priority to safeguard local natural heritage interests, particularly woodlands that contribute to the setting of Balmacara and Reraig because there are a number of areas protected for or otherwise important for nature conservation and landscapes in the surrounding area, which are sensitive to pollution, habitat damage, increased human activity causing disturbance and/or landscape impacts. Identifying that there are natural heritage interests in the area raises awareness of them and ensure that adequate safeguards can be incorporated into proposals from the outset.</p> <p>Dornie</p>		

Scottish Natural Heritage (909933)

Seeks additional Placemaking Priority to safeguard local natural heritage interests, particularly woodlands that contribute to the setting of Balmacara and Reraig because there are a number of areas protected for or otherwise important for nature conservation and landscapes in the surrounding area, which are sensitive to pollution, habitat damage, increased human activity causing disturbance and/or landscape impacts. Identifying that there are natural heritage interests in the area raises awareness of them and ensure that adequate safeguards can be incorporated into proposals from the outset.

4.6.5 Glenelg

Duncan Cameron (1105205)

Agrees with need to support economic development and identifies specific requirement for an authorised campsite close to the village centre because this would reduce current wild camping pressure and provide the facilities many campers expect and retain visitors locally that would otherwise pass through.

Scottish Natural Heritage (909933)

Seeks specific references to the Inner Hebrides and the Minches Special Area of Conservation (SAC), Cosag Sallow Carr Site of Special Scientific Interest (SSSI), and the woodlands that contribute to the setting of Glenelg because protected areas are designated for different interests, which in turn are affected differently by development. By identifying which protected areas have the potential to be affected, adequate safeguards can be incorporated into proposals from the outset.

4.6.6 Plockton

Scottish Natural Heritage (909933)

Seeks amendment to Placemaking Priorities to remove reference to the Special Area of Conservation (SAC), and instead insert reference to it into the final point of the Issues text because it would be helpful to identify the specific protected area that has the potential to be affected, so that adequate safeguards can be incorporated into proposals from the outset.

4.6.7 Torridon

Mountaineering Scotland (964649)

There should be a presumption against developments which devalue the visual amenity of the landscape because of the unique landscape qualities of the area around Torridon.

Modifications sought by those submitting representations:

Auchtertyre

Scottish Natural Heritage (909933)

Seeks change to the last bullet point of the Placemaking Priorities to clarify that the natural heritage interests in this location are woodland rather than harbour porpoise.

Aultbea

Scottish Natural Heritage (909933)

Seeks specific references to the Inner Hebrides & the Minches Special Area of Conservation (SAC), Wester Ross National Scenic Area (NSA) and the Wester Ross Marine Protection Area (MPA).

RSPB (1104965)

Requests an additional Placemaking Priority to ensure that development does not compromise the integrity of croft land essential for safeguarding crofting activity for future generations.

Balmacara and Reraig

Scottish Natural Heritage (909933)

Seeks additional Placemaking Priority to safeguard local natural heritage interests, particularly woodlands that contribute to the setting of Balmacara and Reraig.

Dornie

Scottish Natural Heritage (909933)

Seeks additional Placemaking Priority to safeguard local natural heritage interests, particularly woodlands that contribute to the setting of Balmacara and Reraig.

4.6.5 Glenelg

Duncan Cameron (1105205)

Addition of a specific requirement for an authorised campsite close to the village centre.

Scottish Natural Heritage (909933)

Seeks specific references to the Inner Hebrides and the Minches Special Area of Conservation (SAC), Cosag Sallow Carr Site of Special Scientific Interest (SSSI), and the woodlands that contribute to the setting of Glenelg.

4.6.6 Plockton

Scottish Natural Heritage (909933)

Seeks amendment to Placemaking Priorities to remove reference to the Special Area of Conservation (SAC), and instead insert reference to it into the final point of the Issues text.

4.6.7 Torridon

Mountaineering Scotland (964649)

There should be a presumption against developments which devalue the visual amenity of the landscape because of the unique landscape qualities of the area around Torridon.

Summary of responses (including reasons) by planning authority:

Auchtertyre

Scottish Natural Heritage (909933)

The change suggested by SNH is concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such an amendment.

Aultbea

Scottish Natural Heritage (909933)

The changes suggested by SNH are concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such amendments.

RSPB (1104965)

The suggested change is not directly relevant to this settlement and therefore the Council does not believe it should be made. The Council's general policy on the protection of croft land is set out within the Highland wide Local Development Plan. It is also noteworthy that the lead public agency on this issue, the Crofting Commission, has not endorsed RSPB's opinions in relation to this settlement.

Balmacara and Reraig

Scottish Natural Heritage (909933)

The change suggested by SNH is concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such an amendment.

Dornie

Scottish Natural Heritage (909933)

The change suggested by SNH is concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such an amendment.

4.6.5 Glenelg

Duncan Cameron (1105205)

The suggestion is sensible, non site-specific and likely to receive wider, in principle community support. If the Committee / Reporter is minded to agree then the Council would support the following additional priority: "To investigate the potential for an authorised campsite close to the village centre to offset the impact of wild camping and to diversify the range of local tourist accommodation / facilities."

Scottish Natural Heritage (909933)

The changes suggested by SNH are concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such amendments.

4.6.6 Plockton

Scottish Natural Heritage (909933)

The change suggested by SNH is concise and directly relevant and therefore if the Committee / Reporter is minded to agree then the Council would support such an amendment.

4.6.7 Torridon

Mountaineering Scotland (964649)

The landscape and other natural heritage designations that overlap the settlement and its surrounding area already provide a significant constraint to the principle, scale, location and design of development in and around Torridon. Moreover, the conservation aims of the National Trust for Scotland as the principal local landowner add another layer of protection from inappropriate development. These development factors are already referenced in the Plan's text for Torridon. Accordingly, the Council believes the Plan's content should remain unaltered in respect of this issue.

Reporter's conclusions:

Reporter's recommendations:

Issue 28	OTHER ISSUES RAISED (GENERAL, APPENDICES & OTHER)	
Development plan reference:	Other Issues Raised (General, Appendices & Other), Pages 1-5, Appendices and Plan as a whole	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
RSPB (1104965) Scottish Government (1101467) Scottish Natural Heritage (909933)		
Provision of the development plan to which the issue relates:	Introduction, Appendices, Plan as a whole, Miscellaneous	
Planning authority's summary of the representation(s):		
<p>Introduction: How To Use The Plan <u>Scottish Government (1101467)</u> Seeks additional and particular reference to national marine planning policy because the Marine (Scotland) Act 2010 and UK Marine and Coastal Access Act 2009 requires that public authorities taking authorisation or enforcement decisions that affect or might affect the marine area must do so in accordance with the National Marine Plan and any subsequent regional marine plan once adopted, unless relevant considerations indicate otherwise. This includes decisions on terrestrial planning applications and enforcement action which affect the UK marine area. Also public authorities when making decisions which are capable of affecting the marine area which are not authorisation or enforcement decisions, must have regard to National and regional marine plans. This applies to the preparation and adoption of terrestrial development plans. The Highland wide Local Development Plan reflects the role the marine plans will have in informing decision making, but since it was published before the National Marine Plan, there is merit in making reference to marine planning policy.</p> <p>Appendix 2: Glossary of Terms <u>RSPB (1104965)</u> Requests that: SAC Special Area of Conservation, SPA Special Protection Area and SSSI Site of Special Scientific Interest are added to the list of abbreviations/acronyms with a definition (supplied).</p> <p><u>Scottish Natural Heritage (909933)</u> Seeks additional glossary explanation of natural heritage designations and acronyms such as SAC, SPA, NSA, SSSI, particularly because these are referenced in an inconsistent manner throughout the proposed plan (e.g. sometimes SAC, sometimes Special Area of Conservation).</p>		
Modifications sought by those submitting representations:		
<p>Introduction: How To Use The Plan <u>Scottish Government (1101467)</u></p>		

Under the section 'How to use the Plan' on page 2 add: "WestPlan takes account of a wide range of other factors which can also influence the outcome of planning decisions, including: National planning legislation, policy and guidance including marine planning policy."

Appendix 2: Glossary of Terms

RSPB (1104965)

Addition of abbreviations/acronyms for SAC: Special Area of Conservation, SPA: Special Protection Area and

SSSI: Site of Special Scientific Interest and that these terms are defined as follows.

"Special Area of Conservation: A strictly protected site designated under the EC Habitats Directive (Directive 92/43/EEC). Special Areas of Conservation are classified for habitats and species (excluding birds) listed in Annexes of the Habitats Directive (as amended) which are considered to be most in need of conservation at a European level. These sites, together with Special Protection Areas, are called Natura sites."

"Special Protection Area: A strictly protected site classified in accordance with Article 4 of the EC Birds Directive (Directive 2009/147/EC). Special Protection Areas are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory bird species. These sites, together with Special Areas of Conservation, are called Natura sites."

"Site of Special Scientific Interest: Sites of Special Scientific Interest (SSSIs) are those areas of land and water (to the seaward limits of local authority areas) that Scottish Natural Heritage considers to best represent our natural heritage - its diversity of plants, animals and habitats, rocks and landforms, or a combination of such natural features. They are the essential building blocks of Scotland's protected areas for nature conservation. Many are also designated as Natura sites. SNH designates SSSIs under the Nature Conservation (Scotland) Act 2004."

Scottish Natural Heritage (909933)

Seeks additional glossary explanation of natural heritage designations and acronyms such as SAC, SPA, NSA, SSSI.

Summary of responses (including reasons) by planning authority:

Introduction: How To Use The Plan

Scottish Government (1101467)

The suggested addition is concise and would provide a useful update for Plan users pending a review of the Highland wide Local Development Plan. Accordingly, it is commended to the Committees and if they agree then also to the Reporter.

Appendix 2: Glossary of Terms

RSPB (1104965)

Scottish Natural Heritage (909933)

The suggested additions and definitions would provide useful clarification for Plan users. Accordingly, they are commended to the Committees and if they agree then also to the Reporter.

Reporter's conclusions:

Reporter's recommendations: