

## Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	<b>HWLDP-MIR-162</b>
Organisation/Individual:	Phillips Aitchison Limited

### Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other ( <i>Please Specify</i> )	

*If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.*

### Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	x
Inverness and A96	
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	x
Easter Ross and Nigg	
Development of Local Centres	x
Wider Countryside and Fragile Areas	x
Population and Housing	
Housing in the Countryside	x
Affordable Housing	x
Planning for an Ageing Population	x
Gypsies/Travellers	x
Retailing	x
Developer Contributions	x
Natural, Built and Cultural Heritage	x

Previously used Land	x
Wild Land	x
Water Environment	x
Renewable Energy	x
Flooding	x
Waste Management	x
Air Quality	x
Sustainable Design	x
Business and Industrial Land	x
Accessibility and Transport	
Agricultural Land	x
Subdivision of Existing Crofts	x
Allocation of Inbye Land	x
New Crofting Township	x
Small Scale New Crofts	x
Coastal Development	x
Forestry and Woodland	
Minerals	x
Open Space and Physical Activity	
Access to the Outdoors	x
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

### Key:

Background	Spatial Strategy	Policy Options	Consultation
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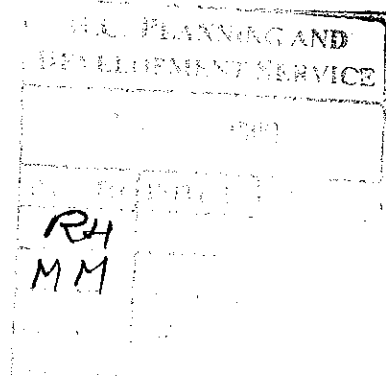
### Notes:

Section 1 of the response sent to Coastal Development Plan  
 Section 2 of the response sent to Local Transport Strategy Team  
 Need for strategy for East Sutherland  
 Conflict between elements of the vision  
 Sutherland summit needs to be taken into account  
 Retailing needs to offer a more rural scenario  
 Support the use of transport contributions  
 Air quality is not an issue  
 Need to work closely with tourism groups to promote outdoor activities

Action Sheet Completed by:	SH
Date:	10/12/09

# Phillips Aitchison Limited

Response to  
the Highland Wide Local Development Plan  
(Main Issues Document),  
the Draft Coastal Development Strategy  
and  
the Draft Local Transport Strategy



## Contents

	Page
INTRODUCTION.....	4
RESPONSE TO THE HIGHLAND COASTAL DEVELOPMENT STRATEGY.....	5
Section 2.0 Aims.....	5
Section 3.0 – East Coast .....	5
Section 3.1 – Methodology for area classification .....	6
Section 5.2 – Tourism and Recreation .....	6
Section 5.5 - Aquaculture.....	6
Section 5.7.1 - Mineral Extraction .....	6
Section 5.9 - Archaeology and Built Heritage.....	6
Section 5.10 – Nature Conservation as an engine for economic development .....	7
Section 5.11 - Landscape.....	7
Section 5.13 – Tackling Climate Change .....	7
Section 6.1 – Table, Development Opportunities for the Highland East Coast.....	8
RESPONSE TO THE LOCAL TRANSPORT STRATEGY FOR THE HIGHLANDS .....	10
Fragility and rural accessibility, and continuity of petrol supplies.....	10
Core Policy CP3: Road maintenance.....	11
Core Policy CP7: Rail Based Public Transport, Part 1 Key Route Network.....	11
Core Policy CP7: Rail based Public Transport, Part 2 Service frequency .....	12
Core Policy CP10: Parking Policy.....	13
Core Policy CP12: Freight Transport.....	13
Core Policy CP14: Road Safety Plan .....	14
RESPONSE TO THE HWLDP MAIN ISSUES REPORT .....	15
Section 3. The Vision for the Highlands .....	15
Q8. Caithness and North Sutherland .....	15
Q10. Development of Local Centres.....	15
Q11. Wider Countryside and Fragile Areas.....	16
Q12. Population and Housing Policy.....	16
Q13. Housing in the Countryside.....	16
Q14. Affordable Housing.....	17
Q15. Planning for an Ageing Population .....	17
Q16. Gypsies / Travellers .....	17
Q17. Retailing .....	17
Q18. Developer contributions .....	17
Q19. Natural, built and cultural heritage.....	18
Q20. Previously Used Land.....	18
Q21. Wild Land .....	18
Q22. Water Environment .....	18
Q23. Renewable Energy .....	18
Q24. Flooding .....	18
Q25. Waste Management.....	18
Q26. Air quality.....	19

Q27. Sustainable design.....	19
Q28. Business and industrial land.....	19
Q29 – 33. Crofting.....	19
Q34. Aquaculture.....	19
Q36. Minerals .....	19
Q37 - 38. Outdoor Activities.....	20
APPENDIX 2 Submission by Laid Common Grazings Committee.....	23
APPENDIX 3 - Commentary on Unsustainable Dornoch Firth Rail Link Proposal.....	25
Contravention of Scottish Government Planning Policy on Flood Risk.....	25
Destruction of Internationally Protected Environments .....	26
Detriment to the Economy of Sutherland.....	28
Availability of viable alternatives.....	29

## INTRODUCTION

This document contains our responses to the Highland Wide Development Plan – Main Issues Report, the Draft Coastal Development Strategy and the Draft Transport Strategy. We deal with the Main issues report last, since the other documents should influence what it contains.

It is important to ensure that the three documents are aligned and consistent with one another. There are numerous instances where the current drafts are not, and it is important that Highland Council review the next versions to put this right.

The previous Structure Plan system has been concerned primarily with built development and transportation – what can be built and what can't, where and where not, and often without much concern for economic growth. The welcome Scottish Government objectives for economic growth, the resulting National Outcomes and the Single Outcomes Agreement which have been created as a result, mean that greater emphasis must now be placed on nurturing the economy of the Highlands, and especially its fragile areas. This also creates some complex relationships with other bodies.

For this reason our submissions run more widely than they might have done in previous years.

Our submissions are primarily concerned with Sutherland and our principal themes are:

- the lack of any strategy for East Sutherland in the Main Issues Report, which must be remedied in the HWLDP.
- failure to take into account any of the outcomes of the recent Sutherland Summit, key among those being:
  - a requirement for population growth as a pre-requisite for a local market (and if we add a few thousand to the population over time, they need private sector work)
  - recognition that support for business start ups and related services must be tailored to the needs of very small enterprises, since so many in Sutherland are micro-businesses.
- the importance of tourism to the Sutherland economy and
  - the need for a coherent and co-ordinated approach to developing it
  - the inter-relationship between protecting the special landscape and heritage of Sutherland, and its success as a tourist destination.
- the importance of fostering and expanding the unique contribution to Highland life which crofting provides, but the need to align development control with emerging Scottish Government proposals.

## RESPONSE TO THE HIGHLAND COASTAL DEVELOPMENT STRATEGY

The use of "Inner Moray Firth" in this document and in the HWLDP Main Issues Report is confusing. One minute it is accurately used to describe an area of sea and coastline. The next it becomes an inaccurate label for a large area of Inverness dormitory hinterland which goes no further north than Tain, and many miles inland. It would be better if the Inverness hinterland were called something else. In any event, the term needs clarification on a map for the Coastal Development Strategy, and to show that it covers the entire coastline as far north as Helmsdale, all of which is classified as of International Importance; and includes the sea area out to a line drawn between Helmsdale and Burghead.

### Section 2.0 Aims

This section states: *"the scope of the HCDS is to provide strategic vision and guidance for development on and around the Highland coast i.e. development in the planning sense ..... the HCDS thus provides a classification of the Highland coast which is linked directly to national planning policies ..... but the guidance it offers is largely non-statutory and supplementary to the HWLDP"*. It seems to us that there is little point in producing this strategy, or in commenting on it, unless the document has considerable weight in framing the policies which end up in the HWLDP. We certainly expect that to be the case. We regret to note the many inconsistencies between this document, the Draft Transport Strategy and the Main issues Report, and it is essential that we see these resolved in the final outputs.

We strongly agree that one of the three principal aims of the strategy should be to *"guide the sustainable development and use of Highland's coastal zone whilst safeguarding its natural and cultural heritage assets"*.

At the Rural Gathering conference in Perth (25/9/2009), Professor David Freshwater of the OECD pointed out that remote and economically vulnerable areas all turn to tourism as their saviour and said, *"you can't all live off tourism. Tourism has to be done well if it is to support your economy"*.

Our point here is that the Strategy needs to recognise explicitly the relationship between economic development and landscape conservation (together with archaeological and built heritage), since these are the key assets which sustain tourism in the North Highlands. Anything which causes a significant detriment to conservation will damage the economic wellbeing of the Far North.

### Section 3.0 – East Coast

In paragraph 2 we would like to see the list of examples containing Dornoch Firth and Duncansby Stacks changed to include Loch Fleet. We will return to this later on, but Loch Fleet is arguably one of Scotland's most outstanding National Nature Reserves, and one of the least well known.

### **Section 3.1 – Methodology for area classification**

In Figure 1, why is National Scenic Area the senior classification for landscape, at the expense of areas of international (meaning greater) importance? This appears to reduce the extent of the area requiring special protection.

### **Section 5.2 – Tourism and Recreation**

Tourism will be a vital feature of the future economy of Sutherland. It is essential that we redress the lazy VisitScotland assumption (supported by the Highland Council's own narrative) that anything of value is on the West Coast.

East Sutherland is equally rich in brochs, standing stones, souterrains, hut circles, cairns and industrial archaeology. These are grossly under-promoted.

Specific suggestions appear under 6.1 below.

### **Section 5.5 - Aquaculture**

We note in Section 5.5.3 the national policy presumption against further aquaculture on the north and east coasts, but we concur with the views of the Laid Common Grazings Committee (see Appendix 2) that some aquaculture development should be allowed in Loch Eriboll. The Laid crofting township runs along the shoreline and some form of community owned aquaculture venture could be of great economic importance to the locality.

### **Section 5.7.1 - Mineral Extraction**

It was we who drew the attention of the Laid Common Grazings Committee to this section of the draft Strategy, and the Committee has kindly given us permission to reproduce in Appendix 2 the representation which it has already submitted.

We could not possibly improve on it and we support it strongly.

### **Section 5.9 - Archaeology and Built Heritage**

It is insufficient just to *"support initiatives by Historic Scotland and the Scottish Coastal Archaeology and the Problem of Erosion (SCAPE) Trust to make a systematic record of the archaeological sites on Scotland's coast and to gauge the level of threat to them"*.

As written, this section is concerned solely with conserving archaeology and built heritage in connection with development and erosion. It ignores completely the potential for archaeology based tourism which is, for example, a major source of revenue for the economy of Orkney. It follows therefore that at 5.9.4, there needs to be active promotion of the cataloguing of all such sites with an assessment of their tourism potential, and cross reference to economic development strategy. Such a linkage is well expressed at 5.10.1 with regard to natural heritage.

## **Section 5.10 – Nature Conservation as an engine for economic development**

We strongly support the commitment to protection of designated nature conservation sites through the development planning process. We would like to see this strengthened to a general presumption against development except in carefully specified circumstances, such as infill. This might restrict, for example, further encroachment onto currently unzoned land south of Dornoch in the next phase of the Local Plan, and direct future south side expansion to north of Sutherland Road.

Para 2 states: *“the Council will work with SNH and other appropriate agencies to support the development of sustainable wildlife-watching opportunities around the coast of Highland”*. We are aware of a proposal by RSPB and the Scottish Wildlife Trust to create a bird watching hide at Loch Fleet on the shore of Balblair Bay. This would require a dangerous new access on the A9 between Golspie and The Mound. Golspie Community Council would prefer such a hide to be approached through Balblair Wood from the Ferry Road, using the path and bridge recently upgraded by SNH, because it would be safer, attract extra footfall to the existing Nature Reserve, could be jointly publicised as part of any tourism initiative, and would be to the economic benefit of Golspie. Fund raising for the hide will benefit from this sort of additionality, and it would be a good example of collaborative working if Highland Council worked with the proposers to achieve it. While this is an issue of detail rather than strategy, the Strategy is littered with many other detail examples and we would like to see this logged for future action now.

We also support the SNH submission that some organisation should take responsibility for managing the impact of recreational tourism on some species and habitats. For example, recent use of Loch Fleet NNR has included jet skiers, kite surfers, quad bikers, trail bikers and mountain bikers, hang gliders and model aircraft flying.

A further commentary on the Loch Fleet National Nature Reserve is attached as Appendix 1.

## **Section 5.11 - Landscape**

We are at a loss to understand why Loch Fleet and Strath Fleet, and Duncansby Stacks are not included in the National Scenic Areas. Here is an example of the failure of the classification, (Section 3.1 above), to recognise areas of International Importance.

We note and support the SNH submission that more consideration should be given to the visual landscape of the coast especially as experienced from the sea.

## **Section 5.13 – Tackling Climate Change**

Section 5.13.1 states *“the Council has a social responsibility to ensure that communities are safeguarded against the effects of changing weather patterns”*. Section 5.13.2 describes how climate change can lead to the arrival of new fish species which present dangers to the environment. This begs the question *“so what are you going to do about it then?”*

We have already reported to the Council and SNH the routine presence of Weever fish on beaches north of Dornoch. This species is poisonous when trodden on, and it would be sensible if the Council, knowing about the issue, posted warning signs on beach-side notice boards as is the practice in other Authorities. It might at least prevent potential legal action from an aggrieved beach user. So, while Highland Council is working up its Climate Change Strategy for Highland, it would be a good idea to make sure that day to day operational issues also find a ready response.

## **Section 6.1 – Table, Development Opportunities for the Highland East Coast**

**Tourism & Recreation:** We strongly agree that *“the east coast is rich in potential opportunities for tourism and recreation development. Pooling of resources will be more important in remoter parts of the east coast to overcome the disadvantage of sparse population and distance from the main tourist market.”*

However, reading this document and the HWLDP Main Issues Report as a whole, we have been struck from time to time by the thought that the authors did not necessarily know the East Coast north of Dornoch all that well. In this section, the most disappointing text is *“northeast (sic) of Golspie and Helmsdale, visitor flows are relatively weak because, in the absence of major attractions, many tourists are drawn to the more spectacular scenery of the north and west.”* The lack of attractions is a myth routinely peddled by VisitScotland. The problem is lack of co-ordinated marketing as demonstrated at last week’s North Highland Tourism conference. Therefore, where Highland Council has a role to play, either on its own or as a member of Planning Partnerships, we should like to see more positive economic development action identified in the Strategy.

It is particularly important that the Strategy recognises the entire coastline of Caithness and Sutherland as a single destination, where extended touring holidays around the east, north and west coastline involve short stays in hotels, B&Bs or caravan sites.

As for the detail points in the table:

- we would like to see wildlife, cultural and archaeological tourism developed throughout the coastal area, and we agree with the SNH submission on this matter
- there is significant day tourism from people leaving in the region, which will not show up in official figures
- the locations which tend to be by-passed by tourists from outwith the area include the coast north of Dornoch to Caithness, not the coast north of Helmsdale as stated. VisitScotland are complicit in this, specifically telling visitors to ignore East Sutherland as *“there isn’t anything there”* (a quote passed on by an annoyed visitor).
- greater promotion of quality beaches should include Blue Flag beaches at Embo and Golspie; promotion of the quality beaches north of Brora and at Loth requires access across the railway line and the co-operation of Network Rail, with which we wish you luck.
- there is opportunity to extend sailing activity by encouraging the provision of moorings in old fishing harbours with reasonable shelter from rough seas, (Brora and Helmsdale are examples).

- there is no mention of East Sutherland's links golf courses which are of regional importance for their design, history, and economic significance
- there is no mention of the many local coastal and heritage paths which already exist but are not promoted. For example the Littleferry to Golspie coastal path, the Big Burn path and the Backies path should be integrated into a properly promoted East Sutherland Coastal Paths Network. We have seen this successfully done in other parts of Scotland.
- tourism signage is ineffective and in short supply, and tourism businesses find that officialdom either obstructs or under-delivers. A process is required to deliver requested signs within a defined and short timescale, and at a cost which struggling businesses can bear. Wearing its economic development hat, Highland Council should work with its partner organisations to deliver this under the Single Outcomes Agreement, revised if necessary.
- specifically, we support the SNH request for proper information and interpretation signage at the parking areas on the Dornoch Bridge, which by the way, is where the authors saw an osprey catch a salmon while in motion. We cannot think of any other major trunk road where it is possible to see an osprey fly across the bonnet of one's car to catch a fish.

**Agriculture & Crofting:** we strongly support the proposal for expansion of crofting, not merely for the environmental reasons set out in the table, but because crofting is a key contributor to the special cultural character of the North Highlands. We would like to see "*creating new crofting townships*" changed to read "*creating new crofting townships and extending existing townships*". Above all, we need to see crofting development find its way into the summarised strategy at 6.1.3.

**This remark applies equally to those parts of the North and West Coasts where the environment supports crofting.**

## **RESPONSE TO THE LOCAL TRANSPORT STRATEGY FOR THE HIGHLANDS**

### **Fragility and rural accessibility, and continuity of petrol supplies**

**This is a strategic issue identified in the report, and not carried forward into Core Policies**

We strongly support the identification of headline issues (2.51) as:

- cost of travel by all motorised modes (we take this to mean "by road")
- lack of investment in some settlements, partly due to accessibility – particularly where lifeline routes are substandard due to maintenance budget limits
- impact on tourism access across Highland
- distance to nearest petrol / LPG station.

Fragile areas are mapped in Sections 10.1 etc. Statistics at section 2.52 illustrate well the impact on rural populations in Caithness and Sutherland, and the reliance on car transport in those areas. It is not possible in the Far North to support any presumption that rail is the only way forward. It is a highly scattered community almost entirely dependent on a good road network and reliable fuel supplies, and in great need of a bus service which meets the needs of residents and tourists.

Summary withdrawal of the Post Bus service in some areas of Sutherland is a scandal and, Royal Mail having declined the proffered subsidy to keep it going, some alternative bus service must be planned for.

With regard to fuel supplies, the problem is not limited to the most fragile areas. There is a scarcity of petrol stations on the A9 north of the Dornoch Firth, and the prices charged can be staggering in comparison to just a few miles further south. This is caused more by the need to make a margin on low volumes, than distance from the fuel depot or lack of competition.

The arrival of Asda and Tesco in Tain presents a great threat. Supermarket petrol kills private operators in the neighbourhood, which is readily illustrated by the effect of Tesco in Dingwall. While it may seem perverse to worry about the impact of lower fuel prices in some locations, we fear that supermarket petrol pricing in Tain would fatally undermine the filling stations at Evelix, Lairg and Pittentrail. Brora could be affected too, since one of the two filling stations there is in common ownership with Evelix. We understand Evelix is also the only LPG outlet in East Sutherland. The potential impact on those communities, and those further west and north which rely on the current fuel network, poor though it is, would be unacceptable.

We would like to see Highland Council recognise this immediately as a strategic risk and engage with the Scottish Government to continue to preserve rural petrol supplies should closures result.

### **Core Policy CP3: Road maintenance**

Section 2.77 links the local transport strategy to the Single Outcomes Agreement and takes forward local outcome 10.3 "increase investment in lifeline roads and bridges in the Highlands".

At Section 2.79 the Strategy states: "*we will invest £54 million over the next three years to maintain the quality of our road network and carry out improvements to our lifeline roads and bridges*".

That is a bucket figure within which much creative accounting could be done if the budget came under pressure. Since so many roads in Caithness and Sutherland are lifeline routes, the impact of any across-the-board cut in the road maintenance budget would be disproportionately damaging to fragile communities. If that means that the budget for roads in these areas needs to be disproportionately protected, that should be so.

At Section 5.27/28, Core Policy CP3 states: "*As shown in Section 2, the Highland Council has developed an index to indicate "fragile area" status of the lightly populated rural areas of the Highland Council area. In combination with the assessment of critical importance of Lifeline Rural Roads in the area which serve communities which have no other transport link this fragility index is part of the process the Council will use to establish its priorities for road maintenance expenditure*".

We would like to see some worked examples of the how the prioritisation process works, to give reassurance that lifeline routes will indeed be protected when the budget comes under pressure to do important projects around Inverness.

We specifically note that the rate of increase in road usage in the Highland area is above the national average. We would like to see CP3 include further reduction in the extent of A-roads which are single track with passing places. Such roads contribute to accident risk, particularly when tourist volumes are high. Above all, this would reduce journey times, mitigating the economic disadvantage suffered by remote businesses and public transport services.

The most important lifeline road of all, north of Dornoch, is the A9. We applaud the improvements already made north of Helmsdale, but more is required at Berridale Braes which are highly dangerous for heavy vehicles.

### **Core Policy CP7: Rail Based Public Transport, Part 1 Key Route Network**

Section 2.83 - Rail - Scotland Route Utilisation Strategy 2007 states: "*this strategy has been developed for Scotland's railways over the next 10 years. A range of measures has been identified to make effective and efficient use of the existing railway capacity and to develop additional capacity. These measures have been selected on the basis of their value for money across the 10-year period of the strategy and are largely consistent with the National Transport Strategy*".

Dornoch Firth Rail Action Group aim to keep the proposal for a Dornoch Firth Rail Link alive despite its rejection as not credible by Hi Trans following analysis by independent consulting engineers which recommended against the proposal. The project also failed Transport Scotland's "Scottish Transport Appraisal Guidance" (STAG) test and does not currently feature in the National Rail Strategy.

Should this proposal be resubmitted for inclusion in the Transport Strategy, our reasoned objection is set out in Appendix 3.

### **Core Policy CP7: Rail based Public Transport, Part 2 Service frequency**

Section 2.79 includes the theme: *"We will work with partners to improve local, national and freight rail services including shorter journey times."*

Section 3.9 states: *"on the rail network, improvements have been achieved ... faster train journey times, notably on the Inverness to Wick route; and punctuality improvements on Invernet routes, with trains running at between 80-100% of the timetable"*.

Section 5.73 states: *"Network Rail and the train operating companies are responsible for decisions affecting frequency of service and journey times on any route and which stations are served. The Highland Council will work with its regional partners and the rail authorities to seek improvements to services where possible and where they are considered to provide optimum benefit"*.

For passenger services we suggest the following initiatives to improve take up of services on the Far North Line, which may not be new but are worth restating since significant disincentives exist to use of the train:

- introduction of improved rolling stock equivalent to that operating south of Inverness; at the same time obtaining increased provision for passengers with cycles, since present restrictions on cycle carriage are an obstacle to tourism
- increased frequency of services north of Tain from 3, to 4 or 5 a day, since it is impossible to spend reasonable time in Inverness with the timetable as it stands
- reinstated and better catering facilities
- assured connections with main line services to Perth and the Central Belt; a 6 minute connection time for main line services is ludicrously risky and is routinely missed. Invernet punctuality improvements have not been reflected, in our experience, further north. Late arrivals at Inverness mean either long waits for the next train south and loss of seat reservations or, in the writers' experience, taxis to Glasgow at First Scotrail's expense.

## Core Policy CP10: Parking Policy

### Disabled parking in Inverness

Section 5.103 states: *"Parking should consider the needs of all users including ... disabled vehicle users ... Infrastructure enhancements should be promoted to make parking attractive and user friendly by upgrading facilities and equipment considering the needs of people with mobility impairment"*.

The recent regeneration project in the City centre has reduced the availability of disabled parking spaces, and remove disabled parking from some locations altogether, which now makes routine visits impractical for those with impaired mobility. This puts additional pressure on the Morrison car park where it is now frequently impossible to park for the supermarket. This should be remedied, with the number of on-street disabled spaces increased to a number greater than that available before the project. Remember, please, that disability is not limited to those in wheelchairs and is often invisible to the casual eye. Leaving aside the difficulty now experienced by those with impaired mobility, the loss of trade to city centre retailers could be substantial.

### Park & ride

We support proposals to progress provision of park and ride schemes (Sections 2.33 and 5.104-106) but, with an eye on mixed performance of other park and ride schemes elsewhere in Scotland we recommend that Highland Council recognises that:

- the requirements of park and ride schemes differ for commuters, who travel light, and shoppers who have to manage large amounts of shopping and pushchairs.
- frequency of service and type of vehicle are important factors where people opt not to use a service, that users make service-level comparisons across market sectors, and that airport car park bus frequencies and luggage space readily present themselves as a benchmark.

Note also that park and ride is of limited use to passengers of impaired mobility unless:

- buses are of the type which lowers the entry platform to ground level (see Glasgow)
- passengers are dropped in the true centre of Inverness (e.g. outside the Victorian Market) and not at the bus station which is too far to walk to the shops for those in pain.

## Core Policy CP12: Freight Transport

Sections 5.118-121 state: *"The movement of freight is particularly valuable to the local economy of the Highland area. A significant amount of the local economy is based on the export of raw materials and goods. Export of timber by road can put additional pressure on sub-standard roads. Where possible encouragement will be given to transporting timber by canal, sea or rail. Highland will work to encourage all freight types to shift from road to rail, canal and sea where possible ... Transport of goods by rail into major settlements, i.e. Inverness and Fort William, will be supported and encouraged where possible."*

On supporting the return of freight to the railways (slightly faster journey times are not essential to a parcel), we conclude that the steep year on year decline in freight volumes (2.26) can only be explained by a combination of private freight company pricing and Government policy. The Strategy already identifies the stakeholders to engage with, and possible sources of funding, but attention must be given to the two following issues:

- Table 3 at Section 2.64 is incorrect in that EWS has been bought by German State owned DB Shenker (UK).
- the requirement for Network Rail to reinstate the 3 miles per annum track replacement programme on the Far North Line and as a matter of urgency deal with the 20 mph restriction in the Ardgay area which is necessary because of the poor state of the track.

Where transport of very large or heavy items is concerned, for example wind farm and marine energy components destined for Caithness, shipment by sea via Scrabster or Wick is preferable.

### **Core Policy CP14: Road Safety Plan**

This policy is not stated except to say that a revised Road Safety Plan is under development.

It is insufficient to state at 2.44/5 that Highland is meeting national targets and that “the Road Safety Plan for Highland will be taken forward demonstrating action to meet national targets”. Since Highland fatal and serious casualties are quoted as 198 pa compared to a national average of 273, that could be read as an excuse to do nothing.

Highland Council must recognise the continuing danger caused by open level crossings and include specific actions in the plan to engage at Government level (Health & Safety) and Network Rail (infrastructure responsibility) to eliminate open crossings.

## **RESPONSE TO THE HWLDP MAIN ISSUES REPORT**

### **General comments**

We concentrate here on issues affecting Sutherland and Caithness. Inverness and the conurbation surrounding it have plenty of coverage without the need for input from us.

### **Section 3. The Vision for the Highlands**

The plan objectives for Sustainable Highland Communities, and a Competitive, Sustainable and Adaptable Highland Economy are fine so far as they go. However there is potential for conflict between them when it comes to the remote areas. For example it has to be accepted that economic development in Sutherland involves acceptance that there will be travel, and more housing in the countryside than might have been envisaged. Walking and cycling, to the extent that they have become a general purpose planning and political cliché, are primarily urban concepts. Public transport is scarce in rural areas too, once you leave the A9 corridor, so there has to be acceptance of and tangible support for road travel and a sound road infrastructure. Otherwise "Better opportunities for all and a fairer Highland" will only apply to Inverness and its hinterland, and elsewhere young people will continue to go as soon as they leave school.

### **Q8. Caithness and North Sutherland**

We agree with the generality of the preferred option subject to our comments above on Transport Core Policies:

CP3 – Road maintenance, with particular reference to the A9 at Berridale Braes

CP7 – Rail based public transport, with emphasis on retaining the current line, maintaining it properly, and improving frequencies and the quality of passengers' experience

CP12 – transport of freight by rail, and by sea via Scrabster or Wick in the case of very large or heavy energy generation components

### **Q10. Development of Local Centres**

Sutherland must be considered as an entity and it is unreasonable to separate communities on the A9 (Dornoch, Brora and Golspie) from the rest of the county. There is absolutely no vision for East Sutherland in this Main Issues Report and this simply must be addressed in the next iteration of the Plan. All work done on that must also take into account the outputs from the recent Sutherland Summit attended by Scottish Government Ministers.

In drafting Local Developing Plans, Highland Council should survey the requirement for new premises for existing businesses in need of expansion. In Golspie, for example, three businesses have been denied the opportunity to move onto the Links site because their businesses were deemed to be "too dirty", and not in accordance with the local Enterprise Company's view of what development would be appropriate to the area. The same issue recently came up in Dingwall.

Policy for business development should reflect the needs of businesses already in situ, and not a desk-based view of what the local economy would be if it behaved itself.

Further evidence of the failure to pay any attention to East Sutherland is the map on page 31 which places Dornoch at Brora.

### **Q11. Wider Countryside and Fragile Areas**

In Sutherland the definition of a strip of land along the north and west coasts as fragile is artificial and incorrect. There may be specific landscape issues in those areas, but anywhere away from the A9 corridor is fragile, and policy approaches should be the same. For example, why would policy for crofting areas differ between Rogart and Melness? The impact of distance is merely a matter of degree.

The Sutherland Summit identified numerous strands of work which could restore the prosperity of these areas, which should be accommodated by Highland Council within the Single Outcomes Agreement. The preferred option needs to be strengthened by specific commitment to:

- population increase, not limited to the A9 corridor
- roads development
- support for business start-ups

### **Q12. Population and Housing Policy**

#### **Q13. Housing in the Countryside**

A lazy assumption appears at various points in the document that Inverness is growing, rural population is declining (though next year's census may provide evidence to the contrary), so that's all right then. The Highlands were cleared once on purpose, and it would be a pity if Highland Council helped it happen again by accident.

We reiterate our comments on the need for population growth in the remote rural areas, although such growth should be organic rather than involve large developments dropped from a great height, creating a shock to local ways of life. See for example our comments on crofting expansion below.

It is important to grow populations in a managed way. A good example of failure to get this right can be seen in some places on the Ulster / Eire border where, on the southern side, planning controls were largely abandoned in a building boom and the landscape has been turned into a sort of rural suburbia. The 1948 Act was brought in to address this sort of scattered and piecemeal development and we should not allow that sort of situation to recur.

The implied action, then, is to develop detailed settlement plans for all rural areas, working with Communities, as part of the Local Development Plan process. We should like to see that included in the preferred option now.

The preferred option should also include reference to Sutherland, as well as Caithness, in reviewing the approach taken to regeneration.

Finally, we trust that by the next iteration of the plan, the housing land requirement table will state whether it is expressing housing units, hectares or something else.

#### **Q14. Affordable Housing**

We agree with the preferred option as expressed. We would be very unhappy to see the threshold increased above 4 in Sutherland.

#### **Q15. Planning for an Ageing Population**

We agree with the preferred option as expressed. We would be very unhappy to see provision left to market forces in the remote communities, and failure to force the issue will lead to elderly people continuing to have to move away from where they have lived all their lives.

#### **Q16. Gypsies / Travellers**

We agree with the preferred option as expressed, but it has to be balanced by a swift and effective enforcement approach when illegal encampments appear, and adopting that approach should not be left until new sites have been created.

#### **Q17. Retailing**

Current policy and practice reflects an entirely urban point of view. Reference to choice and accessibility, in the mouths of supermarkets, translates rapidly into "build my shop". An argument routinely deployed by Tesco, for example, is that Clubcard data reveals that people travel from X to reach their supermarket in Y, and so a new Tesco is needed in X. The opposite is true, since if people travel from X to Y, Y is meeting their needs already.

We agree completely that a retail hierarchy is needed and that retail location cannot be developer led. That has led to Tain receiving two Co-Ops, a Lidl, a Tesco and probably an Asda, which is ludicrous for the locality. We have already started counting the shops we think will close in the surrounding area, as soon as the new supermarkets open, and we expect Highland Council has its own list too.

#### **Q18. Developer contributions**

We agree with the principle of developer contributions for large scale projects. Given that supermarkets are licences to print money, we think that the contribution sought in those cases is too small. There is also a widespread public perception that developer contributions, especially where supermarkets are concerned, might be tantamount to bribery. We approve the use of "transparent" to describe these contributions, but we would like to see the process formally and regularly audited. That becomes a more urgent requirement in cases where developer contributions are increased.

**Q19. Natural, built and cultural heritage**

We entirely agree with this proposal, but not just in the context of development control. In our comments on the Draft Coastal Development Strategy (Section 5.9) we deal with the potential for archaeology based tourism, and ask for active promotion of the cataloguing of all such sites with an assessment of their tourism potential, and cross reference to economic development strategy. Of course these remarks apply to the whole land mass and not just the coastal fringe.

**Q20. Previously Used Land**

There should be a presumption in favour of development of brownfield sites (subject to other possible overriding policy objections) but it is hard to see how a Highland-wide target for development on previously used land would work outwith urban areas, because you cannot set targets for land which may not exist.

**Q21. Wild Land**

We agree with the proposal.

**Q22. Water Environment**

We agree with the proposal in general, provide it does not lead to second-guessing SEPA who have the statutory role in leading policy.

**Q23. Renewable Energy**

We support most of the preferred option, in that it lays down an approach to policy development and is not the policy itself; and would bring more clarity to an area where there is confusion. We support the reservations expressed by SNH on landscape. We are unhappy with the way in which generation is decoupled from access to the Grid, though the alternative suggested, only allowing projects where capacity in the Grid already exists, is too passive. There should be engagement with those responsible for planning the grid. Their strategy and that of Highland Council should be developed in parallel.

**Q24. Flooding**

We agree with SNH. Incorporate the SEPA flood map in the HWLDP and use their recommendations in issuing supplementary guidance. Don't reinvent the wheel. Other than that we support the option with an added hope that Highland Council will ensure that all culverts are kept clear, to avoid a repeat of the flooding experienced in, for example, Golspie and Dingwall in recent years.

**Q25. Waste Management**

The GREAN franchise should be rolled out across North West Sutherland.

**Q26. Air quality**

Not an issue here.

**Q27. Sustainable design**

We agree with the sentiment though the wording is fluffy. Comprehensive advice should be incorporated in a new design guide, which should specifically address the potential conflict between sustainable building techniques and materials, and vernacular design.

**Q28. Business and industrial land**

When promoting the role of small scale rural businesses it is necessary to recognise the role of home-based micro businesses, some of which will grow into larger operations and require small commercial premises. It is vital that, when these businesses are located in remote areas, such a move can be made within the locality and provide local employment. Identifying strategic sites is important, but not relevant to this issue. Looking for mixed use in masterplans is important but, again, will not be relevant to isolated areas with low population density.

**Q29 – 33. Crofting**

Highland Council should be cautious in its proposals while crofting legislation emerges. We agree with the protection of prime agricultural land and new classifications would not be helpful. We agree that sub-division is a matter for others to regulate and that reviews should be undertaken before planning consent is given. We agree with the principle of resisting cumulative, sporadic development not necessary for effective crofting.

Policy proposals for inbye land should be developed carefully with crofting bodies including the Crofting Foundation (generally) and Grazings Committees (locally). Policy invention on high will not be helpful to communities already under pressure.

At Q32 we strongly support the proposal for expansion of crofting, because crofting is a key contributor to the special cultural character of the North Highlands, but this should include extending existing townships where Grazings Committees bring a proposal forward. Where new crofting townships would be close to towns, they should not be treated differently, and the question of "what is really a croft" should be left to those regulating crofting. This is already addressed at Q33 and there should be consistency.

**Q34. Aquaculture**

Already covered under the Draft Coastal Development Strategy.

**Q36. Minerals**

Please include our comments under the Draft Coastal Development Strategy.

**Q37 - 38. Outdoor Activities**

Highland Council should work closely with local tourism groups like North Highland Tourism, to support the coordinated and accurate tourism campaigns not being delivered by VisitScotland.

## **Appendix 1**

## **Issues and Threats on Littleferry National Nature Reserve**

The Littleferry Nature Reserve is well described on documents which can be downloaded from the SNH website. There are a number of issues and threats which Highland Council should take into account in its policies, and when working in partnership with SNH.

### **Fungi**

Fungi in the woodland are threatened by collection and drying for sale on a commercial scale. This damages the woodland ecosystem just as much as cockle-gathering and illegal duck shooting does the littoral. The Reserve should be policed and have a resident warden.

### **Research scope**

There is an unusual variety of interesting bumblebees on the reserve. Given their scarcity nationally there is scope for a research study on local species and habitats on the reserve.

### **Potential for guided walks and wildlife events**

Disseminating publicity for these, especially to transient tourists, is presently very difficult. Residents spend a great deal of time explaining the reserve and the ten thousand year history of Littleferry to visitors all the year round, not just in summer. The reserve is a popular spot with residents of south-east Caithness as well as locals. It is very noticeable how many visitors are second and third generation, bringing their children and grandchildren to learn about the wildlife. Capturing this market on guided events would be a good investment for the future. The market provided by the new Golspie Wild Cat trail and new cycle path down Ferry Road leading into the reserve should be more thoroughly exploited. In the Borders, where the Glentress mountain bike trail is highly successful in attracting business to the area, whole families come on holiday although maybe only one or two are mountain bikers.

### **Need for new on-site interpretation**

Signage needs to be placed where visitors will see it. A great many urban visitors don't go beyond the Littleferry car parks, preferring instead to use the pier to watch seals and birds, especially as they have little wildlife knowledge and are commendably anxious about causing damage through ignorance. Boards at the pier would help.

The permanent displays at the car parks have been recently updated and are excellent.

### **Maintenance of paths**

Some smoothing out and improvement of these, such as levelling and filling in the odd rabbit hole, keeps users off the rare and valuable lichen heath and facilitates the progress of those who are mildly disabled. We appreciate that there is a fine line between accessibility and turning the reserve into a park with tarmac paths. The new picnic table path at the car park is excellent. Not all disabled people are in wheelchairs, and the new seating on the

main littoral paths is very much appreciated and much used. Even the wheelchair bound can reach the first seats from the seaward car park and watch the seals, seabirds, ospreys and otters.

The Balblair Wood path is fairly level and it would be excellent if there were similar seats along it to attract those of limited ambulant ability.

### **Education**

Littleferry is visited by groups of both scouts and guides. They are fascinated by the reserve and it is a great shame that their leaders don't book guided tours from reserve managers.

Too few study groups use the reserve for projects. Every local school, and other groups from further afield, should be offered a programme of annual visits to the reserve. The listed Ice House (designed by Telford) would make an excellent Interpretation Centre, especially as it is falling into disrepair through lack of use.

Introducing city children to country and wildlife can change lives, as we have proved elsewhere. The problem is often not with the children, but with reaching and enthusing their teachers and carers. Resources should be devoted to this as it leads to return area visits by whole families and/or subsequent inward migration in adulthood.

### **Management**

Illegal motorcyclists, quad bikers, very low flying military aircraft and kite surfers are a problem as they destroy habitat and in the case of the latter two terrify the seals and birds.

Military pilots currently use charts which do not show the Loch Fleet National Nature Reserve as having any large bird life, despite the presence of large flocks of geese, ospreys and recently a sea eagle. This is not only dangerous to aircrew but in the event of a crash could cause irreparable pollution to the marine reserve.

Jet skiers coming in from the sea are also becoming a problem and are difficult to prevent, and legislation needs to be toughened up in this respect.

It would be excellent if SNH could work with Highland Council to improve signage at the seaward car park

- discouraging swimming and inflatable beach equipment because of dangerous currents
- forbidding the riding of bikes of any sort on the lichen heath, since those who do this say with justification that there isn't any sign telling them not to.

### **Proposed Dornoch Firth Rail Link and Littleferry**

This scheme would destroy much of the Nature Reserve, and is discussed further in Appendix 3.

## APPENDIX 2

## Submission by Laid Common Grazings Committee

We have just received a copy of the Consultative Draft of the Highland Coastal Development Strategy dated 28<sup>th</sup> August. Our attention was drawn to this document only coincidentally and we were further surprised to find that we would normally have had to purchase it. Thank you for the copy provided to us free of charge.

The relevant passages - as far as we could see from the restricted time we have had - and in particular para 5.7.1 were discussed at the Grazings Committee last night and I have been asked to make the following comments.

As you can imagine, we are angered by the continued reference in Section 5.7.1 to the Loch Eriboll superquarry - "Sites for large coastal quarries have been proposed in the past ..... on the west side of Loch Eriboll, but have not thus far been developed".

We are dismayed that, by mentioning it thus, you are still trying to keep this project alive despite - and here we are only repeating once more what we have been saying to you for some ten years or so - the totally negative conclusions of your own £50,000 Durness Coastal Quarry Study in 1994 which were accepted by Highland Council Planning Committee at a meeting on 20<sup>th</sup> April 1994.

Amongst the totally negative conclusions was the recommendation "that no further consideration should be given to the development of any of the rock resources at Durness". This report has been ignored by your services over the years as if it just did not exist and here we go again in August 2009 with the Loch Eriboll site having been "proposed ..... but not yet developed" with no caveat that it had been totally ruled out by your own study - and a sort of implication that it is just waiting for a developer to come along.

We object in the strongest possible terms to this and ask for the reference to Loch Eriboll to be removed. Or at least there should be the caveat that your own study has rejected it. And this caveat should not be in the terms that you usually use that there are a few objections of the Report to be overcome. It should make it clear that the proposal was unequivocally and comprehensively rejected on the grounds of insufficient reserves of questionable quality rock and on economic, social and environmental grounds.

There is also an inconsistency in the first sentence of Section 5.7.1 where it is said "Quarries can ..... provide .... much-needed resources for roads and building work".

Contrast this with the (clearly correct in our opinion) statement in the Minerals section of the Highland Wide Development Plan that "There are unlikely to be deficiencies in supply within the period of this Plan".

Also you will see that in our submission to the Highland wide Local Development Plan we completely agree with your Section 5.6 on the need to encourage Inshore Fishing and shell fish farming such as we have in Loch Eriboll. This again is completely inconsistent with a superquarry with its high volume of shipping whatever folk may try and prove about clean ballast water etc.

And this is really where the accent should be put - sustaining existing and developing new kinds of Inshore Fishing and aquaculture. You will remember that we deplored the absence of a quantified framework for present and suggestions for future aquaculture in the Loch Eriboll Aquaculture Framework Plan. And here we would hope that Loch Eriboll would not be included in the "national policy presumption against further aquaculture development on the north and east coasts" (Section 5.5.3). This is where the diversity of employment and new development potential lie in coastal development.

As you say in Section 1.2 "the main planning challenge here is to sustain the viability of key settlements and encourage diversification in the local economy" - and encouragement of Inshore Fishing and an aquaculture framework, particularly with relation to future developments, should be key elements in this challenge. But not trying to keep the Loch Eriboll superquarry alive since this would purely and simply wipe out Laid.

Yours sincerely,

### **APPENDIX 3 - Commentary on Unsustainable Dornoch Firth Rail Link Proposal**

This proposal was initially produced for a lobby group. Dornoch Firth Rail Action Group aim to keep the proposal alive despite its rejection as not credible by Hi Trans following analysis by independent consulting engineers which recommended against the proposal. The project failed Transport Scotland's "Scottish Transport Appraisal Guidance" (STAG) test and does not currently feature in the National Rail Strategy.

#### **Contravention of Scottish Government Planning Policy on Flood Risk**

This proposal contravenes Scottish Planning Policy PAN 69 which expressly prevents development which would have a significant probability of being affected by flooding. It follows, therefore that the proposal would not meet with requirements laid out in Sections 5.13.2/3/4 of the Coastal Development Strategy document.

The Scottish Environment Protection Agency (SEPA) Indicative Flood Map ([www.sepa.org.uk](http://www.sepa.org.uk)) shows seven points of probable inundation by the sea on the proposed line between Glenmorangie and Golspie Station.

- Between Glenmorangie and Dornoch Firth Bridge
- South approach to Dornoch Firth Bridge (A9)
- North approach to Dornoch Firth Bridge (A9)
- Between Lonemore and Eaglefield east of Cuthill Links, Dornoch
- Coul Links south of Littleferry, submerging sand dunes and pylon
- Littleferry Pier and along the coast northwards, submerging the point and pylon
- Fleet Ford, Littleferry (will cover road)

The SEPA Flood Map does not take account of climate change, which would be expected to increase both the risk of inundation, and the number of points at which it might occur. SNH, in its response to the Draft Coastal Development Strategy, points out that Sniffer (2008) A Scoping Review of Coastal Flooding, identifies the Inner Moray Firth as being at higher risk from the combined effects of coastal flooding (including sea level rise, surges and wave energy) than the remainder of the Highland coastline, and than previously thought to be the case.

It should also be noted that there are points on the line through the rest of East Sutherland where inundation by the sea is also a significant probability.:

- North east of Clynemilton
- Below West Garty
- East and West of Portgower.

Elsewhere, at Dornoch for example, a very high water table already requires costly specialist drainage for most developments south of the town. The rail embankment would be likely to have a collateral impact on the surrounding areas, including housing. Note, for example, the flooding which occurred at the proposed junction point of the two lines south of Golspie Station on October 26 2006. This was actually caused by the railway embankment which prevented flood water from heavy rain draining away. Consideration

should also be given to the additional potential for flooding at the exit point from the proposed tunnel under Rowan Crescent and Rowan Avenue..

In the list above, we have not included the points of river flooding shown on the map as these would require individual flood prevention measures, for both the new and the existing line.

## **Destruction of Internationally Protected Environments**

### **Destruction of RAMSAR and Natura 2000 Protected Landscape**

Construction of a line on this route would have to include significant flood defence works, drainage and pumping stations and be raised to a considerable extent above present land level in an area delineated as of International Importance for its Natural, Built and Cultural Heritage in the HWLDP Main Issues Report (page 44).

The substratum of the Dornoch and Golspie coastal area is a Raddery formation, a constantly shifting mixture of sand and gravel and raised beaches with no solid base, highly vulnerable to undermining by the sea (which is why the reactor originally proposed for Littleferry finished up at Dounreay).

The line would be visually most intrusive in an area of Special landscape Value, Natura 2000 and RAMSAR designation. SNH states that consideration should be given to the visual landscape of the coast especially as experienced from the sea. The railway, if built, would be intrusive in its impact on the coastline from Tain to Golspie.

Construction of the line would cause enormous and irreversible environmental damage to the RAMSAR and Natura 2000 sites through which the proposed line passes, and over a wider corridor than that required for the track itself. Apart from the destruction caused by the construction works, site offices, storage, vehicle parking and turning bays, it is not possible to bring modern heavy piling and construction equipment and materials to the site down single track roads (both at Dornoch and Golspie) without serious collateral damage. Local conditions rule out transport by sea.

Round Dornoch a very high water table already requires costly specialist drainage for most developments south of the town. The rail embankment would undoubtedly affect this and have a deleterious effect on the water table of the Natura 2000 site and similarly affect the RAMSAR areas either side of the Dornoch Firth Road Bridge on the A9.

### **Destruction of National Nature Reserve**

Sited on a narrow peninsula surrounded by the sea, Littleferry is part of the Loch Fleet NNR, which is of national and international importance. At present all development requires a planning condition that no materials or equipment or vehicles will be placed on the Reserve because of the fragility of the ecosystem. Because the Littleferry peninsula is a long and comparatively thin piece of land, the wide swathe of damage caused by railway construction would affect every part of it, and most of the damage would be irreparable.

- Implications for crossing the Fleet

The scheme for crossing the Fleet would require very sturdy piling by specialists (Raddery formation). Taking this together with the inundation which is already occurring on both sides of the channel, the implication is that the bridge crossing of the Fleet at Littleferry would also have to be considerably longer than the 250m envisaged, higher, more expensive and more intrusive. Construction would be deleterious to the rare seals mentioned in the Draft Coastal Development Strategy.

- Implications for the peninsula as whole

Construction of the line and bridge at Littleferry would cause widespread environmental damage. Building a railway impacts on a strip much wider than the land required for the track, and this would run over the rare lichen heath, through the Littleferry Wood, straight through a working croft, through Balblair Wood and over the southern end of Golspie Golf Course (also obliterating access to Golspie Kart Track and the Caravan Park.)

Among flora and fauna affected would be the lichen heath with its very many varieties of rare lichen, the homes of otters, ospreys, wildcats and Kellas cats, Scottish Crossbills, Crested Tits, several species of bumblebee, rare butterflies and numerous rare flowers.

- Loss of public access to the Reserve

The proposed route would destroy not just the car parks and facilities located there, but would cut off all access to the seaward part the Reserve from the only road. Also lost would be the very popular, specially constructed disabled access and seating. There are few places in Scotland where the wheelchair bound can easily watch seals, ospreys and rare wintering wildfowl.

It would also cut off access to the existing 3 mile coastal footpath from Golspie to Littleferry, which would be incorporated into the proposed Moray Firth Coastal Path. (see also our comments on Section 6.1 of the Draft Coastal Development Strategy)

- Damage to archaeology and built environment

Archaeological sites at Littleferry have also been very much neglected in the proposal. It is not always appreciated that Littleferry peninsula has been inhabited for ten thousand years and is a rich archaeological resource.

All building work on or adjacent to the Reserve requires an archaeological survey and the attendance of qualified archaeologists on site.

Finds have included stone artefacts, kist tombs and Pictish carvings, Jacobite remains from the 1746 battle of Littleferry on the eve of Culloden and its associated sea battle;

tumuli, graves dated to the 12th century, a 16th century giral, an ice house and marine works by Thomas Telford, and a nineteenth century weighbridge. It is currently hoped to improve interpretation of this built environment which attracts many visitors. Littleferry is therefore of great economic value to East Sutherland.

There are not many small places in Scotland where the visitor can easily view so much history all within a short walk. We strongly support the proposal in the Draft Coastal Development Strategy to promote this, but it should be noted that the Dornoch Firth Rail Link proposal would destroy what is a very popular, though underdeveloped, tourist attraction.

## **Detriment to the Economy of Sutherland**

### **Loss of rail access to communities in West and North West Sutherland**

It is simplistic in the extreme to justify the replacement of the Lairg loop with a new line across Dornoch Firth and the Fleet, by saying it would be of benefit to the part of the county occupied by 60% of the population.

Sections 2.4/5 of the Draft Transport Strategy state: "There are a number of features of Highland which create problems and challenges in terms of transport meeting wider needs. Many of these issues experienced in Highland are not typical in the rest of Scotland and therefore there is a greater challenge in meeting wider aspirations. Rural and remote communities are experiencing a declining population, partly due to lack of local employment opportunities, *but also the difficulty in connecting to other areas.*"

Removing rail access from those areas of Sutherland already categorised as "fragile" will only serve to increase their fragility.

The east and west of the county are strongly interrelated and should not be treated as separate populations to facilitate a PR campaign for a particular rail project.

The rail link would only be of benefit to Golspie, Brora and Helmsdale if all trains stopped there. With the addition of a new station at Dornoch, Caithness trains could only achieve time savings quoted in lobbyists' rhetoric by **not** stopping at the other East Sutherland stations.

### **Damage to tourism**

In our comments on Section 5.10 of the Draft Coastal Development Strategy we have stressed the importance of Littleferry Nature Reserve to the local economy. We note that this is supported in the SNH submission on the Draft Coastal Development Strategy. The rail proposal would effectively destroy much of the Reserve as an accessible tourist destination and local economic asset.

An estimated 10,000 visitors a year from all over the world come to Littleferry (official figures were 8,000 in 2004-5 and visitor numbers have increased considerably since then).

This is despite very little promotion and few visitor facilities, with more people than ever arriving on foot or by bike using the new path provided by Highland Council, and many staying and spending money vital to the local economy.

Many visitors stay in Golspie and the surrounding locality, whose economy would be directly harmed. However a good proportion of these visitors stay in other places in Sutherland, Easter Ross and over the border in Caithness. We draw attention to our comments on Table 6.1, pages 32-33 of the Draft Coastal Development Strategy which stresses the economic importance of linking archaeological sites, wildlife watching and our coastal paths. It states that key research sites around Loch Fleet should be promoted to a wider audience. It is vital therefore to preserve the Loch Fleet NNR intact.

The proposal by local schoolchildren working with Highland Council's Countryside Ranger at Dornoch Links, currently being progressed with the support of Dornoch Community Association is a good example of what is suggested.

In its response to the Draft Coastal Development Strategy SNH states that consideration should be given to the visual landscape of the coast especially as experienced from the sea, because of its importance to seaborne tourism. The railway, if built, would be intrusive in its impact on the coastline from Tain to Golspie.

### **Destruction of working croft and land**

The proposal would completely destroy a croft house, buildings and land which has been in the same family for nearly 150 years, the building itself having been there since at least 1776. There are nearly a thousand families on the waiting list for crofts.

### **Availability of viable alternatives**

#### **Passenger traffic**

Dornoch already has a fast, limited stop bus service, 25X, which reaches Inverness more quickly than would an updated railway. This would continue to be used by holders of concession cards who would hardly be likely to pay for a rail ticket when they could take a faster bus for free.

Draft Transport Strategy proposals include better connection between buses and trains. Two years ago we proposed to Hi Trans that if need for better rail access for Dornoch could be proven, it could be achieved immediately by public subsidy of the small business start up and running of a shuttle bus from Dornoch to the railhead at Tain. We have been previously involved in the provision of such a service which has now been successfully operating for 15 years, and now runs free of subsidy.

It should be noted that Dornoch Youth Group have already succeeded with representations to Stagecoach, resulting in buses now meeting the last train at Tain. Such schemes are affordable at a time of severe funding restrictions and can be speedily implemented.

Consideration should also be given to ways of encouraging an express non-stop bus service between Caithness and Inverness which would appeal to bus pass holders who are unlikely to pay extra for a train ticket. In response to complaints from current bus passengers, it would be fair to expect a greatly improved quality of vehicle at the same time.

**Freight traffic**

The HWLDP Main Issues Report suggests Improvements to the Far North Line including transport of more freight on rail. At present less freight is carried on rail than in 2003/4. Funding small improvements to the line such as passing loops and shorter sections, and reinstating freight transfer facilities would take lorries off the A9, improving quality of life in Golspie and Brora. Rail freight is not time pressured and can be carried at night. Expenditure on maintenance and replacement of the present line needs to be stepped up to enable the carriage of heavier containers.

**END OF DOCUMENT**

