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Issue 06: Environment and Heritage

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Amelia Walker (931321)

Bill Badger (967160)

Caithness Chamber of Commerce (983321)

David Doohan (980228)

Ian Walker (979716)

Wick Harbour Authority (980257)

Wildland Limited (983561)

Wind Prospect Ltd (971514)

3. Relevant Council's Supporting Documents

CD04: CaSPlan Main Issues Report, Oct 2014

CD18: Highland-wide Local Development Plan, Apr 2012

CD45: Assessment of Highland Special Landscape Areas, Jun 2011

CD46: Caithness and Sutherland Landscape Character Assessment, 1998

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| Issue 6 | ENVIRONMENT AND HERITAGE | |
| Development plan reference: | Environment and Heritage pages 18- 21 | Reporter: |
| Body or person(s) submitting a representation raising the issue (including reference number): | | |
| <p>Amelia Walker (931321) Bill Badger (967160) Caithness Chamber of Commerce (983321) David Doohan (980228) Ian Walker (979716) Wick Harbour Authority (980257) Wildland Limited (983561) Wind Prospect Ltd (971514)</p> | | |
| Provision of the development plan to which the issue relates: | Environment and Heritage section (paragraphs 70 to 85), including Special Landscape Areas information. | |
| Planning authority's summary of the representation(s): | | |
| <p>Environment and Heritage – General</p> <p><u>Amelia Walker (931321)</u> Supports this section of the plan. In particular feels that the natural and cultural heritage is at the forefront in Thurso when approaching from the west and should be left undisturbed.</p> <p><u>Caithness Chamber of Commerce (983321)</u> Has no specific comment on this section of the plan.</p> <p><u>Bill Badger (967160)</u> Supports this section of the plan. The environment should be celebrated and safeguarded and not put at risk by indiscriminate windfarm development. Tourism is compromised by poorly thought out development.</p> <p><u>Ian Walker (979716)</u> Environment and heritage has been protected by the strength of the current Thurso Local Plan. Open vistas, historic areas including Pennyland House and the B Listed Smith Memorial are in jeopardy from a development which would destroy the environment and heritage of Thurso West.</p> <p><u>Wildland Limited (983561)</u> Would like Kyle of Tongue National Scenic Area extended or at the least for the Council to advocate a formal Landscape Assessment carried out by SNH, with a view to designation at the LDP. Supports the western extension of the Eriboll East and Whiten Head Special Landscape Area. The Special Landscape Area overlaps/coincides with two areas of 'Coastal Zone' – one being isolated coast around the A'Mhoine Peninsula and the other being undeveloped coast along the margins of Loch Eriboll and the Kyle itself, reflecting the scattered crofting and fishing communities along those parts of the coast. These designations all overlap with SPA, Ramsar, SAC, NNR and SSSI designations over much of this same area of land. Notes the recent addition of Wild Land Areas. Would like to</p> | | |

extend Wild Land Area 35 to cover the whole of the A'Mhoine Peninsula. The A'Mhoine might be the foreground between Hope and Loyal and the sea, but it is only when the reverse view is considered from the Pentland Firth that the true scale of the grandeur can be fully assessed. The A'Mhoine peninsula is the second longest area of mainland Scotland without a road, only exceeded by Knoydart. Would like to see the extension of the Cape Wrath Way explored by the Council and HIE. Notes the North Coast 500 and the benefit it has in terms of rural development and tourism in the plan area.

Conservation Areas

Wick Harbour Authority (980257)

Would like clarity on what the review of the Wick Pultneytown Conservation Area would involve.

Climate Change

Wind Prospect Ltd (971514)

Paragraph 81 should further acknowledge that new onshore wind and hydro energy developments will also be emerging between now and 2025.

SLAs

Ian Walker (979716)

With the amount of coast from Kinlochbervie to John O'Groats already under the umbrella of SLAs, it would be logical to include the whole of the coastline, including Thurso and Murkle Bays as Caithness has already been described as having a unique coastal character. Would also like to see the areas TS04 and TS12&14 considered as Special Landscape Areas.

David Doohan (980228)

The area viewed from Scrabster Hill east over the panoramic area to Dunnet Head should be a Special Landscape Area as it is a better vista than some areas already covered by the designation.

Amelia Walker (931321)

The area between Melvich and Dunnet Head should be designated as a Special Landscape Area as the scenic value is as good if not better than areas already designated. In your production for the plan, at page 100, the definition of open space is as follows: "areas of high quality, accessible and fit for purpose open space. These areas are protected from inappropriate development consistent with the HwLDP Policies 75 and 76." These should be advanced to the Thurso Bay area.

Bill Badger (967160)

Generally in agreement with the approach to Special Landscape Areas, however they are limited in size and by their existence appear to give the green light to inappropriate development in the much larger areas that are not designated as Special Landscape Areas. The Council should take all impacts into consideration both within and outwith Special Landscape Areas.

Modifications sought by those submitting representations:

Environment and Heritage – General

Wildland Limited (983561)

Extend Kyle of Tongue NSA.

Extend Wildland Area 35 to cover all of A'Mhoine Peninsula.

Commit to exploring the extension of the Cape Wrath Way (assumption of linking it with North Highland Way).

Climate Change

Wind Prospect Ltd (971514)

Amend paragraph 81 to acknowledge that new onshore wind and hydro energy developments will also be emerging.

SLAs

Ian Walker (979716)

Designate entire coastline from Kinlochbervie to John O'Groats as an SLA.

Areas originally numbered TS04 and TS12& should be SLAs.

David Doohan (980228)

Designate the area from Scrabster Hill east over to Dunnet Head as a Special Landscape Area.

Amelia Walker (931321)

Designate the area between Melvich and Dunnet Head as a Special Landscape Area.

Designate land at Thurso Bay as Open Space.

Summary of responses (including reasons) by planning authority:

Environment and Heritage – General

The general support for this section from a number of the representees is noted.

The Council assumes that Caithness Chamber of Commerce is content with this section of the plan.

Issues surrounding potential adverse impact on the environment and cultural heritage from development at Thurso West are being considered in the Schedule 4 for Thurso West.

The responsibility to designate (or extend) an NSA lies with Scottish Ministers, therefore the Council will not be extending Kyle of Tongue NSA through this plan. The Council does not think it is necessary to ask SNH to carry out a formal landscape assessment; the NSA and SLA and Wild Land Area identification processes all involved extensive landscape assessment. SNH has already produced Landscape Character Assessments covering all areas. Landscape is also afforded policy protection through Policy 61 Landscape in the Highland-wide Local Development Plan (HwLDP) (CD18) which states that new developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character Assessment of the area in which they are proposed. Therefore the Council feels there has already been sufficient landscape assessment carried out. No modification is proposed by the Council.

The support for the western extension of the Eriboll East and Whiten Head SLA is noted.

SNH prepared a map of Wild Land Areas in 2014 and it is not within the power of the Council to amend or alter these areas. No modification is proposed by the Council.

Cape Wrath Trail is an unofficial, unmarked long distance route. The suggestion for the Council and HIE to explore the idea of extending it i.e. linking it to the North Highland Way, has been passed to the Council's Access Officer. The following website <http://www.outdoorhighlands.co.uk/long-distance-trails/> is used by the Council's Rangers to promote both the North Highland Way and the Cape Wrath Trail.

Conservation Areas

In relation to the query from Wick Harbour Authority about Wick Pultneytown Conservation Area, it is the statutory duty of Highland Council to determine which parts of their area are of special historical or architectural interest and designate such areas as conservation areas. Wick Pultneytown Conservation Area has its own unique character. Careful and controlled management of the Conservation Area is essential to ensure that the special character is protected. Ongoing and continued monitoring and review of conservation areas is essential and allows for the formulation of enhancement schemes and may from time to time result in amendments to boundaries. Paragraph 75 sets out that appraisals may be undertaken for Conservation Areas and Management Plans prepared. Details of when this may happen for Wick Pultneytown Conservation Area are not available as the work is not yet programmed, but there will be public consultation during any review.

Climate Change

Paragraph 81 is acknowledging that onshore wind and hydro are well established in the area and that offshore and marine energy developments are emerging. Paragraph 79 also states that the Council is committed to maximising renewable energy contributions. Therefore the Council does not feel that it is necessary to add extra wording into paragraph 81 saying that new onshore wind and hydro energy developments will also emerge between now and 2025. However, if the Reporter is so minded, the Council would be agreeable to the following amendment: "with many onshore wind and hydro energy developments well established" being amended to: "with onshore wind and hydro energy sectors well established".

SLAs

The reference to the definition for open space on page 100 of the Plan, however, we take it that this is in reference to the 'open space' definition within the Glossary (which is now page 126 in the Modified Proposed Plan). The open space definition quoted, apart from one minor wording difference, is the same as the definition provided in the Glossary alongside the Main Issues Report (MIR) (CD04). It should be noted that the Proposed Plan had a different definition for Open Space and that has been carried forward to the Modified Proposed Plan. The representee wishes to see an Open Space allocation for land at Thurso Bay. The Proposed Plan Thurso map shows existing greenspaces around Thurso Bay to be safeguarded (see "greenspace" definition in the glossary). If the public park proposal were to be delivered then it would qualify for Greenspace/Open Space safeguard. Blanket "no development" across a wider area is not appropriate. No modification is

proposed by the Council.

Support for the western extension of the Eriboll East and Whiten Head SLA is noted above, under “Environment and Heritage – General”. SLAs are regionally valuable landscapes identified to protect and enhance landscape qualities and promote their enjoyment. Sites identified in the MIR as TS06 and TS18 and as TS04 and TS12&14 respectively in the Proposed Plan, are both pieces of land within the SDA for Thurso. It would therefore not be appropriate to designate individual pieces of land within a settlement as SLAs. The areas in between SLAs do not give a green light to inappropriate development. In many instances land around (and within) SLAs is covered by other designations. Even if land is not covered by a designation, all development proposals are assessed against the policies in the HwLDP (CD18), including consideration of any impact of development on any nearby SLAs. There have however been suggestions for some new SLAs and for the whole of the coast from Kinlochbervie to John O’Groats to be an SLA. The consultation on the SLAs through the CaSPlan MIR (CD04) was concerned with “fine-tuning” of boundaries - relatively minor adjustments to boundaries of existing SLAs to ensure they enclose areas of similar landscape and/or to ensure that the boundary did not inadvertently sever a landscape feature, having regard to the SLA Citations (CD45) and SNH’s Caithness and Sutherland Landscape Character Assessment (CD46). The consultation was not aimed at identifying new SLAs. The original methodology used for SLAs selection/identification was challenged through Highland-wide Local Development Plan (HwLDP) Examination and the Reporter supported the current SLAs, subject to the Council considering any boundary amendments through the Area Local Development Plans. This was the approach followed by the Inner Moray Firth Local Development Plan (adopted July 2015) and it was accepted by the Reporter during its Examination process. It would be a significant piece of work to re-evaluate SLAs across Highland and possibly identify new criteria and scoring for their identification. Having considered the above the Council is happy with the boundaries of the existing SLAs and the conclusions of the HwLDP Examination on this issue. Therefore the Council considers that there should be no new SLAs identified in this Plan.

Reporter’s conclusions:

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Reporter’s recommendations:

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