

## Issue 11: Thurso Site TS04 'Thurso West'

1. Schedule 4
2. Representations

### **Proposed Plan:**

Agnes Macdonald (980230)  
Alan Loomes (980235)  
Alan Ritchie (980220)  
Alastair Chisholm Christie (980596)  
Amanda Gunn (980290)  
Amanda Robertson (983266)  
Amelia Walker (931321)  
Andrew Bremner (980248)  
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Dean Craig (980100)  
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Eilidh Paterson (980233)  
Elizabeth Mackay (983255)  
Emma Budge (980201)  
Emma Gunn (979970)  
Euan Sinclair (980244)  
Fiona Doohan (980015)  
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Gary Angus (980227)  
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Michael Bowden (980202)  
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Nick Russel (979216)  
Pennyland House B&B (971783)  
Phyllis Nicol (980599)  
Rebecca Paterson (979904)  
Robert Falconer (980046)  
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Scottish Government (963027)  
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Sean Miller (980259)  
SEPA (906306)  
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Timothy Ridgley (979979)  
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Walter Mclachlan (979426)  
William Marshall (941627)

Jason Ridgley (980223)  
Jean Alexander (981921)  
John and Helen Barkham (981629)

William Walker (979718)  
Willie Steven (980239)

**Modified Proposed Plan:**

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Abbey Sutherland (MPP1033845)  
Abbie Wilson (MPP1032650)  
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Helen Robbie (MPP1032179)  
Herbert Lawson (MPP1034148)  
Iain Elder (MPP1032459)  
Ian Cannop (MPP1032993)  
Ian Westmorland (MPP1031981)  
Jacqueline Ridgley (MPP930800)  
Jade Baikie (MPP1033831)  
James Henderson (jnr)  
(MPP1033475)  
James Henderson (MPP1033472)

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Michael Cowie (MPP1032425)  
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Nicky Cowie (MPP1034161)  
Nicola Arthur (MPP1034246)  
Pennyland House B&B (MPP971783)  
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Ryan Cameron (MPP1034708)  
Samantha Angus (MPP1034517)  
Sandra Isabelle Harris  
(MPP1034546)  
Sean Miller (MPP1033482)  
Sharon Smith (MPP1034572)  
St Clair Hotel (MPP980003)  
Steven MacDonald (MPP1032713)  
Steven Reid (MPP1032948)  
Tanya Sutherland (MPP979994)  
The Pentland Hotel (MPP979985)  
Thomas Watters (MPP1034436)  
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Timothy Ridgley (MPP979979)  
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William James Stewart

Jan Mackay (MPP1032499)  
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(MPP1034252)  
William Steven (MPP1033802)  
William Walker (MPP979718)  
Yasemin Turanli (MPP1033545)

### 3. Relevant Council's Supporting Documents

CD01: Scottish Planning Policy, Jun 2014  
CD02: National Planning Framework 3, Jun 2014  
CD04: CaSPlan Main Issues Report, Oct 2014  
CD09: Habitat Regulations Appraisal Record, Aug 2016  
CD17: Caithness Local Plan, Sept 2002 (as continued in force, 2012)  
CD18: Highland-wide Local Development Plan, Apr 2012  
CD23: Thurso Western Expansion Area Development Brief, Jun 2003  
CD25: Wick and Thurso Charrette Report, May 2013

<b>Issue 11</b>	<b>THURSO Site TS04</b>	
<b>Development plan reference:</b>	Thurso - TS04 Thurso West page 37	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<b><u>Proposed Plan:</u></b>		
Agnes Macdonald (980230)	John Faulds (983248)	
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 Yasemin Turanli (MPP1033545)

**Provision of the development plan to which the issue relates:**

Thurso West distributor/relief road and TS04  
*\* Please note that this part of the Proposed Plan was subject to non notifiable modifications including the removal of reference to sites TS12 and TS14 from the site table TS04 and correcting the Indicative Housing Capacity figure for TS04 from 180 to 200.*

**Planning authority's summary of the representation(s):**

**Representation to the Proposed Plan (January 2016):**

The Pentland Hotel (979985), Ian Walker (979716), Amelia Walker (931321), Donald Mackay (981995), Elizabeth Mackay (983255)

The main company employed to draw up the MIR and facilitate the Charrettes on behalf of the council is then the company subsequently employed by the landowner at area TS14 to draw up the plans and proposals for the Hotel on this site - is this a conflict of interest.

**Thurso West distributor/relief road**

Scottish Government (963027)

Objects to Thurso - Settlement Statement Text and Map. The Settlement Statement Map for Thurso includes indicative lines for potential routes and road connections with the A9 trunk road. However, there is no information on the appraisal and rationale for the new

links and neither are there details on funding, phasing or delivery provided in the Plan. The Plan and accompanying Action Programme do not give a clear understanding of what is required to provide access to the new development areas, what is being suggested to alleviate the issues highlighted in the town centre or what steps will be taken to better understand the options. The indication of potential routes and the policy protecting land at this early stage of considering options are therefore considered to be premature and does not accord with SPP paragraphs 274 / 275. Modifications Sought: Transport Scotland advises that the need for any alternative routes around Thurso connecting with the trunk road should be established through a robust appraisal exercise. This position was previously stated in response to the Main Issues Report consultation. This type of appraisal would assess all modes of travel as part of an objective led approach. The identification of transport interventions should result from the assessment of evidence based transport problems and opportunities of a specific area. A range of transport alternatives should be considered and not focussed on a particular solution.

Stuart Liddle (980236)

The provision of a bypass route to Scrabster is laudable, but should not impinge upon the existing built up areas of the town, as this would only move potential areas of congestion and HGV traffic to closer proximity to schools, hospital and college.

John and Helen Barkham (981629)

Objects to the inclusion of the Thurso West Distributor/Relief Road because it is not needed. During the construction and operation of Dounreay and Vulcan the road network has coped and the decommissioning of Dounreay has resulted in and will continue to see a decrease in traffic through the town. Harbour related traffic would not use a bypass. A bypass has the potential to remove vital tourist footfall from the town centre. The topography of the proposed bypass from Provost Cormack Drive is unsuitable as it will create a blind summit, close to existing junctions, which faces due south into the midday sun.

Jane Telfer (979224)

The proposed distributor road should be situated west of its designated route to avoid crossing through the community woodland as marked on the plan due to health and safety issues and expected high traffic levels. The proposed site access road runs past the Ormlie Community Playpark, and this will impact on the safety of children, especially if the proposed distribution road is not implemented. Since the purpose of the bypass is to remove traffic from the centre of the town, where is the forward thinking in proposing a bypass that encircles the town on two of its available sides, severely restricting any further expansion of the town. This would lead to there being a further need for a new bypass when this current new bypass has become absorbed into the town. Finally as the bypass requires a new bridge to be built over the river the fact that access to the A9 can be achieved without the need for a bridge, this would appear to be an extravagance in a time of austerity.

Alastair Chisholm Christie (980596), Janetta Christie (975843)

Para 114, A by-pass has been promised for years. It should now be a priority as the roads in town can no longer cope with the heavy traffic passing regularly through the town.

Kenneth Nicol (977530), Jacqueline Ridgley (930800)

Para 114 states that there is opportunity for a relief road to be created. However this is

misleading as the Council is not in a financial position to deliver it.

### **TS04 Thurso West**

Gary Parker (968625), William Marshall (941627), Hamish Robertson (979473), Lee Parnell (979688), Colin Paterson (979739), Sheila Finlayson (979790), Jane Telfer (979224), Kenneth Nicol (977530), Jacqueline Ridgley (930800), Timothy Ridgley (979979), Anthony Ridgley (979975), The Pentland Hotel (979985), Tanya Sutherland (979994), Walter Mclachlan (979426), William Walker (979718), Ian Walker (979716), Linsey MacDougall (980035), David Doohan (980228), Stuart Andrew (980221), Gary Angus (980227), Alan Loomes (980235), Amelia Walker (931321), Gayle Rennie (980274), Lee MacDougall (980312), Jane Foster (980307), Agnes Macdonald (980230), Margaret Smedley (930596), Stuart Vines (967328), St Clair Hotel (980003), Stephen Beckett (980229), David Lord (1069719), Jason Ridgley (980223), Janetta Christie (975843), Cecilia Brands (979454), Karen McLean (979677), Kirsten Murray (979696), Sheena Mclachlan (960835), Michelle Fraser (979884), Donna Flowerday (979953), Michael Bowden (980202), Robert Falconer (980046), Stuart Liddle (980236), Phyllis Nicol (980599), Tom Jackson (981229), John and Helen Barkham (981629), Louise Smith-Dasar (981718), Jean Alexander (981921), Donald Mackay (981995), Carol Murray (983145), Ms Kathleen Faulds (983151), Isabel Kay (983245), John Faulds (983248), Lindsay Kay (983250), Elizabeth Mackay (983255), Amanda Robertson (983266), Stephen Anderson (983269), Lyndall Leet (983272), Cynthia Calder (980214), Danny Calder (983991), Andrew Fraser (983996), Fiona Doohan (980015).

Objects to the inclusion of TS04 for one or more of the following reasons:

#### Housing

- Since the plan for the western expansion of Thurso was first put forward in the 1990s the case for such proposals has weakened significantly including the economic arguments, demographic projections and infrastructure requirements.
- There is no demand for the level of housing development being allocated for. The HNDA shows that housing demand in Caithness and Sutherland is at a negligible level. There is also very little demand for affordable/ council houses in Thurso and the waiting list for them is very short. There are already a large number of empty and vacant houses available. Many houses stay on the market for long periods of time. House prices are already some of the lowest in the Highlands, approximately 60% of similar houses in Inverness.
- Demographic changes show that there is no need for further major housing development in Thurso. The latest census shows there has been a declining and ageing population in Thurso (4% decline between 1991 and 2011 and a 0.9% fall between 2001 and 2011 which is the 3<sup>rd</sup> highest rate of decline in Highland). Young people are moving away from the area and the school roll is declining (the High School roll declined 18% since 2009/10 and it is expected to decline a further 14% by 2020). The Council's Ward Information identifies that there is a low supply of new housing being built in Thurso and the overall supply is adequate. With the expected demographic changes this is likely to remain the same.
- All the new housing required could be accommodated on brownfield sites or on housing sites TS01, TS02 or TS03 instead of TS04.
- The allocation of housing land west of Pennyland House and a commercial

allocation east of the business park would leave a gap site which would provide opportunity for complete discretion by the developer.

- Questions the reasons for reducing the number of houses located on land between High Ormlie and the Business Park by 50% but that a new allocation is identified for 20 houses to the west of Pennyland House.
- Housing development west of Pennyland House would not be viable after the necessary investment in services.
- The previous planning permission for 400 houses has expired which shows there is no real demand for more housing. Council figures show that there were only 170 houses built in Thurso between 2006 and 2010. The housing figures show that the majority of new housing is in Landward Caithness meaning people are choosing/wishing to live in the countryside, not in the main towns. Based on the Council's report from Feb 2014 only 95 houses are needed in Thurso. These could be located in other, more suitable sites than the proposed allocations alongside the A9 at Pennyland.

#### Economic Issues

- The economy is expected to decline due to the decommissioning of Dounreay and Vulcan facilities which will see the loss of hundreds of jobs. Marine renewables is put forward as driving growth in Caithness in the future but there has been a lack of progress in the industry. All the tidal companies have gone out of business or withdrawn their interest in the area. Marine renewables will not be a labour intensive industry and will provide little new employment opportunities. Any new employment opportunities from the marine renewables sector will be focused on Wick. With the dramatic fall in oil prices the oil and gas industry is shrinking.
- Another filling station is not needed in the town. There are already 3 in Thurso including one on the NC500 route. Another filling station would not be financially viable and would likely force one of the existing ones out of business. Two of the town's filling stations were recently for sale with the one at Pennyland being on the market for a very long period before it was bought by Lidl and cleared as part of their store expansion.
- A large proportion of the previous filling station customers were going to and from the harbour and therefore the siting of the proposed filling station would be against the flow of traffic. This would create unnecessary traffic issues, particularly during peak traffic times from Dounreay/Vulcan and ferry arrivals. The proposed location of the filling station would result in a higher risk of hydrocarbon pollution in the soil.
- A vacant site sits opposite TS04, next to the Weigh Inn, which was the location of the former garage. This site should be redeveloped instead of a greenfield site adjoining it being developed. A better location for an additional filling station would be on the A9 on the east of the river (assumed).
- Commercial development should be focused on existing business parks or the identified Enterprise Area at Scrabster.
- There are already too many built up housing developments in Thurso which have resulted in the emergence of particular social problems. Development of TS04 would have adverse social impacts for the town.
- Without regeneration of the town centre it would result in a doughnut effect, with activity around the periphery and nothing in the middle.
- The existing Caithness Local Plan (2002) currently provides opportunity for commercial development related to the renovation of the B-Listed steading.



### Planning history

- There have been strong objections to developing the site for almost two decades. Previous Public Local Inquiries of 1994, 2001 (as part of the preparation of the Caithness Local Plan) and 2007 have concluded that the area should be protected as openspace as development would diminish the amenity and character of the area. It is highlighted that one Inquiry Reporter concluded that “*Available land and a willing owner does not justify development through either local plan use allocation or the granting of planning permission.*”

### Environmental and Heritage Issues

- The sense of openness of the area and the green spaces are important to the setting of the town. The area adds character to the north west of Thurso and the approach into the town and through to the centre. It will create an overdeveloped feel which will destroy what makes the place attract people who want to relocate to the area. The entry point into the town from the west will become increasingly important given its position on the NC500 route. Thurso needs to retain its openspaces to make the town attractive. The land could be opened up for amenity and recreational based tourism purposes, e.g. footpaths and cycle tracks. The land is green belt and must be protected. There will be no open spaces left in Thurso.
- The ground between Pennyland and Burnside is prime agricultural land and as such should be protected from adhoc development.
- The current Amenity allocation must be preserved. The current local plan states that the Council will explore the availability of funding to develop open land to the north of Pennyland Farm as a public park and playing fields.
- It will result in the coalescence between Burnside and Thurso. A reason being provided for joining Burnside to Thurso is that there is a lack of amenities in Burnside. However, on close inspection of the new CaSPlan, it would actually appear that there are no plans to build any new amenities once the two areas are joined.
- The areas shown as Expansion of the Green Network would not stand up to the harsh weather conditions. The best land use for practical maintenance is agricultural/grazing. There is no detail on who is to provide and maintain the openspace proposed on TS04, particularly around the A9 and A836.
- The moors contain a wide range of flora and fauna, many of which are endangered species. Since grazing on the moors has stopped a natural woodland is beginning to be established. The moors provide an easily accessible outdoor and recreational asset to the town.
- Reference to positive environmental and recreational features at Wolf Burn are not clear and the expansion of greenspace on the map appears to be placed away from the burn.
- The site is highly exposed and is not suitable for housing as it is on a north west slope facing the prevailing winds from the north coast.
- The moorland at High Ormlie is an important tourism and recreational asset as it has uninterrupted views across the Pentland Firth and out towards Sutherland.
- The ground conditions north of Provost Cormack Drive have been deemed unsuitable for development so the Plan should indicate what additional works would be required by a developer to ensure development is structurally secure. Land at High Ormlie contains a number of underground natural springs which would

increase problems of any construction undertaken as well as contribute to increased localised flooding and exacerbate drainage issues for existing householders in High Ormlie. Drainage – Rainfall water flows down the moors towards the houses at Pennyland. Development of TS04 could make this worse.

- There is at least one archaeologically significant site which could provide a potential heritage/tourism attraction.
- The housing site west of Pennyland House is not suitable for modern house building given it adjoins the B-Listed steading and house (which the landowner has allowed the steading to significantly deteriorate and has now become an eyesore). Proposed development would adversely impact the cultural heritage of the area, including the B-Listed Pennyland House and commemorative plaque to Sir William Alexander Smith.
- Development west of Rockwell Crescent would cause a reduction in light to the existing neighbouring houses.
- One respondent requests that if development was to go ahead then there should be at least a 30 metre setback from properties at Pennyland Estate and housing should be restricted to single storeys.

#### Infrastructure

- Access to the proposed houses west of Pennyland House would cause major traffic problems involving Pennyland School, Castlegreen Road, Pennyland Drive and Forss Road. There are no suitable access points via Castlegreen Road as only one very narrow passage exists, next to the houses for the elderly, which is not wide enough nor acceptable given its adjoining use. It is also very close to both the junction to the A9 and the junction into Lidl. As a result it would add significantly to congestion in the area.
- The proposed access from Forss Road is currently too narrow with no option to widen it. The entrance into Forss Road is used by residents to park their cars and further development off it would result in major safety issues. Pennyland Drive is also a narrow, congested road and there are existing traffic issues due to the proximity to the primary school. Previous proposals on the site have shown that Forss Road is too narrow for access.
- Proposed access from Pennyland Drive would result in the loss of an important playpark.

#### Other issues raised

- Modernising the town should focus on redeveloping vacant buildings and brownfield sites. All new development should be restricted to suitable brownfield sites.
- The Town Centre First Policy directs all new housing and commercial development towards the town centre, not on the outskirts.
- One of reasons for purchasing the house was open views over Thurso Bay.
- There is enough justification for the land at Pennyland to be given Special Landscape Areas status.

#### Other concerns raised:

- If this draft CaSPlan goes through, the development of houses and a hotel will be given outline planning permission. This rules out the local community being able to object in the future before the development begins.
- Questions the reasons for developer requirements referring to TS01, TS02 and

TS03 which does not appear to make sense.

- The indicative capacity identifies 180 houses but the Developer Requirements show 180 at High Ormlie and another 20 west of Pennyland House.

Fiona Mackie (978748), Nick Russel (979216), Carol Paterson (979637), Colin Paterson (979739), Don Mackay (979822), Rebecca Paterson (979904), Katelin Mackenzie (979954), Cartwright (979956), Dean Craig (980100), Jamie Henderson (980168), Steven Grant (980189), Pennyland House B&B (971783), Grant Maxwell (979898), Karen Risbridger (980206), Alan Ritchie (980220), Eilidh Paterson (980233), Willie Steven (980239), Jamie Mackay (980254), Sean Miller (980259), Caroline Steven (980245), Andrew Bremner (980248), Amanda Gunn (980290), Ronald Paterson (979807), Emma Gunn (979970), Euan Sinclair (980244), Emma Budge (980201)

Supports the inclusion of TS04 for one or more of the following reasons:

- There is a need for quality new housing in Thurso. More choice is needed in the housing market.
- There is growing demand for commercial space at the business park due to the success of the existing businesses. Development of TS04 will increase capacity for the future growth of the business park and stimulate the local economy.
- It provides a natural expansion of the town's existing residential and business areas.
- It will provide a stimulus to the rest of the town, including its retail profile.
- Supportive of the return of a petrol station at Thurso West.
- A mix of land uses would form a good approach to the town.
- The area is within walking distance of the town centre and its amenities.
- The planned enhancement of Ormlie moors and creation of a community woodland would be very useful recreational areas.
- There are few existing amenities within walking distance for residents of Gills and Burnside and it would give them a greater sense of community. It would provide better connections between Thurso and Scrabster.

#### Tulloch Homes Ltd (979063)

Tulloch Homes Ltd are joint owners of a major portion of the Thurso west site and confirm their intention to participate in the future master planning of the area and the development of same. Tulloch Homes note that the south west boundary of the site to include phase VIII per the Thurso Western Expansion Framework Plan (page 65 of the current adopted Caithness Local Plan) appears to have been amended providing a lesser extent of development land although from discussions with the Council's planning officials understand the line to be indicative and the boundaries and uses will be borne out through a proper master planned approach. With regards indicative housing and business capacities along with locations of uses the plans comments should not be overly prescriptive as the quality and suitability of the design solution for the site is a more appropriate determining factor.

#### Thurso Bay Trading Co (980395)

The landowner states that the points raised in his submission to the MIR are still relevant. These focused on: Thurso Charrette providing a good basis for CaSPlan; community debate on and general support of the sites over recent years; mix of housing, commercial and greenspaces providing a long term strategy for the town; and commercial interest in

the proposals.

The energy and positivity taken from the Charrette, with the input from John Thompson & Partners, was a breath of fresh air. This vision, which the town contributed to, was carried forward to the MIR and now the planning officials' recommendations. Landowner agrees wholeheartedly with the ambition and holistic approach adopted through the Charrette process, especially as it was run by an independent team that had no prior involvement or interest in the planning of the area. Planning at a local level should be inclusive and set like this in the future, as was the case at the Thurso and Wick Charrettes. This was a positive step forward in Scottish planning policy.

Supportive of the general vision for Thurso as it will transform Thurso into a sustainable, ecologically friendly area, where outside space is as important as inside space, an area to be enjoyed by residents and visitors alike.

Landowner provides following reasons in support of TS04 and TS14:

- Development in this western part of Thurso will help make the town a more diverse, exciting, healthy and great place to live and work.
- Sensibly scaled and well connected mixed-use development will serve existing residents and those who will settle here in the future.
- The landowner has commissioned John Thompson & Partners to prepare a first phase masterplan to be submitted during the summer of 2016.
- The proposed hotel and leisure facility and park, would go a long way to reversing the isolation and lack of amenity that is evident in these communities - adding new places for people to meet and enjoy indoor and outdoor activities – and hopefully strengthening the sense of local community in the process.

Objects to Retail and Hotel not being included as allocated uses of TS04.

#### SEPA (906306)

Add the following developer requirement “The Wolf Burn should be protected by a 25 m development exclusion buffer. Note that discharges to this watercourse are unlikely to be acceptable.”

#### SNH (909933)

The “Developer Requirements” text for the TS04 allocation is confusing as it refers to TS01 – TS03, but not TS04. If the text should be referring only to the allocation TS04, then the developer requirements reference to the River Thurso SAC and SSSI can be removed. This is due to the distance and lack of connectivity to the SAC/SSSI, meaning it is extremely unlikely that there would be impacts on either protected area.

#### Scottish Water (953627)

Scottish Water ask that should the Council become aware of the potential non-domestic usages upon these mixed-use sites, that Scottish Water Development Planning be made aware to augment our Growth Modelling activities and to inform our investment programme where applicable. Again, any site with a contaminated land designation will require a similar report prior to any connection to the water supply being approved.

## Representation to the Modified Proposed Plan (September 2016):

### **TS04 - Thurso West**

#### Thurso Bay Trading Co. (MPP980395)

The landowner of TS04 objects to the Long Term status of specified housing sites within the allocation. The Plan needs to be flexible, responsive to market conditions and should encourage development in all economic circumstances, in accordance with SPP. If the 'long term' references continue to be used, we have concerns that this would hinder developer interest in the TS04 site. This is an unnecessary burden on the site.

Jeremy Evans (MPP1031927), Ian Westmorland (MPP1031981), Helen Robbie (MPP1032179), Don Mackay (MPP1032343), Graeme Reid (MPP1032386), Eilidh Paterson (MPP980233), Michael Cowie (MPP1032425), Iain Elder (MPP1032459), Valerie Moseley (MPP1031843), Abbie Wilson (MPP1032650), Carol Paterson (MPP979637), Aaron Taylor (MPP1032694), Eilidh Sinclair Wright (MPP1032760), Megan Wilson (MPP1032832), Reece Smith (MPP1032849), Ian Cannop (MPP1032993), Hamilton (MPP1032492), Steven Reid (MPP1032948), Alison Henderson (MPP1033471), James Henderson (MPP1033472), Monika Carson (MPP1033507), Colin Paterson (MPP979739), Yasemin Turanli (MPP1033545), Andrew Adamson (MPP1033812), Jan Mackay (MPP1032499), Sean Miller (MPP1033482), Abbey Sutherland (MPP1033845), Kerry Oag (MPP1033483), Martin Ross (MPP1033522), Amanda Gunn (MPP1033818), Jade Baikie (MPP1033831), Samantha Angus (MPP1034517), James Henderson (jnr) (MPP1033475), Charles Henderson (MPP1033480), Cartwright (MPP979956), John Hart (MPP1031794), Fraser Steven (MPP1033806), Michelle Will (MPP1034160), Nicky Cowie (MPP1034161), Karen Henderson (MPP1034643), Mary Paterson (MPP1034694), Thomas Watters (MPP1034436), Derek Taylor (MPP980213), Ryan Cameron (MPP1034708), Megan Williamson (MPP1034717), Sharon Smith (MPP1034572), Fiona McLean (MPP1034721), Pennyland House B&B (MPP971783), Ellie Spencer (MPP1034530), John McGeachie (MPP1034749), William Steven (MPP1033802), Carol Paterson (MPP979637), Colin Paterson (MPP979739), Lynne Reid (MPP1034346), Kerrie Martin (MPP1034602), Sandra Isabelle Harris (MPP1034546), Nicola Arthur (MPP1034246), Rebecca Paterson (MPP979904), Eilidh Paterson (MPP980233)

These representors are broadly supportive of the principle of development at TS04. However, they object to the Long Term status of site TS04 and would like to see it being allocated for development within the Plan period, with some requesting that the area should be allocated for Retail, Business, Sport Centre and Housing. The reasons provided included:

- The Plan should be flexible and open for potential development opportunities. The allocation must be adaptable as future development opportunities in Thurso for business, tourism, housing, retail or other development are unknown at present.
- It is a logical place and direction for growth of the town.
- There is increasing demand for such land uses with both the growth of the food and drink industry and promotion of the area's rich cultural heritage, e.g. Caithness Broch Project.
- Retail development is needed in Thurso as there isn't enough choice; many people travel to Wick for shopping.
- New housing would be attractive to young people as the current stock is not

suitable.

- It will help to support the growth of the local economy, creating new employment opportunities and boosting the construction industry,
- The long term status will only result in the neighbours which overlook the site attempting to block development proposals in the future.
- Development would be in keeping with the Charrette outcomes. Green networks should be formed through the site as part the masterplan which was envisaged at the Thurso Charrette.

Gary Parker (MPP968625), Steven MacDonald (MPP1032713), Margaret Smedley (MPP930596), Danny Doohan (MPP929481), Brian Johnston (MPP1033820), Catherine Murray (MPP1033682), Kathleen Faulds (MPP983151), Alison MacAdie (MPP1034158), Kenneth Nicol (MPP977530), Timothy Ridgley (MPP979979), Jacqueline Ridgley (MPP930800), Jason Ridgley (MPP980223), Anthony Ridgley (MPP979975), Catherine Stewart (MPP1034231), Angus Mackay (MPP1034300), William Walker (MPP979718), Elizabeth Lawson (MPP1034442), Hannah Johnston (MPP1034463), Louise Smith-Dasar (MPP981718), John Faulds (MPP983248), St Clair Hotel (MPP980003), Amanda Robertson, (MPP1034460), Robert Falconer (MPP980046), Elizabeth Mackay (MPP1034732), Keith Morrell (MPP1034784), Amelia Walker (MPP931321), Tanya Sutherland (MPP979994), The Pentland Hotel (MPP979958), Lyndall Leet (MPP983272), Phyllis Nicol (MPP980599), Herbert Lawson (MPP1034148), Donald Mackay (MPP981995), Georgina Mackenzie (1034374), William James Stewart (MPP1034252), Diana Johnston (MPP1034710)

Representors are opposed to development of the section of TS04 west of Pennyland House and/or TS04 as a whole for one or more of the following reasons:

#### Economy

- The National Review of Town Centres recommended that Council's should support development in the centres before considering developments elsewhere. This includes working with housing providers to bring empty properties back into use as affordable housing.
- New housing or commercial development should be restricted to brown field sites which could be redeveloped. There are numerous empty properties and redundant brownfield sites (e.g. the Thurso Mart and Bridgend) in the Thurso town centre area which could be developed.
- The priority should be on developing other sites first. Other sites would have a significantly less impact on the landscape. The focus should be on smaller sympathetic development which is more in tune with the wishes of the community rather than a developer driven scheme.
- The development of the wave and tidal renewables industry is slower than originally anticipated. Scottish Government has set up a task force for the wave industry but there is unlikely to be any major developments in this sector before 2020 and limited, if any development, in the Caithness area. Any development is likely to be directed to Wick rather than Thurso.
- Even if all the jobs were replaced from Dounreay, and Vulcan there is unlikely to be a need for major housing demand or major commercial (office) accommodation.
- The length of time that units in the Business Park have lain empty, and the

availability of ground at Janetstown which has not been built on, is testament to the fact that no big businesses are coming here in the near future

- There is no requirement for a fourth filling station in Thurso. One filling station was for sale for a long time and was not sold as a going concern. It would result in the closure of at least one of the three existing filling stations. Another filling station would result in higher fuel prices. Given the topography of the area, a petrol station will create a high risk of hydrocarbon pollution in the soil.

#### Environment

- It will create another built up area resulting in a loss of the sense of openness. This would damage the first impression for those entering the town from the east. Development would destroy the beautiful western approaches.
- The land has been shown to be some of the best arable land in Caithness.
- The land should be safeguarded for recreational use rather than retail, housing or hotel.
- The current Amenity allocation as shown in the Caithness Local Plan must be preserved. The local plan states that the Council will explore the availability of funding to develop open land to the north of Pennyland Farm as a public park and playing fields.
- The moorland is well used amenity/recreational area enjoyed by runners, walkers, children, dog walkers. The area is of natural beauty with a variety of wild flora and fauna. The area could be a permanent green belt and a wildlife reserve. The area could be safeguarded for much needed walking area for the community and as a tourist facility.
- The original recreational plans were not implemented due to a lack of finances yet there are no details about who is going to maintain the proposed green network/corridors.
- The aim of creating green network areas from the sea through Pennyland to the moorland at High Ormlie and out past the golf course contradict the allocations which encourage development of the area.
- The area currently helps to protect houses from the weather coming in from the north.
- Holiday makers often feedback that the approach into Thurso via the Mount Vernon estate is not particularly pleasant so it would be good to keep the other approach more open.
- Questions the reason why there is no planning law or regulation which protect the panoramic views. Requests that the coastline at Thurso should be given the same protected status as that from Durness eastwards. Safeguard the areas as a Special Landscape Area.
- Local resident states that if any development is to take place, given the close proximity to the houses at Forss Road, Brim Road, Hoy Terrace, Rockwell Terrace and Rockwell Crescent as a minimum there should be at least a 30 metre amenity/open space corridor alongside the current field boundary (similar to the requirement alongside the A836) and housing restricted to bungalows.

#### Planning issues

- There have been 3/4 public inquiries in respect to this land. In all the reports different Reporters state in similar words that the character and amenity of this part of Thurso and of the general western approaches to the town will be diminished by

any development. They all reached the same conclusion and the circumstances have not changed. These endorsements undoubtedly should be a major consideration. The Council assert that these are new developments but they are the same proposals in the same place.

- Stating what should go where is tantamount to bypassing the Outline planning application stage. This should not be allowed. A site's inclusion in the Local Development Plan is 'better than outline planning permission' as it remains the Council's position for the duration of the adopted plan. People cannot then object to the principle of the development but only comment on the detail.
- The Council amalgamated TS04 into a single large allocation. This is too large and should be split between land west of Pennyland House and the area between Ormlie and the Business Park (as per the Caithness Local Plan).
- Concerns that leaving it to "future plan reviews [to] confirm the mix of development across the site" could result with a miscellany of buildings of various sizes.
- There should be no coalescence of Thurso and Burnside. The requirement for services was never a consideration when the current local plan was approved in 2002, and there nothing in the CaSPlan for the inclusion of services, so why all of a sudden has this become a problem and they now need to be joined.
- Questions how can there be "appropriate mitigation to minimise the visual impact" when any building on this green field site would absolutely desecrate one of the most iconic views in the North of Scotland especially when approaching from the West.
- A third option should have been presented to Councillors at Committee for the removal of the 20 house allocation and land for the filling station.
- The Caithness Local Plan (2002) allocated land for a hotel to the West of Pennyland House. The landowner has confirmed he will not build it on that site. Therefore the site should be removed from the Plan. All the sites at Thurso West which were in the Local Plan are still available.
- The landowner of TS12/14 also owns Pennyland House which was the birth place of Sir William Alexander Smith, founder of the Boy's Brigade, and all the buildings on the site are B Listed. Despite continued assurances from the landowner that it would essential building maintenance would be carried out nothing has happened and they are now in a very poor state of disrepair. How can the requirement by the developer to have "sensitive siting and design due to the proximity of the Listed Building" for these 20 houses be relied upon?
- It is claimed that in 2005 the landowner and his partner, Tulloch Homes, instigated the move of ASDA from the Mart Site to Pennyland but the application was rejected by a Government Reporter. This resulted in Thurso losing out on a new supermarket which the community wanted.
- Council planners appear to have backed Pennyland as a key growth area while unjustly eliminated others.

#### Community/Demographics

- Demographic changes show that there is no need for further major housing development in Thurso. The Council have already stated that there is an over provision of housing in Thurso. The latest census shows there has been a declining and ageing population in Thurso (4% decline between 1991 and 2011 and a 0.9% fall between 2001 and 2011 which is the 3<sup>rd</sup> highest rate of decline in Highland). Young people are moving away from the area and the school roll is



declining (the High School roll declined 18% since 2009/10 and it is expected to decline a further 14% by 2020). The HNDA shows there is no short-medium term demand. The Council's Ward Information identifies that there is a low supply of new housing being built in Thurso and the overall supply is adequate. With the expected demographic changes this is likely to remain the same.

- No need for the volume of houses proposed. The decommissioning of Dounreay and NRTE will lead to a decline in population and in turn a surplus of available housing. The HNDA shows there is no short-medium term demand.
- The previous planning permission for 400 houses has expired which shows there is no real demand for more housing. The Council have also reduced the housing figure from 400 to 200 in the Plan which indicates the lack of demand. Council figures show that there were only 170 houses built in Thurso between 2006 and 2010. The housing figures show that the majority of new housing is in Landward Caithness meaning people are choosing/wishing to live in the countryside, not in the main towns. Based upon the Director of Planning & Developments 2014 Report, if the Council required 530 houses to be built, then based upon past history 67% will be required in the landward areas. Probably only 95 will be required in the Thurso area. These could be located in other, more suitable sites than the proposed allocations alongside the A9 at Pennyland.

#### Infrastructure

- Access to the proposed houses west of Pennyland House would cause major traffic problems involving Pennyland School, Castlegreen Road, Pennyland Drive and Forss Road. There are no suitable access points via Castlegreen Road as only one very narrow passage exists which is not wide enough nor acceptable given its adjoining use. It is also very close to both the junction to the A9 and the junction into Lidl. As a result it would add significantly to congestion in the area.
- During 2015 an area of land adjacent to Pennyland House was used as a turning area for long loads coming out of Scrabster Harbour and heading West. Any development in this area will restrict the business operation of Scrabster and industrial development to the West of the area.
- The proposed "site access" road from Burnside through the proposed housing/mixed development site will spoil the enjoyment of the area and result in a bottleneck at the junction between Provost Cormack Drive and Ormlie Road, which is used by a pedestrians including many children. Traffic would also have to double back through the town or divert through Halkirk.
- New housing development should be accessed off the proposed relief road.

#### **Modifications sought by those submitting representations:**

#### **Modifications sought at Proposed Plan stage:**

#### **Thurso West distributor/relief road**

Scottish Government (963027), John and Helen Barkham (981629)

Removal of the indicative lines shown in the Thurso Settlement Plan and the settlement text for potential routes and road connection with the A9 trunk road.

Mrs Jane Telfer (979224)

The proposed distributor road should be situated west of its designated route to avoid crossing through the community woodland as marked on the plan.

### **TS04 Thurso West**

Gary Parker (968625), William Marshall (941627), Hamish Robertson (979473), Lee Parnell (979688), Colin Paterson (979739), Sheila Finlayson (979790), Jane Telfer (979224), Kenneth Nicol (977530), Jacqueline Ridgley (930800), Timothy Ridgley (979979), Anthony Ridgley (979975), The Pentland Hotel (979985), Tanya Sutherland (979994), Tanya Sutherland (979994), Walter Mclachlan (979426), William Walker (979718), Ian Walker (979716), Linsey MacDougall (980035), David Doohan (980228), Stuart Andrew (980221), Gary Angus (980227), Alan Loomes (980235), Amelia Walker (931321), Gayle Rennie (980274), Lee MacDougall (980312), Jane Foster (980307), Agnes Macdonald (980230), Margaret Smedley (930596), Stuart Vines (967328), St Clair Hotel (980003), Stephen Beckett (980229), David Lord (1069719), Jason Ridgley (980223), Janetta Christie (975843), Cecilia Brands (979454), Karen McLean (979677), Kirsten Murray (979696), Sheena Mclachlan (960835), Michelle Fraser (979884), Donna Flowerday (979953), Michael Bowden (980202), Robert Falconer (980046), Stuart Liddle (980236), Phyllis Nicol (980599), Tom Jackson (981229), John and Helen Barkham (981629), Louise Smith-Dasar (981718), Jean Alexander (981921), Donald Mackay (981995), Carol Murray (983145), Kathleen Faulds (983151), Isabel Kay (983245), John Faulds (983248), Lindsay Kay (983250), Elizabeth Mackay (983255), Amanda Robertson (983266), Stephen Anderson (983269), Lyndall Leet (983272), Cynthia Calder (980214), Danny Calder (983991), Andrew Fraser (983996), Fiona Doohan (980015)

Respondents sought one or more of the following modifications to the Plan:

- Removal of the allocation for 20 houses west of Pennyland House
- Removal of the allocation for a filling station

Some respondents want the complete removal of the Mixed Use allocation TS04.

#### Thurso Bay Trading Co (980395)

Add Retail/Leisure to the list of uses in TS04.

#### SEPA (906306)

Add the following developer requirement: "The Wolf Burn should be protected by a 25 m development exclusion buffer. Note that discharges to this watercourse are unlikely to be acceptable."

#### SNH (909933)

Amend the Developer Requirements text for the TS04 allocation with regards to reference to sites TS01 – TS03. If the text should be referring only to the allocation TS04, then the developer requirements reference to the River Thurso SAC and SSSI can be removed.

#### Scottish Water (953627)

Any site with a contaminated land designation will require a similar report prior to any connection to the water supply being approved.

## **Modifications sought at Modified Proposed Plan stage:**

### **TS04 – Thurso West**

Jeremy Evans (MPP1031927), Ian Westmorland (MPP1031981), Helen Robbie (MPP1032179), Don Mackay (MPP1032343), Graeme Reid (MPP1032386), Eilidh Paterson (MPP980233), Michael Cowie (MPP1032425), Iain Elder (MPP1032459), Valerie Moseley (MPP1031843), Abbie Wilson (MPP1032650), Carol Paterson (MPP979637), Mr Aaron Taylor (MPP1032694), Eilidh Sinclair Wright (MPP1032760), Megan Wilson (MPP1032832), Reece Smith (MPP1032849), Ian Cannop (MPP1032993), Hamilton (MPP1032492), Steven Reid (MPP1032948), Alison Henderson (MPP1033471), James Henderson (MPP1033472), Monika Carson (MPP1033507), Colin Paterson (MPP979739), Yasemin Turanli (MPP1033545), Andrew Adamson (MPP1033812), Jan Mackay (MPP1032499), Sean Miller (MPP1033482), Abbey Sutherland (MPP1033845), Kerry Oag (MPP1033483), Martin Ross (MPP1033522), Amanda Gunn (MPP1033818), Jade Baikie (MPP1033831), Samantha Angus (MPP1034517), James Henderson (jnr) (MPP1033475), Charles Henderson (MPP1033480), Cartwright (MPP979956), John Hart (MPP1031794), Fraser Steven (MPP1033806), Michelle Will (MPP1034160), Nicky Cowie (MPP1034161), Karen Henderson (MPP1034643), Mary Paterson (MPP1034694), Thomas Watters (MPP1034436), Derek Taylor (MPP980213), Ryan Cameron (MPP1034708), Megan Williamson (MPP1034717), Sharon Smith (MPP1034572), Fiona McLean (MPP1034721), Pennyland House B&B (MPP971783), Ellie Spencer (MPP1034530), John McGeachie (MPP1034749), William Steven (MPP1033802), Carol Paterson (MPP979637), Colin Paterson (MPP979739), Lynne Reid (MPP1034346), Kerrie Martin (MPP1034602), Sandra Isabelle Harris (MPP1034546), Nicola Arthur (MPP1034246), Rebecca Paterson (MPP979904), Eilidh Paterson (MPP980233)

Expand the range of uses allocated within Mixed Use site TS04 Thurso West to include Retail and allocate Long Term sites for development within the Plan period.

Gary Parker (MPP968625), Steven MacDonald (MPP1032713), Margaret Smedley (MPP930596), Danny Doohan (MPP929481), Brian Johnston (MPP1033820), Catherine Murray (MPP1033682), Kathleen Faulds (MPP983151), Alison MacAdie (MPP1034158), Kenneth Nicol (MPP977530), Timothy Ridgley (MPP979979), Jacqueline Ridgley (MPP930800), Jason Ridgley (MPP980223), Anthony Ridgley (MPP979975), Catherine Stewart (MPP1034231), Angus Mackay (MPP1034300), William Walker (MPP979718), Elizabeth Lawson (MPP1034442), Hannah Johnston (MPP1034463), Louise Smith-Dasar (MPP981718), John Faulds (MPP983248), St Clair Hotel (MPP980003), Amanda Robertson (MPP1034460), Robert Falconer (MPP980046), Elizabeth Mackay (MPP1034732), Keith Morrell (MPP1034784), Amelia Walker (MPP931321), Tanya Sutherland (MPP979994), The Pentland Hotel (MPP979958), Lyndall Leet (MPP983272), Phyllis Nicol (MPP980599), Herbert Lawson (MPP1034148), Donald Mackay (MPP981995), Georgina Mackenzie (1034374), William James Stewart (MPP1034252), Diana Johnston (MPP1034710)

Remove the section of TS04 which is west of Pennyland House and/or remove the whole of TS04 from the Plan.

## **Summary of responses (including reasons) by planning authority:**

## **Planning Authority's consideration of representations on the Proposed Plan in August 2016:**

### **Conflict of Interest**

The Council followed all the correct procedures and do not accept that there has been any conflict of interest. The Council applied to the Scottish Government's Charrette Mainstreaming Programme in 2012 to carry out whole town charrettes for Wick and Thurso. It was intended that the charrettes would support and inform the Main Issues Report (MIR) (CD04) and be a key element in the preparation of the Local Development Plan.

The consultant team was selected by a mini-competition to work with the Scottish Government and the local project delivery team at The Highland Council to provide the expertise and organisation required to facilitate and deliver the charrettes in line with pre agreed timetables and the programme outputs. As part of the tendering process the Scottish Government acted as Contract Manager for the Council to establish the most suitable consultant team for the project, and following an interview John Thomson & Partners were appointed.

After the Wick and Thurso Charrettes had concluded a private landowner in Thurso subsequently approached John Thomson & Partners to carry out consultancy work. John Thomson & Partners then contacted the Council to check if there were any issues. We established at that stage that there was no conflict of interest as there was no ongoing or outstanding work to be carried out in regard to the charrette nor was there any anticipation that JTP would be commissioned to carry out any further work on this matter for the Council. As a private sector consultancy, JTP was available to anyone that wished to employ their services.

### **Thurso West distributor/relief road**

Support for the Thurso West distributor/relief road is noted.

With advice from the Council's Transport Planning Team, it is established that there is a clear rationale for the inclusion of the distributor/relief road in the local development plan:

- One of the main constraints within Thurso is the reliance on a single road crossing of the River Thurso. This leads to congestion problems during particular situations.
- It would help relieve traffic congestion in the town centre. The A9 Trunk Road runs through the centre of the town. However the town centre is not suitable for HGVs or transporting large haulage items due to the narrow roads and sharp corners. Traffic is regularly forced to stop or roads closed when large vehicles move through the town centre.
- The traffic congestion and HGV movement is likely to increase due to the expansion of commercial activities at Scrabster Harbour and at the Enterprise Area at Scrabster Mains Farm which the Scottish Government is actively promoting in the National Planning Framework 3 (CD02). The expansion of the marine renewables industry and increase in business from the oil and gas industry in the area will also

put greater pressures on local roads.

- Developments such as that proposed at Pennyland and Scrabster may require further access points off the A9 trunk road and other proposed development will increase traffic onto the A9 via existing junctions. Together these will contribute to traffic congestion moving through the town on the trunk road.
- The creation of a distributor road is required to open up housing and employment allocations in the west of Thurso. Although these are some of the most suitable expansion sites many have been held back due to the need for investment in transport infrastructure. It is important that the road is designed to be potentially upgraded to relief road status and sufficient land is safeguarded.
- Identifying potential routes for strategic improvements will help to ensure that they are safeguarded from development which may impact on the feasibility of its delivery in the future. The bypass route identified in the Caithness Local Plan (2002) (CD17) was challenged in the past. A Public Local Inquiry was carried out in 1995 which concluded that the route should be preserved and confirmed the western edge of the housing estate at Upper Burnside.

The potential relief road route was a topic of discussion during the charrette. A general consensus was reached that the preferred route should continue (as per the Caithness Local Plan (CD17)) to connect with the B784 immediately south of Dunbar Hospital but pass on the west of the Business Park rather than the gap to the east (i.e. as per the Caithness Local Plan and Thurso Western Expansion Area Development Brief (CD23)). However given that no technical assessment has been prepared to identify the suitability of the route the line shown in the existing Development Plan has also been shown to ensure it remains as an option. Developers of TS04 will be required to deliver the early phases of the distributor road which will service the western expansion areas and help to connect up several areas in Thurso West. Sections of the distributor road should be designed to be able to be readily upgraded to provide additional capacity.

In relation to the connections with the A9, Transport Scotland highlighted that SPP states that spatial strategies should be deliverable. Although it is recognised by the Council that there is no commitment by the organisations who may deliver such strategic transport improvements this position is also widely understood by other stakeholders. Despite this there is a strong desire by the Council and the local community (shown during the charrette and in response to the MIR (CD04)) for the routes to be shown in the Plan, and to address transport issues highlighted above.

The Council's Transport Planning Team note that the Caithness Local Plan (CD17) indicated that ultimately the western distributor road could connect to the A9 via a new river bridge to the south of the town. The construction of the bridge would inevitably be dependent on the availability of public funding. The construction of a new bridge would provide an alternative access from the A9 to the development areas to the west avoiding the town centre and would also provide an alternative route for traffic heading to/from the harbour at Scrabster or places to the west such as Dounreay. The road would therefore act as a 'relief road' removing traffic from the town centre, rather than a 'bypass'.

It was also noted that CaSPlan shows a major area of proposed development at Pennyland, to the west of Thurso. While some of the eastern parts of this area could be accessed from existing residential streets this will not be possible for areas to the west. Additionally Business allocations in the western part of the site will require additional

access. A road network will therefore be required from the existing A836 into the site and this could form the basis of the type of western distributor envisaged in the Local Plan (CD17).

The Transport Planning Team concluded that the approach set out in the Local Plan (CD17) adopted in 2002 is reasonable. It allows the provision of a western distributor road to serve the development areas to the west funded by the developers and in the longer term can form the basis of a new river crossing and connection over the railway line to the A9 to the south. This will inevitably require public funding but when completed will provide an alternative route to the town centre for heavy traffic. In the meantime it is recommended that land is not being allocated on the route or. The connection to complete the route to Scrabster will require safeguarding of route options each side of the long term housing site as shown in the Plan.

If the route is not included within the Development Plan then there is no framework in place for protecting land for a potential relief/distributor road in the future. The result of this could be hugely detrimental to the future growth and sustainability of the area, especially considering the expectations at both regional and national levels for the expansion of the offshore renewables sector.

In view of the comments seeking removal of the indicative distributor/relief road from the Plan, for the reasons set out above we do not consider this modification to be necessary. However, if the Reporter agrees then the Council would be content with removing the section east of the B784 (Ormlie Road) which connects with the A9. This would remove the relief road/bypass element of the road with only the distributor connection remaining and be potentially deliverable without funding from Transport Scotland. As a result this would also remove any conflict with SPP (CD01) paragraphs 274 and 275. Whilst such an approach would not necessarily prevent future consideration of linkage to the A9, it may reduce expectation for such a connection and may make it more difficult to maintain options for such future connections.

Resulting from discussions with SNH regarding the HRA (CD09) the following mitigation was identified for inclusion in paragraph 112: "Development proposals which involve crossing River Thurso must demonstrate that there would be no adverse effect on the integrity of the River Thurso SAC through submission of a satisfactory Construction Environmental Management Plan (including pollution prevention)" As the HRA requires to be signed off by SNH for the Plan to be adopted, the Council is content for this mitigation to be added to the Plan. This will be subject to the Reporter being minded to maintain the reference to the extension of the road east of the B784 (Ormlie Road) which connects with the A9 (as noted in the paragraph above).

#### **TS04 Thurso West**

The allocation of sites TS04, TS12 and TS14 was the most controversial component during the plan consultation. It is recognised that valid points both for and against development were raised during the consultation. The full responses to each of the issues raised, including the recommended position on any modifications which were sought to the Plan, are set out below and grouped under headings relating to the issues raised. Whilst taking account of the issues raised in relation to TS04 the recommended position was to

retain the site as is set out in the Proposed Plan. However, to ensure that a clear agreement was reached by Committee on the preferred outcome several options for sites TS04, TS12 and TS14 were presented to Committee in August 2016 (see Issue 12 Thurso TS12 and TS14).

The comments made in support of the inclusion of TS04 are noted, including: support for the charrette process in providing a vision for the area; provision for more business space adjoining the Business Park; and, the enhancement of amenity greenspaces and entrances into the town.

### Housing

In respect to the range of issues raised in regard to housing supply and demand please see Issue 3 Growing Communities under the Housing Land Supply section. This sets out the reasons why we consider there to be need for the amount of housing land identified in the Plan.

#### *Housing site west of Pennyland House*

The area between the housing site west of Pennyland House and the commercial allocation east of the Business Park is identified as a Long Term Mixed Use site within the Developer Requirements. As explained at paragraph 23 in the Plan sites identified as "Long Term" indicate the likely preferred direction for growth beyond the plan period. The suitability of these sites for development has been subject to consideration through the preparation of this Plan. However, they are not being phased for development within this Plan period and allocated sites are expected to be developed before any long term sites can be considered. During future reviews of the Plan the Council will consider bringing forward any of those sites as allocations (subject to further assessment and identification of developer requirements) or remain as long term sites.

Concerns over the effectiveness of the Housing allocation on land west of Pennyland House appear unjustified as the SEA site assessment did not show any major constraints which would be limiting factors to development. If over time the site proves to be ineffective then the site's inclusion in the Plan can be reconsidered at future Plan reviews.

#### *Indicative Housing Capacity Figure*

In relation to comments on the indicative housing capacity for TS04, the figure reflects the strategic nature of the site and the extent of infrastructure needed to open up the site that will be delivered within the plan period. The areas identified as Long Term Housing sites are dependant on the allocated sites being developed beforehand. Consequently the indicative housing capacity figure of 200 reflects the amount of land which is considered to be available within the Plan period.

### Economic Issues

In respect to the range of issues raised in regard to the current and future economic prospects for the area please see Issue 4 Employment. This outlines the main industries which are considered to have significant growth potential and are supported by the strategy and land allocations in the Plan.

#### *Allocation of land for Filling Station*

The filling station allocation is in a strategic position for the western expansion of Thurso,

including being located next to the new distributor road and close to the Enterprise Area. Should these developments be delivered there may be greater need for an additional filling station in that area. The filling station together with expansion of the Business Park provides for greater scope to enable wider development of TS04 by contributing towards infrastructure provision.

Although the former filling station on Ormlie Road has recently been bought over and re-opened the filling station at Castlegreen Road was recently demolished to make way for Lidl's supermarket expansion. This means there are three filling stations in Thurso: on Ormlie Road, Mansons Lane and the A9 at Bridgend.

There would be a presumption in favour of redeveloping the former garage site next to the Weigh Inn as it is located within the Settlement Development Area boundary and classified as a brownfield site. However, given that it was not suggested by the landowner or potential developer the site may not be effective in the short term. The Council considers that the site should remain unchanged and no modification is proposed.

#### *Commercial allocation at Pennyland Steading*

The allocation in the existing Caithness Local Plan identifies the area west of Pennyland House for a hotel with the B-Listed Pennyland House and Steading forming part of the allocation. Since then Pennyland House has been established as a successful B&B and there has been no interest in progressing with development on the hotel allocation (site reference 21 in the Caithness Local Plan (CD17)). This was taken into account when proposing to reallocate the land for Housing. Although the Council remains in favour of retaining and incorporating the steading into other proposals, e.g. tourism or housing, it is not considered appropriate to be part of the allocation. The Council is not minded to make any modification to the Plan.

#### *Town Centre Regeneration*

Objections to the inclusion of TS04 on the grounds that development must be directed to the town centre are not considered as appropriate. The Plan promotes the regeneration of Thurso town centre and enhancing its vitality and vibrancy is shown as one of the key Placemaking Priorities. The introduction of the Town Centre First Policy also directs all significant footfall generating uses within the identified town centre boundary. The Council recognises, however, that it is not appropriate to direct all development to the town centre. Also due to the potentially high additional costs involved in redeveloping town centre sites alternative opportunities outwith the town centre need to be identified to ensure that important investment in the area is not discouraged. As a result no modification is proposed to the Plan.

#### *Directing commercial development to existing centres*

The Plan already focuses commercial development towards existing or recognised future commercial centres. For example, the Business components of TS04 are located next to the Business Park and the only Industrial allocations in Thurso are at Scrabster Harbour and the Enterprise Area. Business uses form part of several other Mixed Use allocations in Thurso (e.g. TS05 and TS06) but these provide greater flexibility for the redevelopment of brownfield sites which are also relatively close to the town centre. As a result no modification is proposed to the Plan.

#### Planning History



Planning history, including previous decisions, is relevant background and provides context for the current situation in Thurso west. However, the citing of previous planning decisions as a reason for not allocating land is not appropriate. The development plan review allows for the opportunity to look at new development proposals, including those being put forward on sites where previous decisions were unfavourable to particular development proposals. The previous Public Local Inquiries, held in 1996 (planning application) and 2001 (local plan), examined the suitability of development on the fields at Pennyland and have been fully considered in the preparation of the Plan. Following the submission of two supermarket applications in Thurso (Asda at Pennyland 06/00038/OUTCA and Tesco on the former mart site on Ormlie Road 08/00494/REMCA) a Public Local Inquiry was held in 2007(DPEA Case Ref: PPA-270-459). After deliberation the Reporter granted planning consent for the proposal at the former mart site and refused the Asda proposal at Pennyland.

The sites at Pennyland were put forward for discussion during the Thurso Charrette in 2013. The land south of the A9 was envisaged as having potential for residential and mixed use development given its proximity to the town centre and fine northerly views. The land north of the A9 was also considered at the charrette which looked at potential hotel locations in Thurso West with options on land west of Pennyland House and to the north of the A9, west of the caravan park. The final Charrette Report (CD25) envisaged a mixed use development south of the A9 (with potential for a hotel) and the area north of the A9 was recognised as being a high amenity cliff-top site.

The sites were also suggested to the Council during the CaSPlan Call for Sites (Aug – Oct 2014), for development by the landowner for safeguarding as openspace by members of the public. As with all sites that were suggested during this stage the Council reassessed the suitability of each of them. Following careful consideration it was agreed that some forms of development could be accommodated at Pennyland with appropriate mitigation to minimise the visual impact while also maximising public benefits. Many of the proposals are important for economic development, improving access to quality public open space and delivering strategic transport improvements.

Overall, the planning history of the site provides useful background information but the site is considered suitable for development for the reasons outlined in this document. As a result the Council are not minded to make any modifications to the Plan.

### Environmental Issues

#### *Sense of Openness*

The concerns expressed over the impact on the sense of openness in the west of Thurso are recognised. However, it is considered that certain areas of Pennyland could be acceptable if sufficient land is safeguarded to form high quality of accessible amenity spaces and areas of natural environment are protected/enhanced. Areas have been identified as Expansion to the Green Network alongside the A9/A836 with corridors running continuously through the site to the east and south. The moors at High Ormlie are an important feature but some parts have suffered from a lack of investment/maintenance and anti-social behaviour. Development of TS04 can help to improve the recreational and environmental quality of the area.

As shown in the Developer Requirements, the areas of development alongside the A9/A836, will also be expected to provide a particularly high quality of siting and design.

This will ensure that it presents an attractive entrance into the town from the west and is well integrated with the areas shown as forming part of the green network. Any developer would be required to submit a Landscaping Management Plan which will set out in detail features such as planting and maintenance of any vegetation/shrubs/trees for the site. This will ensure that any landscaping will be suitable to the weather conditions and is well maintained.

#### *Coalescence*

The objections over coalescence between Burnside and Thurso are not justified as Burnside is considered as a suburb of Thurso rather than an established or historic stand-alone community. Burnside is a relatively modern housing estate (built during the 1990s and 2000s) and has never had any facilities/services such as shops, school, post office, library or community hall. As a result the coalescence between the two areas does not raise significant planning concerns.

Despite this, the proposed Expansion of the Green Network on the section of TS04 immediately south of the A9/A836 and the proposed public park on TS12 will mean that a sufficient gap remains between the two areas to maintain a sense of openness. These areas will also serve as parts of the green network serving as a continuous green, active travel corridor from the sea, through Pennyland, to the moorland at High Ormlie and out past the golf course. No modifications are proposed to the Plan on the grounds of coalescence.

#### *Improving Amenity Value*

Other than being open agricultural fields with views across Pennyland and out over Thurso Bay the land itself has limited amenity value for residents or visitors. The Caithness Local Plan (CD17) sets out aspirations for the areas marked as 'Amenity' for enhancing the public amenity of land north and south of the A9 at Pennyland including the creation of a public park, playing field and pitch and putt course. It also noted that "where possible, the siting of all ancillary building will be rigorously controlled to ensure that the panoramic view across this area is maintained in its entirety." Over the past 15 years since the existing local plan was adopted there has been no attempt to deliver these facilities by the landowner, community or the Council. The delivery of the scheme was also not tied to any of the proposals set out in the Thurso West expansion strategy (as identified in the Caithness Local Plan or Thurso West Development Brief). The proposals set out in CaSPlan present a mechanism for achieving the delivery of greater public access to and provision of amenity space in the area.

#### *Impact on Listed Buildings*

Concerns over the impact of development on the adjoining the B-Listed Pennyland House (which includes the commemorative plaque to Sir William Alexander Smith) have already been addressed with Developer Requirements to provide a high quality siting and design and any development to be low level/density. However, to provide greater clarity and reflect other sites adjoining Listed Buildings, if the Reporter is so minded, the Council would be content with the following Developer Requirement being added: "Sensitive siting and design required due to proximity to Listed Building".

#### *Prime Agricultural Land*

Whilst this site does involve some loss of Caithness' prime agricultural land (rated 3.2 within the Land Capability for Agriculture classification), it lies close to the town centre, and

is considered the most appropriate option for strategic growth. It therefore forms a component of the settlement strategy and accords with SPP (CD01) with regard to loss of prime agricultural land. Therefore no modifications are proposed to the Plan on the grounds of impact on prime agricultural land.

#### *Development Setback*

The Expansion to the Green Network notation on the map shows that a setback from properties at Pennyland Drive will form part of the proposals for TS04. It is considered more appropriate to set the specific separation distance as part of the preparation of the Development Brief or developer led masterplan (which ever comes first). The Plan already identifies as a Developer Requirement that the houses should be a 'low level' development. Therefore no change is felt necessary to the Plan.

#### *Enhancing Wolf Burn for Wildlife and Recreation*

Concerns raised about the clarity of proposals for Wolf Burn are noted. However, the Plan identifies that as part of the development of TS04 the area along Wolf Burn should be made into a positive environmental and recreational area. On the map the notation for the Expansion of the Green Network covers a wider area to show that this is expected to be a wide corridor including not just the burn itself and the footpath. Further detail of the greenspaces and expansions of the green network will be identified as part of the proposed Development Brief or by a masterplan if it is taken forward in advance of the Development Brief. No modification is proposed to the Plan.

#### *Prevailing Wind*

The impact from the prevailing wind is considered as part of the SEA (CD07) site assessment. However it forms part of a wide range of factors which are taken into account in assessing the suitability of a site. In this case, as the site adjoins the town to the south and east the existing built environment provides some level of protection for much of the site. The site also provides an important role in the strategic expansion and delivery of improved transport infrastructure in Thurso. As a result no modification is proposed to the Plan.

#### *Ground conditions*

Concern over the unsuitable ground conditions and underground natural springs at the south eastern section of TS04 is noted. However, no evidence has been provided to back this up and it was not raised by any internal or external agency which we consulted in the preparation of the SEA Environmental Report (CD07) and the Plan itself. As a result no modification is proposed to the Plan.

#### *Archaeology*

The Council's Historic Environment Team (HET) and Historic Environment Scotland (HES) were both consulted during the preparation of the SEA Environmental Report (CD07). As some historic environment records were identified on the site a Programme of Archaeological works was included as a Developer Requirement. As a result no modification is proposed to the Plan.

#### *Protected Species*

The potential impact on protected species such as otters is recognised and a Protected Species Survey is already included as a Developer Requirement. The developer of the site will be required to provide additional appropriate information at planning application

stage to demonstrate that proposals meet the general policies set out in HwLDP (CD18), including Policy 57 Natural, Built and Cultural Heritage and Policy 63 Water Environment. In relation to concerns about 'endangered' species in Ormlie moors no modification is proposed to the Plan.

### Infrastructure

#### *Housing West of Pennyland House*

Concerns regarding the potential access from Forss Road and Castlegreen Road to serve the Housing allocation west of Pennyland House are noted. To ensure that the level of housing development is suitable the Council would be content with the existing reference in the Developer Requirements ("...accessed via Castlegreen Road or Forss Road") being replaced with the following text "Access from Castlegreen Road and/or Forss Road, with scale of development dependant upon the access arrangements that can be achieved."

#### *Access from Pennyland Drive*

The Plan identifies potential road access points to TS04 including an access south westwards from Pennyland Drive. This is only indicative and a Transport Assessment will be required to inform the final road layout. Should a road access to be taken from Pennyland Drive, resulting in the removal of the existing children's play park, then a new facility of equal or better quality would be required nearby to meet Policy 75 Open Space in HwLDP (CD18). As a result no modification is proposed to the Plan.

#### *Impact on Residents of Rockwell Crescent*

The impact on neighbouring residents was considered as part of the site assessment process. As the area between Rockwell Crescent and the Business Park slopes downwards from the existing houses development should not impinge on daylight levels of neighbouring residents. Amenity issues such as these will also be addressed in further detail at planning application stage and possibly at Development Brief/masterplan stage. Therefore no modification is proposed to the Plan.

### Other Issues Raised

#### *Social Problems Resulting from Housing Developments*

Public sector housing developments from around the 1960s and 1970s, such as at Pennyland, were often large, single tenure estates which have since been shown to lead to certain social issues. However, new housing developments are designed to provide sustainable communities where there is mix of house types and tenures and residents have appropriate access to facilities and amenities that help bring communities together and reduce social problems.

#### *Redeveloping Brownfield Land*

The Council supports the principle of redeveloping brownfield land and promotes, where possible, suitable brownfield development opportunities. The Plan aims to reduce the pressure on greenfield sites and achieve regeneration by identifying key brownfield sites, such as TS06, TS07, TS08 and TS09, and directing development to town centres. However, due to the potentially high additional costs involved some greenfield sites need to be identified to ensure that important investment in the area is not discouraged and in order to provide sufficient supply of land and range of development opportunities.

#### *Promoting Town Centre Development*

The Town Centre First Policy seeks to direct all significant footfall generating uses towards

designated town centres. The policy also supports the conversion of buildings providing there is no loss of existing or potential viable footfall generating use. The Plan recognises that it is not appropriate or feasible to direct all housing or commercial development to town centres. As a result the Plan allocates land outwith the town centre.

#### *Impact on Private View*

Whilst the Council consider the impact on neighbouring residents, the right to a private view is not a material consideration in the planning system. Due consideration will be given at the planning application stage to any impact on residential amenity, through the HwLDP (CD17) general policy 28 Sustainable Design and at the Development Brief/masterplan stage. As a result no modification is proposed to the Plan.

See Issue 6 Environment and Heritage for the response to the request for Pennyland to be designated as a Special Landscape Area.

### **Other Concerns**

#### *Implications of an Allocation in the LDP*

It is not the case that should a site be allocated in the Local Development Plan a developer would be automatically granted outline planning. Although the allocation in the Plan does show that the Council would support in principle the allocated land uses a developer would still be required to submit an application, either for planning in principle or a full planning application. Interested parties, including the general public, would then have the opportunity to make comments on the application.

#### *Indicative Housing Capacity*

The 20 house allocation next to Pennyland House was included in the total allocated housing land figure shown in the Growing Communities section (paragraph 20). However was recognised that the indicative housing capacity figure shown in the Proposed Plan for TS04 (180) only included that for the Housing component south west of Pennyland Drive. The total figure for TS04 should have been 200. This error was corrected as a non-notifiable modification at Modified Proposed Plan stage. No comments were made during the Modified Proposed Plan consultation in relation to this change.

#### *Protecting Wolf Burn Water Quality*

The site is upstream of the recently constructed Wolf Burn Distillery which takes its water from the burn. Therefore, to protect the integrity of the distillery business, if the Reporter is so minded, the Council is content for the suggestion made by SEPA to be made, namely to add the following developer requirement: "The Wolf Burn should be protected by a 25 metre development exclusion buffer. Note that discharges to this watercourse are unlikely to be acceptable".

#### *Incorrect Site Referencing*

The site references, as shown in the Proposed Plan, included within the Developer Requirements for TS04, TS12 and TS14 were recognised as being wrong shortly after the consultation started. The errata for the Proposed Plan noted this error and included the correct site referencing (referring to TS04, TS12 and TS14 rather than TS01, TS02 and TS03). The error was corrected as a non-notifiable modification at Modified Proposed Plan stage (which also included the removal of the sites TS12 and TS14 from the Plan).

No further comments were made on the site references during the consultation on the Modified Proposed Plan.

#### *South Western Boundary of TS04*

The south western boundary of TS04 takes a slightly tighter line than that identified as part of the existing Thurso Western Expansion Area Development Brief (2003) (CD23). As a result it excludes a small section of the field adjoining Ormlie moors which was previously allocated. Although this section of TS04 is identified for Long Term Housing the site forms part of the wider strategic expansion of Thurso and is expected to be developed in the future. However, if the Reporter is so minded the Council would be content for the boundary to be moved outwards to include the whole field. This would provide greater clarity over the extent of development supported and better reflect the existing Development Brief (2003) (CD23) and subsequent planning permission (now lapsed).

#### *Other Land Uses Suggested*

Retail is not considered to be a suitable use as part of the Mixed Use allocation TS04 as it does not accord with the Town Centre First Policy which directs all significant footfall generating uses towards the town centre. Given the topography and prominent nature of the land south of the A9 large retail development would also have a significant impact on the landscape. The Council do not propose to modify the Plan to include Retail as one of the uses.

An additional Hotel allocation near the Business Park is also not supported as it is arguably a less appealing location for attracting a quality hotel given the adjoining uses and a more restricted view. If a budget hotel was to take the site forward then it could present significant direct competition with town centre hotels. The Council do not propose to modify the Plan to include Hotel as one of the uses.

#### *Scottish Water*

The request for the Council to make Scottish Water aware if and when potential non-domestic usages are known on the sites is noted. In terms of a similar study to accompany a contamination survey prior to connection to the water supply, this is the responsibility of the developer and Scottish Water. No modification proposed to the Plan.

### **Planning Authority's consideration of representations on the Modified Proposed Plan in February 2017:**

#### **TS04 – Thurso West**

On the 31<sup>st</sup> August 2016 in agreeing the response to comments on the Proposed Plan the Caithness Committee considered options for site allocations TS04 Thurso West alongside TS12 East of Burnside for Community and TS14 Land West of Caravan Park for Business. Please see Issue 12 for details on the options considered by Committee relating to Thurso sites TS04, TS12 and TS14. For TS04 the Committee agreed to retain the site as a single allocation as shown within the Proposed Plan rather than to separate TS04 into its key components on the Proposals Map.

Many of the points raised during the Modified Proposed Plan consultation were considered

and the response agreed by Committee on 31 August 2016 still applies. We did not therefore reconsider these issues again here. Instead, below is a summary of the new issues raised during the Modified Proposed Plan consultation and the Council response:

#### *Allocate the Long Term Sites/Expand Range of Uses*

A large number of representations were made which are supportive of the principle of development at Thurso West but object to aspects of TS04, and more specifically the land west of Pennyland House, requesting that the whole site is allocated for development within the Plan period and that the range of allocated uses should be expanded. The Plan, however, already identifies a range of development opportunities in Thurso including land for major business development adjacent to the existing Thurso Business Park and retail and office opportunities within the town centre, at the former mart and sites along the riverside. The Plan also allocates land with indicative capacity totalling 363 houses on a number of different sites in Thurso within the Plan period.

With reference to requests for Retail to be added to the mix of allocated uses for TS04, the Council does not consider the site and more specifically the land west of Pennyland House, suitable for such uses. As outlined in Policy 1 Town Centre First of CaSPlan, significant footfall generating uses such as Retail are directed towards town centres. Proposals for significant footfall generating retail uses which are outwith town centres must produce a retail impact assessment to demonstrate that there would be no adverse impact on the vitality or vibrancy of the town centre. No such evidence has been submitted in support of the request that Retail is added to the mix of uses. Whilst the Long Term status of land west of Pennyland House indicates that the Council considers that some development may be accommodated on the site the Plan is clear that it is housing development that is being referred to as opposed to large retail units which could have a significant impact on the landscape.

In reference to more specific requests for the inclusion of a proposed supermarket within allocation TS04, this was an issue posed at Main Issues Report stage and it was apparent that there was no significant desire within the community or developer interest in such a proposal. At no stage in the CaSPlan preparation process have we received any formal representations from a supermarket retailer interested in developing land at Pennyland. Comments made to the Modified Proposed Plan have not raised substantial rationale or evidence that demonstrate that there is need for a new supermarket in Thurso. Furthermore, Lidl have recently expanded their store at Pennyland to almost 1,350m<sup>2</sup> in sales area and the former mart site, which remains the preferred choice over Pennyland, has a current application pending consideration for two retail units on the site.

As highlighted above, a range of commercial and housing development opportunities have already been identified within the Plan for Thurso and the Council is not minded to expand the range of uses or bring the Long Term area forward as an allocation. As a result no change is proposed to allocation TS04.

#### *Separation of TS04 into Separate Components*

With reference to requests that site TS04 should be separated into its component parts, it is considered that it is best taken forward as a single allocation as it would better reflect the extent covered by the forthcoming review of the Thurso Western Expansion Area Development Brief (2003) (CD23). During the preparation of the Development Brief or at future plan reviews the suitability of development can then be assessed and the potential

mix of development across the site can be identified. This position was agreed by Councillors as part of the Proposed Plan and reaffirmed at Caithness Committee in August 2016. As no reasons were provided to challenge this position we therefore do not propose any amendments to allocation TS04.

#### *Decision Making for Sites West of Pennyland House*

Following consideration of the representations at the Proposed Plan stage it was not considered necessary to include the removal of the sites west of Pennyland House as one of the options suggested to the Committee. The Committee was not limited to considering the options outlined in the report. The Council's agreed position is the inclusion of this area within TS04 and as a result no change is proposed to the allocation.

#### *Setting Appropriate Mitigation*

Concerns raised over the sensitivity of the site are recognised, however, the Plan sets out a range of mitigation to minimise the visual impact from development on TS04. This includes expansion areas for the green network, a buffer strip of at least 30 metres along the A836, high quality siting and design especially around more prominent areas; and requiring the housing development west of Pennyland House to be low level/density. These Developer Requirements identified in the Plan are considered sufficient to mitigate any potential impacts. Therefore no change is proposed to allocation TS04.

#### *Enforcement of Development Requirements*

The Council's Development Plan is of particular importance when making planning decisions. When the Council deals with planning applications for proposed development it has regard to the Development Plan (comprising Local Development Plans and Supplementary Guidance) and material considerations. The Highland Council's area local development plans set out site allocations including any Developer Requirements which need to be addressed (see the CaSPlan Glossary for more information) either as part of the application or set out in the conditions. The law states that unless material considerations indicate otherwise, an application is to be determined in accordance with the development plan. Therefore, no change is proposed to allocation TS04.

#### *Pennyland Landowner and Asda Proposal*

In relation to the point raised about the landowner of Pennyland and Tulloch Homes enticing Asda from pursuing the mart site, the private negotiations and commercial decisions made between private companies, developers and landowners is not a material consideration. The purpose of the Development Plan is to identify effective development sites and suitable land uses. As a result no change is proposed to allocation TS04.

#### *Lack of proper assessment of alternative sites*

The Council disputes the claim that sites in Pennyland were identified as the key growth area while other sites were unjustly eliminated. Through the preparation of the Main Issues Report and as part of the SEA process each site was assessed both individually and in combination with others to identify the general strategy for Thurso and which sites were most suitable to be allocated for development. As a result no change is proposed to allocation TS04.

#### *Pennyland turning area*

The turning area opposite the Weigh Inn was created to allow for HGVs to more easily transport wind turbine components from the harbour to development sites. As this section



of TS04 is identified for Long Term potential development there is no threat to the turning area during the plan period. Should the site be recommended for allocation in future plan reviews and the turning area is still required then a Developer Requirement can be added to protect/formalise it as part of the development proposals. As a result no change is proposed to allocation TS04.

*Bottleneck at Ormlie Road/Provost Cormack Drive*

The access point from Provost Cormack Drive will serve development at High Ormlie until the distributor road which will connect to the A836 is delivered. As part of the Developer Requirements for TS04 a Transport Assessment will need to be carried out which will address concerns regarding impacts on the road network. As a result no change is proposed to allocation TS04.

*Further opportunities for public consultation*

Opportunities for future public engagement and consultation on development proposals for TS04 were discussed at the Caithness Committee in February 2017. It was noted that consultation would be a statutory requirement as part of the preparation of a development brief (as Supplementary Guidance) or developer-led masterplan (as part of pre-application consultation for major development). However, to make this requirement more explicit and to encourage engagement with the community, if the Reporter is so minded, the Council would be content with additional text (shown in italics below) being added to the definition of a 'masterplan' in the glossary (page 126): "A document that explains how a site or series of sites will be developed. It will describe how the proposal will be implemented, and set out the costs, phasing and timing of development. A masterplan will usually be prepared by or on behalf of an organisation that owns the site or controls the development process. *Those preparing masterplans should engage with the Council from the outset and hold effective and meaningful public consultation which informs the content of the masterplan*".

**CONCLUDING REMARKS**

Although there was a relatively large number of comments on site allocation TS04 Thurso West during the Modified Proposed Plan consultation, no new issues or substantive evidence were raised which warrant the Council making amendments to the Plan. Furthermore, the Council is not seeking to propose any additional suggestions of amendments to the Plan for the Reporter to consider.

**Reporter's conclusions:**

**Reporter's recommendations:**