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Issue 7	CASTLETOWN	
Development plan reference:	Castletown, page 23 - 26	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Angus Cowap (970363) Audrey Young (979993) Caithness Chamber of Commerce (983321) Eddie Todd (978135) George Campbell (979545) Gina Grunskis (980243) Heather Calder-Macphee (977117) Neil Redgate (978151) Paul Vincent Tait (979013) Scotia Homes Ltd (909099) Scottish Water (953627) SEPA (906306) Susan Parmenter (981495) Wendy Shearer (978313)</p>		
Provision of the development plan to which the issue relates:	Castletown settlement text, placemaking priorities and site allocations.	
Planning authority's summary of the representation(s):		
<p>Castletown General <u>Angus Cowap (970363)</u> Greater clarity over the plans for green corridors, particularly the possibility of connecting Thurso and Castletown by off-road shore line cycle and walking route as articulated in the Prince's Regeneration Trust Masterplan of 2007 to facilitate access to the leisure and tourism assets of Castlehill Policies, Harbour, Heritage Centre, Beach, Dunnet Bay and forest by families on cycles and foot rather than motor vehicles.</p> <p>Provision of WC facilities near the small parking area at the western end of the beach as none exists at the moment for visitors.</p> <p>Improvement/maintenance works to footpath along dunes Dunnet Bay beach, at moment you have to walk some parts along A836 road due to degradation</p> <p>Application for clean beach accreditation</p> <p><u>Neil Redgate (978151)</u> Respondent argues that the Plan is 'incomplete' and 'not fit for purpose' due to the Plan not showing the sites which were not taken forward from the Main Issues Report, i.e. MIR site refs CT05, CT10 and CT12.</p> <p><u>Caithness Chamber of Commerce (983321)</u></p>		

Respondent has clicked Object but stated “We have no specific comments on any of the proposals or priorities.”

CT01 – Land North of Harland Road (Long Term Housing site)

Heather Calder-Macphee (977117), Eddie Todd (978135), Wendy Shearer (978313), Neil Redgate (978151), Paul Vincent Tait (979013), Audrey Young (979993), Gina Grunskis (980243), Susan Parmenter (981495)

Objects to the inclusion of the long term housing site for one or more of the following reasons:

- The eastern boundary does not fit any natural or existing boundaries and would be a hard and ugly boundary to the village.
- No demand for additional housing in Castletown, more housing will reduce house prices in the area. Many houses currently on the market.
- There are better alternative sites in village and planning permission exists for 48 houses in other areas of the village.
- Lack of employment opportunities to attract/retain people, e.g. Dounreay, oil sector.
- The noise, pollution and general disruption would compromise residents quality of life as well as potentially decrease the value of neighbouring property.
- Taking access from Harland Road and increased traffic levels will make it more dangerous for children. The new road layout would be used inappropriately by boy racer and could be used as a rat run. The access point is already tight and busy with traffic. The access proposed from Harland Road would impact on residents who currently take access from and park their cars along this part of the road.
- CT01 does not fulfil the first placemaking priority on promoting opportunities for redevelopment, infill within the village centre and brownfield sites. It does not protect the farmland and woodland landscape of the village.
- It would result in piecemeal development
- There have been regular flooding issues on certain parts of CT01
- The land at CT01 is a haven for wildlife and provides a corridor between the woodlands. The green corridors are insufficient and development would damage the ancient/long established woodland at Burns of Strangergill and Garth.

Other concerns raised include:

- about the timescales of development,
- extent of greenspace setback from the existing houses; and
- why not all residents in Harland road received the neighbour notification.

Neil Redgate (978151)

The boundary of the SDA has been drawn up incorrectly with respect to Burn of Garth woodland. It cuts across the woodland on the south east side of the settlement whereas the woodland extends northwards to the small power cable exchange building. If this was included within the SDA then the parameters of CT01 would have been different.

No explanation has been made in the Plan for CT01 being included as a long term housing site.

A better site would be to the east of Harland Road as it fits with the infill requirement and minimises impact on the woodland connectivity. This is a much smaller plot of land tucked away, on level ground, not prone to flooding and also falls within the existing field boundaries.

Another plot of land suitable for infill is the farmland, on the south side of B876, between the Primary School and former surgery and connects the village (and school) to the disjunct group of houses at the edge of the village boundary. It also is neatly defined by existing field boundaries.

Any housing in the CT01 area would impact on the mental health and well-being of respondent's wife. She does not leave the house very much and relies on and enjoys the wide open views of woodland, coastline, dunes and farmland.

Scottish Water (953627)

Although the site has been designated as Longer Term site, Scottish Water would recommend that any current or prospective developers interested in delivering the site, to make contact with Scottish Water as early as possible to understand any specific infrastructure of investment requirements required by either party.

CT02 – Castlehill Steading and CT06 – Land at Shelley Hill

George Campbell (979545)

The client, who owns the land between Castletown and Castlehill has supported planned development of the land since the drafting of the Caithness Local Plan. Scotia Homes subsequently purchased land near the steading for development. They received planning permission in March 2013 for 28 new build houses and conversion of the steading. Scotia Homes also have an option to purchase adjoining land for further development.

Respondent objects to the provisions of the Plan for the Castlehill/Shelley Hill area of Castletown insofar as they do not accurately reflect the:

- (a) agreed Castletown Master Plan;
- (b) adopted Highland wide Local Development Plan;
- (c) Main Issues Report of the CaSPlan; and
- (d) development approved under 11/00403/FUL.

A. Agreed Castletown Master Plan. The Castletown Village Masterplan is endorsed in the Highland wide Local Development Plan, notably in Policy 26. The phasing plan shown in the Masterplan is not fully reflected within the Plan. The masterplan shows Phase 1 including Castlehill Steadings and associated quality new build (OPA granted) 40-50 new houses, plus conversion/re-use of steadings." However, the Plan allocation CT02: Castlehill Steading only allocates land with a capacity for 28 houses, as per the new build element of the permission granted under 11/00403/FUL. The agent considers that the inclusion of additional land for potential development of "40-50 new houses, plus conversion/re-use of steadings" in the Plan period would be more in keeping with the Masterplan.

In relation to Phase II:

- (1) Part of the Phase I land at Castlehill is indicated for longer term development in the Plan.

- (2) The north eastern and south eastern parts of the Phase II land adjacent to the existing village do not form part of the longer term mixed uses area under CT06 in the Plan.
- (3) Not all of the eastern (Later Phases) section of the development land in the open field south of Castlehill is included in the CT06 area.
- (4) The desired Place-making Priority of a better connection of the village with Castlehill and the harbour from the centre of Castletown is shown in conjunction with the long term potential for mixed use expansion. However, the Masterplan phasing plan clearly shows this as part of Phase I.
- (5) Most of the route of this link will serve as a vehicular access for development on both sides. As such it would generally be constructed in conjunction with the phased development of land extending both from the village and Castlehill directions, indicated as Phases I and II in the Masterplan. Earlier completion of the whole link in advance of adjacent longer term development will depend on farming operations either side.

B. The Council's intention "to adopt the guidance following consultation and possible amendment as supplementary guidance to this plan". As the Proposed Local Development Plan is not consistent with the guidance contained in the Castletown Masterplan it does not comply with the Highland wide Local Development Plan.

C. The MIR fully embraced the Castletown Masterplan. It is noted that in response to the comments received on the MIR the Council agreed that the amount of land allocated in the Masterplan was too much and the growth rate was too optimistic. However, the Proposed CaSPlan, in attempting to split up the overall allocation into Plan period and longer term development areas key parts of the Masterplan land have been left out altogether with little thought to the practicalities of how the land at Castlehill and Shelley Hill can be developed. In addition, Scotia Homes Ltd recently submitted a further planning application to renew the permission granted at Castlehill in March 2013. The respondent believes that the commencement of development of this land within the Plan period will help generate interest in further development over nearby land. The CaSPlan needs to remain flexible and allocate the additional land in a manner that is more in keeping with the agreed Masterplan.

Comments specific to CT02: Castlehill Steading:

- (1) This allocation shown on the Castletown Inset Map does not accurately reflect the area granted planning permission in March 2013 under 11/00403/FUL. The southern boundary of this approved development site is actually a bit further south than indicated in the Inset Map. The "Site Access" arrow is not in the location of the approved main access to the site.
- (2) The application was for 28 new build dwellings plus a further 6 through conversion/restoration of the steading to the north. The indicative housing capacity should therefore be for more than 28 dwellings.
- (3) The 3.9 ha. of allocated land extends well beyond the boundaries of the area granted permission into the area of the demolished Castlehill House and its immediate environs. To avoid confusion and reflect the additional development potential indicated in the Castletown Master Plan, it is suggested that the land not covered by the 11/00403/FUL permission should form a separate allocation for mixed use.
- (4) The approved development area should be a stand alone allocation but for housing. Apart from the retail ground floor use approved on one of the plots, the development

is in all other respects residential.

- (5) The allocation should also exclude the Heritage Centre, which is an existing use in part of the Castlehill steading.
- (6) Whilst a Tree Protection and Management Plan together with a protected species walkover survey are developer requirements, the existing allocation does not specifically safeguard the woodland between the former Castlehill House site and the open field to the south. This area should therefore be indicated as Green Space.

Comments specific to CT06: Land at Shelley Hill

- (1) This allocation does not accurately reflect the Castletown Masterplan. Whilst the blanket allocation indicated in the Main Issues Report (CT01) is not requested, in breaking this down into smaller allocations the Plan should at least have accounted for the key development areas and components of the Masterplan.
- (2) No account is taken of the potential for development immediately adjacent to Castletown that replicates part of the grid pattern of the existing village.
- (3) The boundaries of the allocation should also account for the single plot depth development potential either side of the proposed avenue to connect the village to the harbour.
- (4) The allocation should also extend to the edge of the woodland on the eastern side and not leave a narrow triangle of ground, which would be difficult to cultivate if retained in agricultural use.
- (5) As indicated at 4.2 above, the approved Scotia Homes site at Castlehill is the subject of renewed interest. Whether or not development of this area commences in the short term, it is considered that additional land that allows for a choice of housing sites and complements this higher density form of development within the Plan period is an omission from the Plan.
- (6) It is requested the inclusion of the strip of land immediately north east of the village edge, in line with the Castletown Masterplan. In addition to meeting shorter term local demand for medium density housing development close in to the village and existing amenities, the western part of this land has more potential for additional uses such as a residential care home.
- (7) The longer term allocation of all of this land, as indicated in Plan CT06 allocation, will hinder such demand being met. This in turn will place more pressure on the surrounding countryside for un-planned single house developments that are often at odds with the settlement pattern and continued farming operations on adjacent land.
- (8) The upper and lower parts of this field can be serviced by existing infrastructure, notably drainage and roads without prejudicing the connecting development strip and avenue in the longer term. It would be more cost effective for these areas to be connected by gravity to the existing foul drainage system than CT03, which requires the pumping of effluent.
- (9) The eastern part of the strip of land, north east of MacKay Street offers potential for further housing, perhaps beyond the Plan period.
- (10) There is also scope to include provision for amenity open space and/or allotments between the existing built up area and new development.
- (11) The potential to form vehicular accesses at each end of this land, consistent with the Castletown Master Plan, should be indicated. This will allow development to progress in the event that the current open area of land adjacent to MacKay Street is not made available or its use as a vehicular access is objected to. In this latter regard the Community Council had expressed concerns in response to the Main Issues Report.

(12) Development of the field either as indicated in the Plan or in the manner now requested will leave two smaller fields. These would not be viable to retain in agricultural use in the longer term. However, until the land is developed retaining it in agriculture is the best way of managing it in the interim. The indication for expansion of the 'green network' would be appropriate but it is suggested that the Plan is more specific about the range of potential future uses such as open space for formal and informal use and community allotments.

The respondent provided an attached plan of Castletown illustrating the requested modifications.

Scotia Homes Ltd (909099)

Scotia Homes Ltd objects in relation to specific proposals at Castletown and respectfully requests modifications to the allocations at CT02: and CT06: Land at Shelley Hill, both in relation to the settlement text and to the boundaries of the allocations.

It is considered that the allocations in the Proposed CaSPlan fail to accurately reflect the planning history of land at Castlehill and are inconsistent with both the development plan context for Castletown and the Castletown Village Masterplan, 2007. The following modifications are suggested having regard to this context, which is set out in further detail below.

Scotia Homes object to the boundaries of both CT02 and CT06 and would suggest the following modifications are made to the designations:

- CT02: Castlehill Steadings should be divided into two sites, that is, CT02A: Castlehill Steading Phase 1 and CT02B: Castlehill Steading Phase 2. Site CT02A should reflect the boundary of Planning Permission Ref: 11/00403/FULL, illustrated as Site 1 in Figure 1 above. This boundary could also take in the heritage visitor centre. Site CT02B should incorporate within its boundary the second phase to this approved development, together with the creation of a connecting access road from Castlehill to Castletown, illustrated as Site 2 in Figure 1 above.
- CT06: Land at Shelley Hill should be extended to include land to the east and west, illustrated as Site 3 in Figure 1 of the attachment, with future development guided through a more detailed masterplan for the site.

The supporting text should be amended as follows:

- CT02A: Castlehill Steading Phase 1 should be identified with an indicative housing capacity of 34 on an area of 1.7 hectares to reflect the planning approval on the site, which now contributes to the effective housing land supply. The site should be designated for 'housing' not 'mixed use' development, again to reflect the planning consent for the site, which comprises only 1 no. commercial unit.
- CT02B: Castlehill Steading Phase 2 should be identified with an indicative housing capacity of 35 on an area of 1.5 hectares, with developer requirements similar to CT02, but also including a requirement to deliver the road connection to Casteltown.
- CT06: Land at Shelley Hill, which extend to approximately 14.5 hectares (including to road corridor), should be brought forward into the period of this CaSPlan and the reference to 'long term' removed. The supporting text should incorporate a requirement that development of this land will be guided through a masterplanning process, having regard to the Castletown Village Masterplan, 2007, allowing

flexibility on the future boundary for built development and green networks.

The main reasons for these suggested modifications include:

- Planning history - Planning Permission (Ref: 11/00403/FUL) was granted in 2013 for the conversion of the existing derelict steading to provide 6 no. residential units, the erection of 28 no. new residential properties, including a mix of flats and houses, together with a 1 no. commercial (shop) unit. The application submission and Design and Access Statement clearly identified that the application formed Phase 1 of the development at Castlehill Steadings and that Phase 2 would continue on land to the east. Phase 2, together with the connecting access road to future mixed use development, was approved as a drawing by Highland Council. An application for the renewal of this permission was lodged in February 2016 (16/00927/FUL). In addition, the Highland Housing Land Audit 2014 allows for 16 units at Castlehill Steading and 29 units on land to the south allocated in the adopted Local Plan for up to 25 units. It is considered that the planning history relating to this site and the clear commitment to its delivery by Scotia Homes Ltd, supports the allocation of Site 1 and Site 2 identified in Figure 1 for housing development in the period covered by this CaSPlan.
- A further commitment to the allocation of land to the north of Castletown, on land identified as Site 3 in the attachment, in the period covered by this CaSPlan, is also supported on the basis that this land forms an intrinsic part of the overall Masterplan vision for Castletown, with the connecting road offering the opportunity to secure further housing along its route together with some additional housing to the north of Castletown, again in accordance with the Masterplan vision for the area.
- Development Plan context - Caithness Local Plan (2002) illustrates that Sites 1 and 2, are allocated for housing and CaSPlan should reflect this site specific allocation and increase the capacity of the site to reflect the consented layout for 29 houses and the additional capacity for a further 35 houses.
- Policy 26 of the HwLDP supports the delivery of the Castletown Masterplan. CaSPlan is not consistent with the Castletown Village Masterplan and therefore conflicts with the requirements of the HwLDP. Paragraph 17.8.2 of the Highland Wide Local Development Plan (HwLDP) confirms that the Masterplan for Castletown (Map 16) will provide a framework for considering proposals in advance of the new Area Local Development Plan being prepared.
- The HwLDP had anticipated possible amendments to this guidance, following consultation, and although this revision has not taken place Policy 26 identifies a number of principles to be established within this future masterplan. Key principles relevant to these sites include protecting and enhancing the character of the village, establishing a stronger connection between Castletown and Castlehill and setting out phasing as a guide to growth and providing a clear steer on the direction(s) and emphasis for long term growth proposals. It is considered that both the proposals map and text, relating to Shelley Hill, are too prescriptive and that the location of new development and its phasing should be guided by the Masterplan and amendments to it, rather than through the designations in the Proposed CaSPlan, which may preclude the delivery of the key principles of Policy 26
- The land in Scotia Homes' ownership and control illustrated in Figure 1 forms an integral part of the vision identified in the Masterplan for Castletown prepared by the Princes' Foundation for the Built Environment and The Prince's Regeneration Trust, as part of the North Highland Initiative. The proposals within the Masterplan are underpinned by the Enquiry by Design (EbD) Process undertaken for Castletown in

the summer of 2007. The report provides a future vision for Castletown, based on a regeneration and heritage action plan, with the completed Masterplan illustrated in Figure 7: Enquiry by Design Completed Masterplan. In order for CaSPlan to be consistent and accord with both Policy 26 and the Masterplan, it is considered that residential development, should be allocated in accordance with the completed Masterplan

- Proposed CaSPlan, may not be the most appropriate and it is suggested that the nature of the allocation requires further reconsideration or justification through a masterplanning process, not least the splitting up of the field, leaves divorced parcels of land on either side which would have an adverse effect on the ability to farm this remaining land.

Angus Cowap (970363)

Respondent is at an advanced stage of purchasing the western part of CT02. Objects to the proposed paths shown as crossing the middle of CT02 east to west and north to south as this would negate the development of this particular small space for mixed use. A better route would be to take the path through a gap in the stone wall at the western edge as shown rather than straight through the middle of the only usable structure on the site the old stone built vaulted harbour frontage. Understands that a Programme of Archaeological Work and Tree protection and Management plan has already been carried out on this site.

SEPA (906306)

The northern boundary of CT02 is adjacent to the Coastal Flood Map and a small watercourse runs through the south east section of the site. Parts of the site are therefore at risk of flooding. As a result we object unless the following developer requirement text is added: "Flood Risk Assessment (no development in areas shown to be at risk of flooding)." This amendment will help protect people and property from flood risk and ensure (1) compliance with the flood risk avoidance position in paragraphs 255 and 263 of Scottish Planning Policy, (2) that developers are aware that flood risk may be a constraint on development of part of the site which will assist in delivery in line with Scottish Planning Policy paragraph 30, which states that "Development plans should:...set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achievable" and (3) ensure that developer requirements for all sites thought to be at risk of flooding are dealt with consistently throughout the plan. This advice is also in line with the Flood Risk Management (Scotland) Act 2009 which places responsibility on the Scottish Government, SEPA, Scottish Water and local authorities to exercise their flood risk related functions with a view to reducing overall flood risk. It will also ensure that the mitigation outlined in the Environmental Report is delivered in the Plan.

Scottish Water (953627)

Although CT06 has been designated as Longer Term site, Scottish Water would recommend that any current or prospective developers interested in delivering the site, to make contact with Scottish Water as early as possible to understand any specific infrastructure of investment requirements required by either party.

CT03 – Former Castlehill Gardens

Scottish Water (953627)

Due to the potential requirement for a pumped water supply in relation to the site topography, it is recommended that any developer progressing with the site makes contact

with Scottish Water Customer Connections to determine the specific requirements in line with what is being built.

SEPA (906306)

A small watercourse runs through the site. There are groundwater features in close vicinity of the site which may indicate a shallow water table and potential for groundwater flooding. Parts of the site are therefore at risk of flooding. As a result we object unless the following developer requirement text is added to the plan: "Flood Risk Assessment (no development in areas shown to be at risk of flooding)." This amendment will help protect people and property from flood risk and ensure (1) compliance with the flood risk avoidance position in paragraphs 255 and 263 of Scottish Planning Policy, (2) that developers are aware that flood risk may be a constraint on development of part of the site which will assist in delivery in line with Scottish Planning Policy paragraph 30, which states that "Development plans should:...set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achievable" and (3) ensure that developer requirements for all sites thought to be at risk of flooding are dealt with consistently throughout the plan. This advice is also in line with the Flood Risk Management (Scotland) Act 2009 which places responsibility on the Scottish Government, SEPA, Scottish Water and local authorities to exercise their flood risk related functions with a view to reducing overall flood risk. It will also ensure that the mitigation outlined in the Environmental Report is delivered in the Plan.

CT05 – Former Free Church, Main Street

George Campbell (979545)

A path is indicated connecting Main Street with the former flagstone quarry/landfill area towards Castlehill. Please be aware that just beyond the north eastern boundary of this allocated site there is a steep drop into the former quarry. This currently presents a danger and therefore the formation of a path in this location is not advisable.

Modifications sought by those submitting representations:

Castletown General

Angus Cowap (970363)

Greater clarity on green corridors, particularly an active travel link connecting Thurso and Castletown.

Inclusion of toilet facilities at the western end of Dunnet Beach

CT01 – Land North of Harland Road (Long Term Housing site)

Heather Calder-Macphee (977117), Eddie Todd (978135), Wendy Shearer (978313), Neil Redgate (978151), Paul Vincent Tait (979013), Audrey Young (979993), Gina Grunskis (980243), Susan Parmenter (981495)

Removal of CT01 from the Plan

Neil Redgate (978151)

Land east of Harland Road to be identified as a long term housing site (before CT01). Another alternative site is west of the primary school.

CT02 – Castlehill Steading

Angus Cowap (970363)

Removal of the proposed paths shown as crossing the middle of CT02 east to west and north to south. An alternative is proposed through a gap in the stone wall at the western edge of the site.

Removal of Developer Requirement for an Archaeological Work and Tree protection and Management plan

SEPA (906306)

Add the following developer requirement “Flood Risk Assessment (no development in areas shown to be at risk of flooding).”

CT02 – Castlehill Steading and CT06 – Land at Shelley Hill

George Campbell (979545)

Better reflect the phasing strategy as shown in the Castletown Masterplan.

An alternative plan is proposed (see agent’s attachment) which sets out land uses and access points.

Separate CT02 to reflect the two different land ownerships – Scotia Homes Ltd and Castlehill Policies.

Enlarge the allocation to include the full extent within Scotia Homes Ltd ownership which also reflects the live planning permission 11/00403/FUL. Also increase the indicative housing capacity and amend location of the Site Access point to reflect the planning permission. Change Scotia Homes Ltd site from Mixed Use to Housing only. Remove the Heritage Centre from the allocation.

Include reference to the Council’s intention to “adopt the guidance following consultation and possible amendment as supplementary guidance” to be consistent with HwLDP.

Remove the woodland between the former Castlehill House site and the open field to the south from the allocation and identify as Greenspace. Remove the developer requirement for a Tree Protection and Management Plan and species walkover survey (assumed).

Scotia Homes Ltd (909099)

Separate CT02 to reflect the two phases set out in the planning permission 11/00403/FULL and the connecting access road from Castlehill to Castletown.

Castlehill Steading Phase 1 should be identified with an indicative housing capacity of 34 on an area of 1.7 hectares to reflect the planning approval. The site should be reallocated as Housing rather than Mixed Use.

Castlehill Steading Phase 2 indicative housing capacity for 35 on an area of 1.5 hectares, with developer requirements similar to CT02, but also including a requirement to deliver the road connection to Casteltown.

CT06 should be allocated for development within the Plan period and enlarged to include all the land at Shelley Hill (as shown in the MIR)

The Castletown Masterplan in order to guide new development should be amended as necessary and then adopted as supplementary guidance.

The Plan should be more specific about the potential future uses of the area shown as Expansion of the Green Network.

CT03 – Former Castlehill Gardens

SEPA (906306)

Add the following developer requirement “Flood Risk Assessment (no development in areas shown to be at risk of flooding).”

CT05 – Former Free Church, Main Street

George Campbell (979545)

Remove the “Proposed Path” between Main Street and the former flagstone quarry/landfill area towards Castlehill.

Summary of responses (including reasons) by planning authority:

Castletown General

Thurso and Castletown are located along the North Highland Way which is an unofficial walking route from John O Groats to Cape Wrath. Although the Council recognises the potential recreational and tourism benefits of enhanced connections and long distance travel routes there are no plans to formalise it at present. The comment has been passed to the Council’s Access Officer for consideration. No modification is proposed to the Plan. Although new toilet facilities would be desirable, existing toilet facilities are provided on a seasonal arrangement towards the eastern end of the beach. Given the reductions in the Council’s budget (CD38) for public conveniences from £1.233m to £639k by 2018 it is unlikely that new toilet facilities will be built on the western side of the beach.

The submission of an application for clean beach accreditation is not a planning issue.

The comment that the Plan is ‘incomplete’ and ‘not fit for purpose’ due to it not showing all the Main Issues Report (MIR) (CD04) sites is incorrect. The MIR is a discussion document intended to show all the site options which were made available at that time, including all those submitted during the Call for Sites process. The Proposed Plan is considered as the settled view of the Council, and sets out the agreed vision, strategy and site allocations.

CT01 – Land North of Harland Road (Long Term Housing site)

Planning context

The existing Caithness Local Plan (2002) (CD17) identifies the land north of Harland Road as the main expansion area for Castletown. Potential development sites in Castletown were reassessed as part of the preparation for The Prince’s Trust Castletown Masterplan in 2007 (CD26) which aimed to formalise a vision and strategy with engagement and consultation from the local community. Policy 26 in the Highland-wide Local Development

Plan (HwLDP) (CD18) provided weight to the masterplan stating that it would provide a framework for considering proposals in advance of the new area Local Development Plan.

Given this context the Castletown Masterplan formed the basis of the preferred strategy set out within the MIR with preferred sites at both Shelley Hill and north of Harland Road. The results of the CaSPlan Monitoring Statement (CD06) and further analysis of housing development trends make it clear that the levels of growth were not attainable during the Plan period. Consequently a smaller allocation was identified at Harland road than in the Caithness Local Plan (CD17).

The Plan identifies CT01 as a Long Term Housing site. This was mainly due to the revised Housing Need and Demand Assessment (HNDA) (CD10) which showed less demand for new housing in Caithness than previously anticipated and alternative sites elsewhere in the village were considered more appropriate including the former steading at Castlehill which has live consent for a housing development. By identifying it as a Long Term site the Council is indicating the likely preferred direction for growth beyond the period covered by this Local Development Plan. The suitability of these sites for development has been subject of initial consideration through the preparation of this Plan. However, they are not being invited 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 we will consider bringing forward long term as allocations (subject to further assessment and identification of any developer requirements) or whether they still reflect the likely preferred direction for growth and should remain proposed as long term sites. As a Long Term site the boundary shown is only indicative. Should the site come forward as an allocation in a future review of the Plan then a more appropriate boundary may be drawn. The identification of specific Developer Requirements and suitable access points will also be made at this point.

Anyone wishing to suggest alternative housing sites (e.g. land east of Harland Road) should submit these to the Council at the beginning of the plan review period to be fully considered.

In respect to wider issues raised in regard to housing supply and demand please see Issue 3 Growing Communities under the Housing Land Supply section. This sets out a more detailed response on housing figures and the approach to allocating the housing land supply.

Economic concerns

In respect to the 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.

Prioritising brownfield sites

The first Placemaking Priority for Castletown promotes opportunities to develop brownfield and infill sites. This clearly displays the Council's support in principle for redeveloping brownfield sites and aims to reduce the pressure on greenfield land. It is recognised that it is not always appropriate to limit development opportunities to brownfield sites as these often pose additional constraints and the sites available may not be suitable for the type of development. Consequently there is a need to allocate suitable alternative greenfield sites

to ensure that valuable investment in the area is not discouraged.

Amenity concerns

Concerns raised about noise and general disruption are addressed as part of the planning application process. Planning conditions and informatives would be included to ensure that noise and other issues would be kept at acceptable levels during and after the construction stages.

Although the Council are sympathetic to health concerns of people who live next to potential development sites 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 and through the HwLDP (CD18) Policy 28 Sustainable Design.

Piecemeal development

One of the main aims of including Long Term sites is to provide a longer term vision for an area and therefore avoiding piecemeal development.

Environmental issues

The area shown as Expansion of the Green Network behind the houses at Harland Road provides separation between the existing houses and any new development. The area shown is indicative only and would be further defined if and when the site is included in future development plans as an allocation or a planning application is lodged.

Flood risk

The risk of flooding on parts of the site was identified as part of the Strategic Environmental Assessment (SEA) (CD07) site assessment. If the site is taken forward as an allocation at future plan reviews it is expected that a Flood Risk Assessment would be included as a developer requirement.

Impact on the wildlife

The areas of woodland are recognised as being important to the setting of Castletown for supporting a range of wildlife. As the last Placemaking Priority states the Council will seek to enhance access and protect these from development. HwLDP (CD18) Policy 74 Green Networks will ensure that any development proposals for CT01 will be expected to help promote greenspace linkages and safeguard/enhance wildlife corridors.

Neighbour notification

The Council notified everyone within 30 metres of an allocated site in the Plan, going beyond the minimum 20 metre Neighbour Notification requirement. In addition to this the Council has undertaken a wide range of publicity at each stage of the plan making process, including press releases, public adverts and leaflet mail-drop to every property in Caithness and Sutherland.

The Council are therefore not minded to remove the site from the Plan. However, if the Reporter considered the site to be unnecessary then the Council would not averse to the site being removed from the Plan and the settlement boundary amended to exclude the site.

The Council notes the comment from Scottish Water regarding early engagement. Should

the site be considered at future Plan reviews for allocation or prospective developers come forward the Council will look to promote early engagement with Scottish Water regarding specific infrastructure requirements.

CT02 – Castlehill Steading

It is acknowledged that the Proposed Path running southwards from the harbour through the arched building to Castlehill Estate may be an unreasonable requirement for a prospective developer since it is the only useable structure on property. If the Reporter is so minded the Council would be content for this section of the Proposed Path to be removed. The Proposed Path running east/west is an important pedestrian link and as it is only indicative the Council is not minded to make this modification.

Developer Requirements

The Developer Requirements for a Programme of Archaeological Works and a Tree Protection and Management Plan have been included to ensure that the heritage features and mature woodland are protected. Previous survey work may still be applicable and submitted at application stage to satisfy the Developer Requirement. Accordingly, the Council believes the Developer Requirements relating to archaeology and tree protection/management should be retained without modification.

The Council believes that SEPA's request is based on sound evidence. Therefore, if the Reporter is so minded, the Council is content for the following developer requirement being added: "Flood Risk Assessment (no development in areas shown at risk of flooding)". This will address any issues relating to surface water drainage and flood risk which are set out in the HwLDP (CD18) at Policy 64 Flood Risk and Policy 66 Surface Water Drainage and the associated Flood Risk and Drainage Impact Assessment Supplementary Guidance (CD13).

Castletown Masterplan (2007)

The Prince's Trust prepared the Castletown Masterplan in 2007 (CD26) to formalise a vision following engagement and consultation with the local community. Comments relating to inconsistencies and conflicts with the requirements set out in the HwLDP (CD18) are not accepted. Policy 26 in the HwLDP (CD18) states the masterplan will provide a framework for considering proposals in advance of the new area Local Development Plan. The masterplan is almost 10 years old and the Council is required to have a Development Plan which is up-to-date and enables the delivery of the right development in the right place. Many of the core principles identified in the masterplan have been carried forward and form the basis of CaSPlan but there have been major changes in the economy and the development sector since the masterplan was produced. As part of the preparation of the Plan the sites considered as most appropriate have been taken forward, based on a judgement on the effectiveness of the site, environmental and landscape impacts and potential regeneration and heritage value from redevelopment.

Castletown Masterplan as Supplementary Guidance

The Council does not intend to take the Castletown Masterplan (2007) (CD26) forward as Supplementary Guidance. The key principles of the masterplan have formed the basis for several of the Placemaking Priorities and the site allocations. The relatively low levels of development pressure in the area indicate that the approach taken in the Plan will provide a generous land supply for a range of uses over the course of the Plan period. It should be noted that the Castletown Masterplan will remain as a material consideration in determining

relevant planning applications.

Allocation to reflect planning permission (16/00927/FUL)

The southern boundary of CT02 was intended to be drawn around the first phase of the planning permission. Having re-examined this it is apparent that the first phase extends approximately 30m further south. If the Reporter is so minded the Council would be content with the boundary being redrawn to include this area.

Having re-examined the indicative housing capacity figure for CT02 it is noted that it does not properly reflect planning permission 16/00927/FUL. Therefore if the Reporter is so minded the Council would be content to increase the capacity by 6 houses to provide greater clarity. This figure does not form part of the overall housing figures as shown on page 6 of the Plan. Therefore should the extra housing units be added then the overall housing figures will need adjusted.

The south eastern boundary of CT02 was chosen to reflect phase 1 of planning permission 16/00927/FUL. The second phase of development was excluded due to the revised HNDA (CD10) which shows a Housing Supply Target figure of 530 houses across Caithness and the Plan already exceeds this figure. Concerns over allocating just the first phase of development are noted. It is recognised that the entire site was an allocated site within the existing Caithness Local Plan (2002) (CD17). The recent renewal of the original application also shows a level of commitment to the development of the site and indicates it may be more effective than others sites. The proposal has also been designed to a high standard and its delivery would help to regenerate an important historic site in Castletown and generate interest in further development of nearby sites. Scotia Homes Ltd have also identified an area of amenity land which is greater (approx. 1700sqm) than required for the first phase (619sqm) to satisfy future development of the area. Therefore if the Reporter is so minded, then the Council would be content with the allocation being extended to include the later phase of the planning consent. This would add another 35 units to the indicative housing capacity of the site. Should this occur then a Developer Requirement should be added to ensure that the connection between Castletown and Castlehill which falls within the site is appropriately delivered.

Having re-examined the road access shown on the Castletown map the site access identified in the planning application is approximately 20 metres to the north. If the Reporter is so minded, the Council would be content with the access point being amended to better reflect the planning permission.

The Tree Protection Plan and Tree Management Plan are listed as conditions of the planning permission and as a result the Council are not minded to remove this Developer Requirement.

Request to split CT02 based on landownership

The allocation boundaries shown in the Plan were identified at the Main Issues Report stage and based on layouts set out in the Castletown Masterplan (CD26). Since then, however, it has been noted that the former steading and north west section of the field at Shelley Hill (i.e. relating to planning permission 16/00927/FUL) is under different ownership of Castlehill which is in the advanced stages of being purchased by another party. Therefore if the Reporter is so minded the Council would be content with separating the site in two to help provide greater clarity about the potential future development of the area.

The Developer Requirements relating to tree protection, protected species walkover survey and programme of archaeological works should be carried over to both allocations.

In addition, as the Castlehill Heritage Centre is outwith the ownership of Scotia Homes Ltd and is now fully redeveloped the Council would be content should the Reporter be minded to remove the area from the allocation.

The area was identified as a Mixed Use allocation due to the mix of uses which would be acceptable on the site and the retail unit included within the planning permission. If Scotia Homes Ltd wish to amend their proposals the Mixed Use allocation provides a greater level of flexibility.

CT03 – Former Castlehill Gardens

The responsibility of ensuring an appropriate water supply connection lies with the developer and Scottish Water. However, previous discussions with Scottish Water suggest that depending on the type and scale of the development proposal a water connection may require significant additional infrastructure. To help raise awareness of this to any prospective developers the Council would be content with the following text being added to the Developer Requirements should the Reporter be so minded: “Early engagement with Scottish Water is recommended to determine potential requirement for pumped water supply.”

The Council believes that SEPA’s request is based on sound evidence. Therefore, if the Reporter is so minded, the Council is content for the following developer requirement being added: “Flood Risk Assessment (no development in areas shown at risk of flooding)”. This will address any issues relating to surface water drainage and flood risk which are set out in the HwLDP (CD18) at Policy 64 Flood Risk and Policy 66 Surface Water Drainage and the associated Flood Risk and Drainage Impact Assessment Supplementary Guidance (CD13). It will also ensure that the mitigation outlined in the Strategic Environmental Assessment (CD07) is delivered in the Plan.

CT05 – Former Free Church, Main Street

The map in the Plan shows the path aspiration identified in the Castletown Masterplan (CD26) to enhance linkages between the Main Street and the trails within the former quarry. Although the line shown is only intended to be an indicative route it is recognised that the topography to the north west of the site may be more appropriate. Therefore to provide greater clarity on what may be expected of a developer if the Reporter is so minded the Council would be content with the Proposed Path route being moved approximately 25-30 metres to the west and the following Developer Requirement being added: “If feasible, provide access through the site to allow for connections with the Core Path network within the former quarry”.

CT06 - Land at Shelley Hill

Although CT06 is only identified as a Long Term the site shown on the map is not centred on the proposed wide, tree-lined street from Mackay Street to Castlehill. If the Reporter is so minded the Council would be content with rotating the allocation westwards by approximately 40 metres to correct this.

Requested Mixed Use allocation and Long Term Housing site north east of Castletown

The Council notes that the agents for the landowner and Scotia Homes Ltd request additional areas of land at Shelley Hill be included as either allocations or Long Term sites. The allocations for Castletown in the Plan show the areas which were considered to be either the most effective (e.g. CT02) or offer significant regeneration opportunities (e.g. CT03 and CT04). The Long Term Mixed Use site CT06 and the second Placemaking Priority were included to indicate the Council's likely support for development beyond the Plan period and reflect the Masterplan's vision of a better connection between Castletown and Castlehill. As shown in Appendix B of the report to the Caithness and Sutherland Committee in May 2015 outlining the interim position, we recognise there is merit in providing an opportunity for development in the short term adjoining Castletown and extending northwards to Castlehill. Due to the revised Housing Need and Demand Assessment (CD10) which showed a reduction in the amount of land needed for housing the Plan did not take the area forward as an allocation. Instead it was shown as part of the larger CT06 Long Term Mixed Use site.

However, the Council recognise that the site would help to provide a greater number of options for development in Castletown and deliver key elements of the masterplan, such as the tree lined boulevard connection from Traill Street to Castlehill. In addition, with relation to the request for the allocation of land for a new residential care home, although there is not a proven need for such a facility in Castletown it may help to support the projected aging population. Therefore, if the Reporter is so minded the Council would be content with the inclusion of a Mixed Use allocation adjoining Castletown at Mackay Street. This could include both Housing, with a suggested indicative capacity of 30 houses, and Community uses to provide support for a residential care home. Should the Reporter be so minded then a Developer Requirement could also be added to ensure that the tree lined boulevard connection from Traill Street to Castlehill which falls within the site is appropriately delivered.

The points put forward in support of the suggestion of additional land being allocated for development adjoining Castletown at Harbour Road and the A836 are noted, including the ability to establish road access points and that the land would not experience the same water and waste water connection issues as sites around Castlehill. As a result should the Reporter be so minded then the Council would be content with areas of land extending from Castletown at Harbour Road and the A836 being identified as Long Term Mixed Use. It is suggested that if this occurs then indicative access points could be added to the east and west end of the site and approximately 25 metres of Expansion of the Green Network shown alongside the existing houses at Castletown.

Additional Long Term sites

The Council is not minded to agree with suggestions for additional areas of Long Term sites at Shelley Hill. At present the allocations exceed the housing supply target and the existing areas of Long Term sites show an indication of the Council's support for further development in the future. Should there be reason to allocate further land at future plan reviews then additional areas can then be considered.

Allocation of single plots

The request for single plot depth development along the proposed avenue connecting Castletown and Castlehill is not considered appropriate. This would result in housing

development taking a ribbon form which can have a significant impact on the landscape. Due to the limited demand for housing land additional or extensions to exiting housing allocations are also not required at this time.

Triangle of land north east of CT06

The small triangle of land to the north east of CT06 is identified as Expansion of the Green Network. Should the site CT06 be developed in the future then the remaining section of the field could be set aside for greenspace or amenity use.

Scottish Water

Scottish Water's comments flagging up early engagement of current or prospective developers are noted. Should the site be considered at future development plan reviews for allocation or prospective developers come forward the Council will promote early engagement with Scottish Water regarding specific infrastructure requirements.

Reporter's conclusions:

Reporter's recommendations: