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3. Relevant Council's Supporting Documents

CD01: Scottish Planning Policy, Jun 2014
CD07: CaSPlan Revised Environmental Report
CD09: Habitat Regulations Appraisal Record, Aug 2016
CD10: Housing Need and Demand Assessment, Nov 2015

CD13: Flood Risk and Drainage Impact Assessment Supplementary Guidance, Jan 2013
CD17: Caithness Local Plan, Sept 2002 (as continued in force, 2012)
CD18: Highland-wide Local Development Plan, Apr 2012
CD20: Community Planning Partnership's Single Outcome Agreement
CD21: Highland First - Council's Programme
CD23: Thurso Western Expansion Area Development Brief, Jun 2003
CD25: Wick and Thurso Charrette Report, May 2013
CD33: Tourism Development Framework for Scotland: role of the planning system in delivering the Visitor Economy
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CD36: A framework for destination development. Ambitious for Tourism Caithness and North Sutherland"
CD41: Branchliner Project Report, May 2016
CD42: Visitor Accommodation Survey and Review (Caithness)

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Provision of the development plan to which the issue relates:	Thurso settlement text, placemaking priorities and site allocations excluding Thurso West distributor/relief road, TS04, TS12 and TS14																																																	
Planning authority's summary of the representation(s):																																																		
<p>Thurso General <u>SNH (909933), Sheena Mclachlan (960835)</u> Paragraph 111 (paragraph 113 of the Proposed Plan): Clarification required: Refers to the</p>																																																		

Wick charrette and "Wick's future". Should this read "Thurso" rather than "Wick"?

Scrabster Harbour Trust (980302)

Objects to the lack of detail given in terms of the current port and future prospects of Scrabster Harbour. This is not consistent with the sections elsewhere on Wick Harbour and Gill Harbour where the draft plan state that growth these ports /harbours will be encouraged. There should be a similar statement for Scrabster Harbour.

Thurso Bay Trading Co (980395)

Supports the aims of paragraphs 108 to 111 and highlights that this will be achieved by focusing expansion on the western side of the town.

Aaron McNicol (MPP1032856)

Supporting comment received in relation to the strategy for Thurso

Peter Knight (976437)

Respondent has walked along the riverside from Thurso to Halkirk (Braal Castle) and would suggest that this route is promoted/pursued within the overall framework of the plan - show the link between Halkirk and Thurso to riverside and/or Geise Farm.

Anne Dunlop (978180)

More consistency should be show in the town centre. In relation to the recent application at the former mart site, the Plan should not discourage large retailers from locating there. There are too many food outlets on Princes Street as most have tacky displays and gaudy signage in a conservation area and attract antisocial behaviour.

Ian Walker (979716)

Objects to the fourth Place Making Priority as it is irrelevant. A footpath can be established as it is at present and the community woodland is not viable due to being too difficult to maintain because of the weather.

RSPB Scotland (956544)

In planning for development of Thurso and Scrabster Harbours, appropriate consideration must be given to the importance of the local marine area to foraging seabirds throughout the year in order to avoid adverse impacts on a wide range of species. Modification sought: RSPB Scotland seeks a modification in the form of the following addition to the list of 'Placemaking Priorities' for Thurso: "Development must not have an adverse impact on the North Caithness Cliffs Special Protection Area nor on populations of foraging seabirds."

Thurso Bay Trading Co (980395)

Requests the Highland Council, if not plead with them, to understand how difficult in these financial times it is to develop and deliver anything of significance. If developer requirements are too onerous, particularly during early phases, things will be very tough and the town would run the risk of development stagnation. Respondent hopes that his idea of taking almost half his land holding and putting it in public benefit will go a long way to satisfying most early planning gain and developer requirements. The benefit to the town of a large community woodland and 20 acre public park, if delivered, cannot be underestimated, now or in the future.

Scrabster Harbour Trust (980302)

Strongly support the comments made in sections 112 and 114, and the first bullet point of the Placemaking Priorities.

Leslie Rowe (981069)

Objects to the Plan not identifying a site new community hall. The existing town hall was converted into Caithness Horizons several years ago and a new hall is very much needed. Possible sites include the tennis courts on Orlig Street or Sinclair Street drill hall.

George Mitchell (983251)

Not enough consideration has been given to the routing of buses and HGVs through the town. This will become increasingly important as the harbour expands.

Caithness Chamber of Commerce (983321)

Welcomes the recognition of the potential for growth of employment in the area due to the energy industry and encourage any support that can be given in this area. Pleased to see that regeneration of the town centre and the Thurso Harbour area are key priorities, and hope that all support necessary is given to encourage the tourism potential of Thurso.

Kenneth Nicol (977530), Jacqueline Ridgley (930800)

Respondent questions the assumption made in paragraph 108 that the marine renewables sector presents significant growth opportunities. All the companies developing wave energy generation in the Pentland Firth has gone into administration and only one company remains active in the tidal industry which is progressing slower than first thought.

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.

Iain Black (MPP1032452)

Comments made in association with objections to the exclusion of TS12 and TS14, comments that: improving the harbour and water sport facilities is long overdue and would be appreciated by residents and tourists; relocating industry from the water front to an industrial park would be a wise investment with environmental benefits; and improving the green areas of Thurso is essential and more people should be encouraged to take advantage of the outdoor walks and enjoy the scenery of the area.

Direction of Strategic Expansion

Kenneth Nicol (977530), Jacqueline Ridgley (930800)

Para 112 promotes the western expansion of the town but the enterprise area is unlikely to ever be developed given the lack of progress with marine renewables sector. Together with the unlikely delivery of the relief road the direction of growth is not logical and would lead to traffic congestion. The town should grow to the east instead given that the WWTW is in east Thurso.

David Doohan (980228)

Objects to the strategy for Thurso being focused on the west. Believes further consideration should be given to the east.

Swanson (973397)

Objects to para 112 identifying the focus of future town expansion to Pennyland and High

Ormlie. The focus should be land which the respondent holds (TS01 and TS10) as it meets the expected demand and is less controversial than developing Pennyland.

Kenneth Nicol (MPP977530)

Respondent objects to paragraph 112 which refers to opportunities to deliver improved transport infrastructure in Thurso West (paragraph 112) as he states that the relief road is unlikely to be developed in the medium term due to Highland Council budget reductions. This was an additional comment to those which he made during the Proposed Plan consultation in objection to paragraph 112 (paragraph 114 in the Proposed Plan) and the principal direction for growth of Thurso to the west.

Allocation of Land for a Hotel

David Doohan (980228)

Para 108 states “Land uses which compete with town centre businesses and risk impacting on the vibrancy and vitality will be restricted by the new Town Centre First Policy.” However allocating land for hotels outwith the town centre will undermine this as the existing town centre hotels are only running at 50% capacity at present. The Development Plan should be used to protect town centres not just because a landowner promotes development elsewhere.

Station Hotel (980280)

Para 111. Whilst the aim of improving the tourism experience is an excellent one, adding another hotel to Thurso would be very detrimental to the delicate balance of business we currently have. Thurso is already better supplied with hotels than any other town in Caithness. The effect of this is a lower price per room than Wick, Halkirk and Castletown and the closing at the end of the season of some hotels because there is not sufficient business to sustain them through the autumn and winter months. There are several hotels within the area that are up for sale and some that have closed their doors completely. This is a strong indicator of how hard it is for the hotel trade within Caithness. To upgrade the hotel stock we have is perhaps a more sensible option. All the time we have a short season of May to September and banks are actively avoiding the hospitality trade this is a huge challenge for hoteliers. Hotels need to generate sufficient capital in the summer season to enable them to cover costs over the winter months and allow maintenance and upgrade to their businesses.

With the introduction of National Living Wage and pensions many hotels are taking additional costs that cannot be passed directly onto the customer in terms of a price increase.

The greatest help to improve the quality of hotels in Caithness is to find ways of extending the main season and giving visitors a reason to visit the area outside the months of May to September. The country music festival, surfing competitions, water kayaking etc are all attractions that have drawn people to the area. This allows the businesses - not just hotels, to generate sufficient capital to re-invest in their businesses and the town. The benefits are also seen in longer term employment and income to the area.

The building of a new hotel in Thurso, whether it is a high quality hotel or a budget hotel such as Travelodge the impact is going to be the same. There will be hotels in Thurso that will not survive the impact. The existing built heritage of the town should be respected and

supported not destroyed.

Jane Telfer (979224)

While the plan indicates a commitment to improve the town centre there is only one proposed development within the bounds of the designated town area. This would appear to be a missed opportunity. The majority of the plan seems more intent on new development for surrounding environment and scenery and no thought appears to have been given to the redevelopment of the town centre itself. This results in the plan being unlikely to meet any of its aspirations regarding improving the vibrancy and vitality of the town. Without direct action in the town centre it is unclear how the Council will achieve the goals set out in this Plan.

Given the disparate ownership and intent of the proposed development sites it is unclear under what auspices this plan can achieve a co-ordinated result in the terms of the aims of Highland Council and in attaining any benefit for the residents.

Federation of Small Businesses H & I Region (980130)

Objects to the inclusion of para 111. The respondent recognises that a level of competition is good but there is no demand for additional bed spaces in Thurso. Were another hotel to be built it would seriously damage the existing hotels which operate in the town centre. Hotel occupancy is already low and many hotels close during the winter months. Rather than helping to “open the area up for the enjoyment of both residents and visitors”, and “provide more tourist facilities which will ultimately help to retain visitors in the area for longer”, he believes that a new hotel will force at least one existing hotel to close for good, damage employment prospects in the town, and do nothing to retain visitors for longer.

Proposals to allocate land for hotel developments outwith the town centre do not accord with the Council’s policy or SPP’s guidance on Town Centres First.

Please note also that Visit Scotland can find no record of the Strategy referred to in paragraph 109.

St Clair Hotel (980003)

Whilst Visit Scotland identify the need for more quality hotels in Caithness, there are at present a significant number of hotels for sale, two of which are at the quality end of the market, the balance are at the 2 star, 3 star section of the market, the majority of these hotels have been for sale for some considerable period of time, in the present financial market none of these are selling, this would indicate that there is no great desire from operators to enter the Caithness market at present. Thurso has sufficient hotel beds to cover the market, the tourist season is short, at a peak for only six to eight weeks maximum, the overall season being from the beginning of May to the end of September, during which the number of days where beds can not be found in the town are not significant.

At present the market is seeing an uplift from commercial requirements related to reinforcement of the electricity distribution grid, this is not expected to last for more than a couple of years, and the demand has been met by the rental market as well as the hotels, the hotels are able to provide an increase in capacity in comparison to the availability 10 years ago as the “British Coach Tour” market has reduced considerably.

In the past few years two of Thurso's hotels have operated on a seasonal basis, this has allowed the remaining hotels to run with a reasonable level of demand, thus ensure that rates do not get too depressed and out of season operating costs can either be covered or losses minimised, although demand this year has meant that one of the hotels has stayed open for the winter, this has had an overall effect on the market, and occupancy levels have seen some reduction.

The rates obtainable in Thurso are lower to the comparable hotels in Wick, typically some 20%, and significantly lower than those available in Inverness, 25 to 30%. If the hotels in the town are unable to generate reasonable levels of operating profits they will not be able to allocate funds to improve the quality of accommodation, if an additional hotel is added to the town with a large number of beds, 55 plus chalets, the result will either be a race to the bottom in terms of rates with the associated lack of investment and upgrade, or the closure of one or more of the hotels in the town, either of these would result in damage to the built heritage of the town, and the loss of jobs. It is the Council's responsibility to ensure that there is not a significant over supply of accommodation in the town, to allow this would not achieve some of the key "Placemaking Priorities" of the Local Development Plan. Outside Inverness, Thurso is one of the Highland regions best provisioned towns in terms of hotel accommodation. At present Thurso has sufficient Hotel accommodation to meet the requirements for the period ending 2020, if there is an unforeseen increase in the demand for hotel accommodation the Plan should be reviewed and adjusted as required, any additional space should be accommodated within the existing hotels or sites within the existing town footprint.

Leslie Rowe (981069)

Objects to paragraph 109 stating that more quality hotels are needed as many have been on the market for a long period of time. Questions the judgement of the Visit Scotland tourism strategy referred to.

TS01 – East of Juniper Drive

Amelia Walker (931321), Kenneth Nicol (977530), Michael Bowden (980202), Ian Walker (979716)

Supports the Housing allocation.

Thurso Bay Trading Co (980395)

Objects to Housing allocation as there is no benefit to the town in the short to medium term in comparison to TS14 and TS04 which would deliver greater long term strategy of connectivity and mixed use development.

TS02 - Site at Mount Pleasant

Kenneth Nicol (977530), Thurso Bay Trading Co (980395)

Support for small housing development in this area

Ian Walker (979716), Amelia Walker (931321)

Objects to the extent shown as non-preferred within the MIR not being taken forward to the Plan as a Housing allocation. Development here would have less of a landscape impact than at Pennyland.

David Doohan (980228)

Questions why Councillor Willie Mackay's comments on the MIR in support of a larger housing development at Mount Pleasant have not been taken into account. The reason given was that it would have wider landscape impacts but that could be argued about the allocations at Pennyland.

TS03 - West of Upper Burnside

Scottish Water (953627)

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

Kenneth Nicol (977530)

This small area should be considered in the short to medium term and could provide around 40 houses. This would be preferable compared to large allocation of land at TS04 for housing.

Ian Walker (979716), Amelia Walker (931321)

Supports Housing (objects to Long Term Status – assumed) on TS03 as the respondent understands a developer is negotiating to build on the site soon in the near future.

David Doohan (980228), Thurso Bay Trading Co (980395)

Supports the area for Long Term Housing

John Gunn and Sons Ltd (984009)

The MIR shows the site was preferred for housing development with the proposed bypass road to the West. The Plan now shows both a bypass line going through the site linking the A836 to the A9 as well as the proposed bypass line to the west. Respondent attaches a site layout drawing which shows that they had been progressing development plans for the site based on the MIR. Respondent states that they are in the advanced stages of preparing the site for housing development and ready to conclude the purchase of the ground shown. Unfortunately with the Plan showing the new road through the site, it does not make their development viable and will have to deliberate as to whether they terminate the plans. Respondent requests that the Council reconsider and remove this link road to allow development to proceed.

TS04 Thurso West – See Issue 11

TS05 – Former Mart Site

London and Scottish Investments Ltd (979770)

The landowner/developer currently has a planning application lodged with the Highland which they state meets the expectation of CaSPlan.

Support that the site is allocated for hotel uses as this reflects current market interest, it would be a more suitable location than any alternative greenfield site and it is located close to Thurso train station.

Respondent is broadly supportive of the outcomes and proposals identified at the Thurso charrette but flags up that a large retail development has already been approved on the site and the design and layout principles have already been established.

Any masterplan approach for Thurso itself or large sites therein should reflect viable, deliverable uses for such sites that deliver sustainable economic growth in the area in the short to mid-term.

Jamie Henderson (980168), Ian Walker (979716), David Doohan (980228), Amelia Walker (931321), Karen McLean (979677), Kenneth Nicol (977530), Jacqueline Ridgley (930800), Janetta Christie (975843)

Supports the inclusion of TS05 for one or more of the following reasons:

- There is a demand for such uses
- It would expand what the town has to offer
- Allocating land on this brownfield site would mean that the Plan does not have to allocate land for a hotel on greenfield land, i.e. TS14
- The area would be perfect for relocation of the businesses that will need moved eventually from TS07
- The developer requirements ensure that new development will complement the surrounding area and provide a 'welcome' entrance into the town by rail.

Thurso Bay Trading Co (980395)

Car parking for the train station and school need to be included.

Co-operative Group (980279)

Objects to the retail allocation on TS05. The Developer Requirements state that development should be in accordance with the planning permission for a large format food store 08/00494/REMCA. This has now lapsed and the planning application which is now pending for a mixed use development is not compatible with the Plan.

The Proposed LDP should not be establishing requirements for a site based on a planning permission which no longer exists and instead it should offer greater clarity on the scale of retail floorspace which is supported on the former Mart site as part of a mixed use development.

As the former Mart site lies outwith the defined Thurso town centre boundary, issues relating to retail capacity, impact and the sequential approach to site selection are all relevant to any support for new retail floorspace at this location. However, we are not aware of the Proposed LDP being supported by any evidence base which considers the requirement for new retail floorspace in the plan area. As a minimum requirement Scottish Planning Policy (Para 64) establishes that local authorities, working with community planning partners, businesses and community groups, should prepare a town centre health check to inform emerging development plans and decisions on planning applications. We are not aware of Highland Council having fulfilled this important requirement of SPP. SPP also requires that development plans adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities. Again, there is no evidence base to suggest that this process has been followed in allocating the Former Mart

site for town centre uses. It is certainly not acceptable for the Council to be relying on lapsed proposals dating from 2007 as any retail deficiency that was identified then may not exist now and the scale and nature of the impacts are likely to be quite different.

Alastair Chisholm Christie (980596)

Objects to allocation for a large supermarket but supports land for housing and small businesses. Supports a new safer route to school, additional parking space for the rail station and a new telephone box.

TS06 - Former Mill Site at Millbank

Co-operative Group (980279)

Objects to TS06. The Proposed LDP is silent on the scale and nature of retail floorspace which would be acceptable on the Millbank site. As this site lies outwith Thurso town, issues relating to retail capacity, impact and the sequential approach to site selection are all relevant to any support for new retail floorspace at this location. We are not aware of the Proposed LDP being supported by any evidence base which considers the requirement for new retail floorspace in the plan area or Highland Council fulfilling the requirements of SPP (paragraph 64) in respect of development planning and retail development. Consider that the support for retail development on this site should be removed on the basis that there is no evidence base to support an unquantified scale of retail floorspace on this out of centre site.

Ian Walker (979716), Amelia Walker (931321)

Supportive of Housing use.

David Doohan (980228)

Respondent considers that the site may be suitable for a hotel as it has views out to sea.

Kenneth Nicol (977530)

This area not suitable for retail or business given the location and other buildings in the area.

Ian Walker (979716), Thurso Bay Trading Co (980395), Janetta Christie (975843)

Supports Mixed Use allocation. Development which complements the surroundings would be an asset to the town.

Janetta Christie (975843)

Some protection may be needed from the nearby river and old mill lade.

Alastair Chisholm Christie (980596)

Objects to the inclusion of the site in the Plan as it is an area identified at risk of flooding, development could have an adverse impact on the mill lade and eel trap and greenbelt areas are gradually disappearing.

TS07 - Land at Sir Archibald Road

Kenneth Nicol (977530)

Preference for housing development along the riverside.

Alan Simmonite (979043)

The road down past the football park could be incorporated with the current path at the end of Sir Archibald Road to form a coastal walk. This would provide access to the Thurso East surfing area and beyond. Discontinuing use of the area for industrial use would enhance the appearance of the river side area. It would be more appropriate to have industrial use outside the town at locations such as the Janetstown site.

David Doohan (980228), Amelia Walker (931321)

Objects to Mixed Use allocation and considers the site suitable for a hotel facility as it is a brownfield site.

Thurso Bay Trading Co (980395), Janetta Christie (975843)

Supportive of Mixed Use allocation as shops, café, housing etc would be a real attraction and boost to the town. The existing residents at the site need to be carefully considered as part of the development process.

Ann Smith (MPP1032828)

Supporting comment received in relation to site TS07 Land at Sir Archibald Road.

TS08 – Land at Bridgend

Janetta Christie (975843)

Supportive of the allocation but highlights the potential risk of flooding. A protective wall around Bridgend House could possibly be extended to cover the site.

Amelia Walker (931321)

Supports proposed uses.

Alan Simmonite (979043)

Supports relocation of industrial uses from the site to other most suitable locations. Highlights the need to protect and enhance the coastal path to Thurso East for walkers and surfers.

Kenneth Nicol (977530)

Objects to Mixed Use allocation. The focus here should be on housing. The Charrette identified the river as an important feature of Thurso. Business / retail development in this area will detract from the presence of the river. The area beside the river has already seen industrial development which gives a negative impact of the area.

Ian Walker (979716)

Objects to mix of uses not including potential for a hotel development as this would protect the greenfield land at Pennyland.

Thurso Bay Trading Co (980395)

Concerned about feasibility of development on the site given its location to the river and restricted access. Respondent suggests a car park would be more suitable and would allow for greater connectivity along the coast and river areas.

Alastair Chisholm Christie (980596)

Objects to the inclusion of the site in the Plan as it is an area identified at risk of flooding,

development could have an adverse impact on the mill lade and eel trap and greenbelt areas are gradually disappearing.

TS09 - North of Scrabster Community Hall

David Doohan (980228), Kenneth Nicol (977530), Ian Walker (979716), Amelia Walker (931321)

Supports the site for Housing.

SEPA (906306)

The Coghill Burn runs through 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 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.

TS10 North west of Dunbar Hospital

Swanson (973397)

As landowners of the site they object to it being long term rather than an allocation because:

- It is an existing land allocation
- It is next to a business/retail park
- There are good views which would lend itself to housing development
- It has potential for it to be developed in the relative short term and there is interest from developers
- The proposed bypass would split the farm and the land would become unmanageable
- Being a relatively small site it makes it more effective than the other larger sites which are unlikely to get developed.

Kenneth Nicol (977530)

Objects to long term status. It should be a Housing allocation with an indicative capacity of 15.

Ian Walker (979716), David Doohan (980228), Amelia Walker (931321)

Objects to the long term status of the site and questions the reasons for the site being reduced in size from the Caithness Local Plan as the respondent understands there is a developer wanting to build it out in the near future and it would benefit from panoramic views over Caithness.

Thurso Bay Trading Co (980395)

Objects to inclusion of TS10 as Long Term Mixed Use as it will be of no benefit to the town in the short to medium term.

Janetta Christie (975843)

It is essential to have bus-stops included in the plans for the site.

TS11 – Viewfirth Park

Michael Arkley (960859), Helen Livingstone (968685), Walter McLachlan (979426), Jacqueline Ridgley (930800), Anthony Ridgley (979975), Ian Walker (979716), Timothy Ridgley (979979), Jason Ridgley (980223), Liz Hale (967473), David Doohan (980228), Eric Livingstone (979698), Sheena McLachlan (960835), Kathleen Macdonald (980253), Gary Stronach (980340), Ewan Henderson (984004), Robert McLachlan (979429), Jennifer McLachlan (979430)

Objects to proposed sporting facilities at TS11 for one or more of the following reasons:

Amenity issues

- It's a residential neighbourhood, surrounded by housing. It will have a significant impact on the amenity of the neighbouring houses including a loss of privacy and overshadowing. Residents closest to the sports building will effectively be looking out at a wall and in particular during the winter months their properties will be in shadow the majority of the day.
- There will be a significant visual impact as the re-levelling of the field would require a fall of approx. 3m across the width, a large chain link fence is proposed, light pollution from flood lights, the building would not be in character with the surrounding area
- Noise pollution extending into the evening/night due to likely long opening hours.
- The central location of Viewfirth makes it unsuitable for such a facility.

Inadequacy of facilities

- The proposed facility is inadequate for its stated purpose. The site restricts it to only 4 lanes. There is no space for spectators. There is no storage spaces identified for all the activities and staff which are proposed. There would be no room for any further expansion of the facility in the future.
- It is one of the last multi-purpose spaces in Thurso which can be used for a variety of uses such as festivals, football, cricket, scouts.
- The town will lose access to an important green space as the new facility will be fully regulated with restricted access.
- The proposal does not meet the requirements of SportsScotland as set out in their response to the MIR as the site is a local Community recreational space, not exclusively used for sports, therefore the development is a change of use not ancillary to the principal use of the site. The development involves the entire area not a minor part and would affect its use as the adopted Shinty pitch. The proposed development of the Viewfirth Green would mean the playing field/sports pitch for the Caithness Shinty Club who have made use of the playing field for the past few years would not be safeguarded, which would be detrimental to that sport in Thurso.
- The Highland Council's commissioned a report 'Site Appraisal for the provision of a six lane running track' dated December 2013. (cited in the Hub Information hand out)

The report stated “With the combination of the perimeter fencing and the visual intrusion of flood lighting, it is anticipated that utilising the park (Viewfirth) for athletics will not be feasible.” In its summary it further stated “Not recommended due to restricted size and close proximity of housing” “The park boundaries on the south east and southwest are lined with mature deciduous trees. The root protection zone of these trees will require accurate plotting if this option is taken forward to minimise any risk of the roots disturbing the track construction or vice versa.” The summary identified the old golf range as being more suited.

Site options

- Support shown for investing in a sports facility but not in this location and one which does not meet the original expectations.
- Alternative sites have not been fully investigated. The original aim was to identify a site for a 6-lane running track. The Plan should secure a site which can accommodate this not a second rate facility. Any major sports development in the town should be backed up by a rigorous site options appraisal exercise before plumping for one site or the other.
- The 2002 Local Plan refers to Sports Scotland having carried out a feasibility study and identified two site options for a Regional Sports Centre the first the existing Dounreay facilities (note not the Viewfirth Highland Council land) and Millbank. Questions the reasons for Millbank now being discounted. There are other sites within the town which should be considered for a Regional Sports Centre or Sports Hub and the updated Local Plan should refer to this aspiration rather than ignore it as it now appears to do. CaSPlan should set out the different site options and establish which site offers the greatest community benefit. A significant sports facility may be best sited at the High School or UHI where it would be of greatest use. Scottish Government policy now encourages education facilities to serve as a community campus for just this reason
- As it is a regulated and largely indoor facility it should utilise a brownfield site rather than openspace.
- "Caithness Community Leisure and Sports Facilities – Facility Review and Enhancement Proposal" also proposed that a new sports hall should be constructed adjacent to the linked sports hall at Thurso High School.

Access

- There is insufficient parking provision identified and parking in the neighbouring streets is already at a premium.
- Transport issues. Restricted access to the site and the transport impacts could result in health and safety issues. The Thurso Active Travel identifies that there are a high number of pedestrian accidents around Ormlie Road, the High School and the town centre. With 16 clubs and 1700 members interested in using the facility it would result in significant increases in traffic.

Other issues

- The shinty team has stated that they do not have an alternative playing field and that if Viewfirth was developed they could fold if another site is not found.
- The north part of the site should be allocated for affordable housing.
- Thurso needs to consider what it wants from its education provision for the next 25 - 50 years which again is what the Local Plan should be about. I would contend the

town cannot support 3 ageing primary schools with falling school roles and for example the mart site would be deal for a new primary school campus which links in with the high school, UHI and a community sports facility.

Sheena McLachlan (960835), Walter McLachlan (979426), Robert McLachlan (979429), Jennifer McLachlan (979430)

Any built development should be restricted to the site of the previous Viewfirth Sports and Social Club and should be no higher than the previous building.

Ian Mackay (978586)

It is very much under utilised but it would be good to see it landscaped as a public park with pathways, trees, park bench etc.

Kenneth Nicol (977530)

Supports the allocation but would like to see it include a public park. Concerned about the lack of car parking and the impact on the transport network.

Thurso Bay Trading Co (980395)

Supportive of a new sports facility but concerned about the proposed location at TS11. Questions whether another sports facility is being planned at Halkirk. Millbank seems a much more sensible option for a sports hub as it would complement/utilise the swimming pool, rugby club and gym already there.

TS12 – East of Burnside see Issue 12

TS13 - Thurso Harbour

Kenneth Nicol (977530), Ian Walker (979716), David Doohan (980228), Willie Steven (980239), Amelia Walker (931321), Thurso Bay Trading Co (980395), Janetta Christie (975843)

Supports Community allocation for water sports facilities as this will help to promote surfing and watersports.

SEPA (906306)

Part of the site is within the Coastal Flood Map and we have a developer-prepared flood risk assessment which suggests that nearly all of the site may be at risk of flooding. We note that this allocation is for development of a harbour for community and recreational facilities. In line with the risk framework of Scottish Planning Policy, exceptions to flood risk avoidance may arise if the location is essential for operational reasons, such as navigation and water based recreation uses. We are content that this exception could be applied in this case. Implementation of the current developer requirement “Flood Risk Assessments may be required (no development in areas shown to be at risk of flooding)” is likely to result in development of the site not being possible. As a result we recommend the above developer requirement is deleted and replaced with “Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures.” Such an approach is in line with the mitigation proposed in the Environmental Report. This amendment will ensure that development of the site can be delivered and the development type complies with the flood risk framework outlined in paragraph 263 of Scottish Planning

Policy.

TS14 – Land West of Caravan Park see Issue 12

TS15 – Scrabster Harbour

SNH (909933)

The text should refer to the North Caithness Cliffs SPA, rather than a generic “Natura site”, and be amended in line with other text referring to such sites within the LDP, eg to read “Development proposals will require to demonstrate that there would be no adverse effect on the integrity of the North Caithness Cliffs SPA.” SNH also recommend that the potential for impacts of major, disturbing development activity at TS15 to take account of noise and vibration (eg from piling) impacts on migrating salmon from the River Thurso SAC. SNH therefore recommend the addition of text such as “Development proposals will require to demonstrate that there would be no adverse effect on the integrity of the River Thurso SAC, for example (but not limited to) through noise and vibration caused by major construction activities such as piling.”

SEPA (906306)

Part of the site is within the Coastal Flood Map and therefore is likely to be at risk of flooding. We note that this allocation is for development of a harbour for industrial use. In line with the risk framework of Scottish Planning Policy, exceptions to flood risk avoidance may arise if the location is essential for operational reasons such as navigation, transport and utilities infrastructure. We are content that this exception could be applied in this case. Implementation of the current developer requirement “Flood Risk Assessments may be required (no development in areas shown to be at risk of flooding)” is likely to result in development of the site not being possible. As a result we recommend the above developer requirement is deleted and replaced with “Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures.” Such an approach is in line with the mitigation proposed in the Environmental Report. This amendment will ensure that development of the site can be delivered and the development type complies with the flood risk framework outlined in paragraph 263 of Scottish Planning Policy.

Ian Walker (979716)

Supportive of Industrial allocation. However, this area is not shown on the most recent map of the Thurso/Scrabster area

Amelia Walker (931321), Thurso Bay Trading Co (980395)

Supports Industrial allocation.

TS16 - Land at Scrabster Mains Farm

Ian Walker (979716)

Supports Industrial allocation. However, this area is not shown on the most recent map of the Thurso/Scrabster area

Amelia Walker (931321), Thurso Bay Trading Co (980395)

Supports Industrial allocation.

TS17 - North West Of Thurso Business Park

Ian Walker (979716), David Doohan (980228), Thurso Bay Trading Co (980395)

Supports inclusion of Long Term Industrial site as it is the direction that the town should expand and it would facilitate the by pass delivery.

Michael Bowden (980202), Dorothy Anderson (980209)

Objects to inclusion of TS17.

Amelia Walker (931321)

Objects to Long Term Industrial status. This area should be prioritised for development for leisure and business sites.

Modifications sought by those submitting representations:**Thurso General**

SNH (909933), Mrs Sheena McLachlan (960835)

Change reference from Wick Charrette to Thurso Charrette

Scrabster Harbour Trust (980302)

Requests more detail on the current and future prospects of Scrabster Harbour.

Peter Knight (976437)

Requests the walk from Thurso to Halkirk along the riverside is promoted within the Plan.

Anne Dunlop (978180)

More consistency in planning decisions in relation to Thurso town centre.

David Doohan (980228), Kenneth Nicol (977530), Jacqueline Ridgley (930800)

Change the direction of growth, as shown in paragraph 110, from the west to the east of Thurso

Station Hotel (980280), Kenneth Nicol (977530), Jacqueline Ridgley (930800), St Clair Hotel (980003), Leslie Rowe (981069)

Remove of the reference, in paragraph 109, to the need to build more quality hotels in Caithness and the allocation of land for a quality hotel at Pennyland.

Swanson (973397)

Change the direction of growth, as shown in paragraph 110, from the west to the Thurso to TS01 and TS10.

Ian Walker (979716)

Removal of fourth Placemaking Priority relating to the expansion of the green network in Thurso West.

RSPB Scotland (956544)

Add the following addition to the list of 'Placemaking Priorities' for Thurso: "Development must not have an adverse impact on the North Caithness Cliffs Special Protection Area nor on populations of foraging seabirds."

Leslie Rowe (981069)

Requests that the Plan should identify land for a new community hall.

TS01 – East of Juniper Drive

Thurso Bay Trading Co (980395)

Removal of the allocation TS01 from the Plan

TS02 - Site at Mount Pleasant

Ian Walker (979716), Amelia Walker (931321)

The area should be enlarged to include the area shown as non-preferred within the MIR.

TS03 - West of Upper Burnside

Kenneth Nicol (977530), Ian Walker (979716), Amelia Walker (931321), John Gunn and Sons Ltd) (984009)

Change TS03 from a Long Term Housing site to a Housing allocation.

TS05 – Former Mart Site

Thurso Bay Trading Co (980395)

Car parking for the train station and car parking for the High School should be included as a Developer Requirement (Assumed).

Co-operative Group (980279)

Removal of Retail as part of the Mixed Use allocation.

Alastair Chisholm Christie (980596)

The Mixed Use allocation should only include Business and Housing uses.

TS06 - Former Mill Site at Millbank

Co-operative Group (980279)

Removal of Retail as part of the Mixed Use allocation.

Kenneth Nicol (977530)

Change from a Mixed Use allocation to a Housing only allocation.

David Doohan (980228)

Add Hotel to the Mixed Use allocation.

Alastair Chisholm Christie (980596)

Removal the allocation TS06 from the Plan.

TS07 - Land at Sir Archibald Road

David Doohan (980228), Mrs Amelia Walker (931321)

Add Hotel to the Mixed Use allocation.

Alan Simmonite (979043)

Inclusion of Proposed Path to Thurso East and additional Developer Requirement for improved path network (assumed).

TS08 – Land at Bridgend

Alan Simmonite (979043)

Inclusion of Proposed Path to Thurso East and additional Developer Requirement for improved path network (assumed).

Kenneth Nicol (977530)

Change from Mixed Use to Housing only allocation.

Ian Walker (979716)

Add Hotel to the Mixed Use allocation.

Alastair Chisholm Christie (980596)

Remove the allocation TS08

TS09 - North of Scrabster Community Hall

SEPA (906306)

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

TS10 North west of Dunbar Hospital

Swanson (973397), Kenneth Nicol (977530)

Change from Long Term Mixed Use site to a Mixed Use allocation.

Ian Walker (979716), David Doohan (980228), Amelia Walker (931321)

Change from Long Term Mixed Use site to a Mixed Use allocation. Extend the site to the area shown in the Caithness Local Plan.

Thurso Bay Trading Co (980395)

Remove the Long Term site TS10 from the Plan.

Janetta Christie (975843)

Add a requirement for new bus stops to be created as a Developer Requirement.

TS11 – Viewfirth Park

Michael Arkley (960859), Helen Livingstone (968685), Walter McLachlan (979426), Jacqueline Ridgley (930800), Anthony Ridgley (979975), Ian Walker (979716), Timothy Ridgley (979979), Jason Ridgley (980223), Liz Hale (967473), David Doohan (980228), Eric Livingstone (979698), Sheena McLachlan (960835), Kathleen Macdonald (980253), Gary Stronach (980340), Ewan Henderson (984004), Robert McLachlan (979429), Jennifer McLachlan (979430)

Remove the Community allocation TS07

Sheena McLachlan (960835), Walter McLachlan (979426), Robert McLachlan (979429), Jennifer McLachlan (979430)

Any built development should be restricted to the site of the previous Viewfirth Sports and Social Club and add Developer Requirement that development should be no higher than the previous building.

TS13 - Thurso Harbour

SEPA (906306)

Replace existing Developer Requirement for a Flood Risk Assessment with the following text: "Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures."

TS15 – Scrabster Harbour

SNH (909933)

Refer to the North Caithness Cliffs SPA, rather than a generic "Natura site", and be amended in line with other text referring to such sites within the LDP, eg to read "Development proposals will require to demonstrate that there would be no adverse effect on the integrity of the North Caithness Cliffs SPA."

Add the following Developer Requirement: "Development proposals will require to demonstrate that there would be no adverse effect on the integrity of the River Thurso SAC, for example (but not limited to) through noise and vibration caused by major construction activities such as piling."

SEPA (906306)

Replace existing Developer Requirement for a Flood Risk Assessment with the following text "Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures."

TS17 - North West Of Thurso Business Park

Amelia Walker (931321)

Change from a Long Term Industrial site to an Industrial allocation.

Summary of responses (including reasons) by planning authority:

Thurso General

Incorrect Reference to Thurso Charrette (paragraph 111)

It was recognised that in paragraph 111 (Thurso settlement supporting text) (paragraph 113 in the Proposed Plan) it mistakenly referred to Wick Charrette instead of Thurso Charrette. This mistake was noticed shortly after publication of the Proposed Plan and featured on the errata. The change was made at Modified Proposed Plan as a non-notifiable modification. No further comment was made on the matter during the Modified Proposed Plan consultation.

Reference to Scrabster Harbour Expansion Plans

The settlement text for Thurso highlights the role of Scrabster Harbour and the Enterprise Area in the future expansion of the town. The first of the Placemaking Priorities for Thurso states the support for the growth of employment uses related to the energy industry through the allocation of strategically important business and industrial sites. This implicitly refers to Scrabster Harbour given that the only two industrial allocations are Scrabster Harbour and Scrabster Mains Farm. Despite this, to be more explicit and consistent with the level of support given to other harbours in the Plan, if the Reporter agrees the Council would be content with amending the Placemaking Priorities to: "Support the expansion of Scrabster Harbour, development of the Enterprise Area and extension of the Business Park to attract energy related opportunities which will create new employment opportunities."

Footpath from Thurso and Halkirk

The second last Placemaking Priority identifies the opportunity for improvements to the wider green network and footpath connections southwards. As there are no community groups or other organisations formally seeking ways to deliver a formal route from Thurso to Halkirk along the river the existing statement is considered adequate.

Food outlets in the Town Centre

The Town Centre First policy within CaSPlan sets out the Council's aim of encouraging retailers and other businesses that generate significant footfall into the town centre. The quantity of food outlets in a given area is a licencing issue which is a matter for Trading Standards and the Licencing Committee.

Quality of development in the Conservation Area

The Council is required to implement appropriate controls over development, demolition and advertising to safeguard and enhance conservation areas. Most works to the outside of a building or structure in a conservation area require planning permission and listed building consent. Development including shop front and advertisements must comply with a number of standard conditions and regional and national guidance.

Protection for other bird species

The comments made by RSPB Scotland are noted. Other species of birds that are not qualifying interests of the SPA are undoubtedly important, however, they are not defining factors of whether development can/cannot occur. Therefore, the text in the Plan (together with any additional amendments suggested by SNH during the Proposed Plan consultation) is considered to be the most appropriate wording for complying with Natura Habitats Directive. Development proposals not connected to Natura sites should be adequately protected by EIA (e.g. for large developments) and/or the Highland-wide Local Development Plan (HwLDP) (CD18) policies on wildlife (e.g. for EIA and smaller developments).

Community hall allocation

The Plan does not specifically identify a site for a new community hall as there are no community groups or other organisations formally seeking ways to deliver such a facility. Although the sites suggested at Olrig Street and Sinclair Street were submitted too late in the plan making process to be considered they are located within the identified town centre boundary where there is a presumption in support of footfall generating uses such as a community hall. There are also several sites allocated for Community uses in Thurso which

would support a community hall proposal.

Comments in Support

Support from the landowner of Pennyland for paragraphs 108 and 111 is noted.

Support from Scrabster Harbour Trust for paragraphs 110 and 112 is noted.

The Caithness Chamber of Commerce's comments in support of promoting the energy and tourism sectors and support of the regeneration of the town centre and harbour area are noted.

The points raised by Ian Black are taken as being in line with and broadly supportive of the Plan, including a number of the Placemaking Priorities for Thurso. These broadly supportive comments are noted and welcomed.

Direction of Strategic Expansion

The main direction of growth for the town is well established, being allocated in the Caithness Local Plan in 2002 (CD17). Sufficient land is identified in the West for housing and employment uses together with suitable infrastructure improvements. Although the location of the waste water treatment works is an important consideration there are many other facilities situated on the west of the river. There is also capacity in the network to support the growth proposed within the Plan period. Upgrading of the network may be required if all the sites in the plan are built out.

At present there is no reasonable justification for changing the direction of growth and expanding to the east or south. If such reasons were presented then other sites may be preferable such as land at Oldfield as it could help to round off and provide a better entrance into the town.

Hotel Market – Supply and Demand

The following few sections address the comments received on the role of the tourism industry, the hotel market in Caithness and the implications of allocating land for a new hotel in Thurso. Comments on site specific hotel proposals are addressed in detail within the relevant site allocation section of this Schedule 4 Issue and Issue 11 Thurso West.

Tourism is key growth sector

Tourism is widely recognised as a sector which has significant growth potential in Caithness and could create a range of employment opportunities. It is identified as a priority sector within the Single Outcome Agreement (CD20) and the Council's Programme (CD21).

Highlands and Islands Enterprise (HIE) also include tourism as one of their core Growth Sectors with an aim of promoting a "strong range of high quality tourism products" (CD41).

The strategy set out in CaSPlan is reflective of this, promoting and supporting tourism growth within the Vision, the Employment outcome and sites allocated for Tourism and Leisure uses. The Spatial Strategy also defines the East Coast Connectivity and Tourism Corridor (from Thurso and John O Groats to the Dornoch Bridge) which highlights the area shown to have particular untapped tourism potential. The Council's capital programme outlines a range of projects which will help to enhance tourism and recreational facilities

and many of these are included within Proposed Action Programme.

Visit Scotland's development opportunities report

The '[Tourism Development Framework for Scotland: role of the planning system in delivering the Visitor Economy](#)' published by Visit Scotland in July 2013 (and refreshed in December 2016) (CD33) sets out the way forward to assist and promote growth in Scotland's visitor economy to 2020. It supports the national tourism strategy '[Tourism Scotland 2020](#)' (CD34) produced by the Tourism Leadership Group in 2012.

Visit Scotland's '[Aspirations and Ambitions... our development opportunities](#)' report (CD35) which was referred to in the Proposed Plan supports the delivery of these strategies by presenting opportunities for each planning authority to consider in future development plans. As part of the strategy of 'Improving the Customer Journey' the report identifies "opportunities for mid range hotels... in Caithness". The report also notes that "North Highland Initiative Tourism identifies opportunities to develop the food and drink offering in the Highlands - this requires a clear plan and agreed priorities." The allocation in the Proposed Plan of TS12 and TS14 at Pennyland for a high quality hotel, restaurant and spa was considered to help the delivery of these opportunities. However, the Reporter will note that the Modified Proposed Plan does not include these site allocations following the Committee decision in August 2016 to remove the sites from the Plan. The Council does not propose any further modification to the Plan.

Recent growth in demand for tourism accommodation

The tourism sector has experienced a major boost since the launch of the North Highland Initiative's North Coast 500 (NC500) coastal route. The NC500 along with other tourism initiatives could have the potential to genuinely transform the tourism industry in Highland by attracting more visitors and developing a range of inter-related opportunities. The NC500 has already been identified as one of the world's greatest road trips by travel writers/publications. Recent publicity suggests that some areas along the route, particularly in Caithness and Sutherland, have experienced significant increases in visitor numbers.

The business travel market has also been buoyant over recent years and has provided more year round activity. Several major construction projects in Caithness (including two new schools and the National Nuclear Archive Centre in Wick and various wind farm developments) have boosted visitor numbers over recent years. It is recognised that the continuation of the business tourism market is difficult to predict. However, with steady growth in the marine renewables sector and the decommissioning of Dounreay expected to last now until a date range of 2030 to 2033 the trade from business visitors is expected to continue for at least the short to medium term.

The rise in both the business travel market and the rise in leisure tourism has resulted in increasingly frequent periods where securing any accommodation is difficult. There is a danger that these supply and demand conditions will cause prices to increase and act as a deterrent to some leisure visitors. This would in turn impact on the economic development of the area.

It is noted that there are a high number of hotels across Highland which are currently being advertised for sale. To an extent this reflects market conditions and challenges of operating in a more rural part of the mainland. However, more recently several appear to have been purchased, including The Pentland Hotel in Thurso, Castle Arms Hotel in May, Ackergill

Tower near Wick and the Portland Arms Hotel in Lybster. This indicates that confidence in the Caithness hotel market may be growing.

Existing accommodation supply

The Highlands and Islands Enterprise (HIE) led programme “[A framework for destination development. Ambitious for Tourism Caithness and North Sutherland](#)” (2011) (CD36) review recognised a perceived deficit in terms of accommodation supply, as symptomatic of a wider level of inertia in terms of tourism development across the region: “... the area has failed to evolve its product/destination experience offering, in line with the changes currently taking place in the market and envisaged to take place over the medium/longer timeframe, i.e. 5 to 10 years. This is evident in the accommodation sector in particular, where there is a shortfall in certain types of product and quality of offering, e.g. self catering/ smaller scale resort facilities and those with supporting leisure facilities, etc.”

Accommodation as ‘attractors’

Despite claims that hotels do not attract visitors to an area the report mentioned above also identified that in most cases overnight accommodation is an ‘attractor’ in its own right. It states that visitor accommodation “pull[s] people into the area just as much as it is a ‘support[s]’ service to those who choose to enter the area to participate in a particular pastime/activity, etc.” Although the report highlights that accommodation as an attractor is more apparent in other more established tourism centres in the Highlands and other locations across rural Perthshire it indicates that overnight accommodation, particularly high quality hotels, attract people into an area.

Current review of visitor accommodation

Although the study on visitor accommodation in Caithness which is being commissioned by Highlands and Islands Enterprise (HIE) (CD42) has yet to be fully published (as of April 2017) an advanced draft has been considered as part of this response. It is noted that the issues raised within the study appear to correlate with many of the comments raised by objectors, including: concerns over the potential decline of demand from business travel; susceptibility in relation to cyclical trends; and seasonality of leisure visitors. However, the findings also back up the reasons for a higher quality hotel development with leisure facilities including: momentum generated from successful tourism initiatives; continuation of high levels of business travel customers; opportunities arising from growth in the energy/renewables industry; and dissatisfaction with the range of accommodation and facilities on available.

Concluding remarks

The Council believes that the tourism industry has a key part to play in the future of the Caithness economy and that improving the range of tourism facilities is necessary for the potential growth to be realised. As a result the Council are not minded to remove all hotel allocations from the Plan.

TS01 – East of Juniper Drive

Support for the site is noted. The sites at Pennyland and High Ormlie form the basis for strategic expansion of the town and will help to deliver improved transport infrastructure. However sites such as TS01 are important to provide a level of flexibility to developers. In addition, TS01 may present a more effective housing site in the short term than some parts of TS04 Thurso West which requires significant investment to open it up for development.

Therefore, the Council is not minded to remove the site allocation.

TS02 - Site at Mount Pleasant

Support for the site is noted.

Housing development at Mount Pleasant has been supported in the past and a degree of capacity still remains within TS02. However, the large site which featured as non-preferred in the MIR was not taken forward as it would represent a significant expansion of the town to the east. This would go against the agreed approach to continue to support the well established strategy to expand the town to the west. The rationale to expand westwards has been set out above. There is also sufficient housing land allocated in the west and in other locations in the town and at present there is no need to identify further housing land.

TS03 - West of Upper Burnside

Support for the Long Term Housing site is noted.

The site forms part of the long term expansion strategy of the town and would be important to the delivery of the distributor road linking Ormlie Road with the A9 at Scrabster. Due to the amount of housing land put forward for development the Council has had to prioritise land allocated for housing. The link between Provost Cormack Drive and the Business Park is the most important component of the distributor road. The section at TS03 would then represent the later phase. As a result TS03 has been identified as a Long Term site.

The potential relief road route was a topic of discussion during the charrette. A general consensus was reached that the preferred route should continue 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 (2002) (CD17) and Thurso Western Expansion Area Development Brief(CD23). As a result the new road line was shown within the Main Issues Report. Although comments received were generally supportive of the route given that no technical assessment has been prepared to identify the suitability of the proposed 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.

The Council notes the comment from Scottish Water regarding early engagement. However, the responsibility of ensuring an appropriate water supply connection lies with the landowner/developer and Scottish Water.

TS04 Thurso West – See Issue 11

TS05 – Former Mart Site

The reasons given in support for the inclusion of the Mixed Use allocation is noted, including: the potential demand for such uses; the potential to expand the range of facilities the town has to offer; and the regeneration of a prominent brownfield site.

Planning application status

In response to comments regarding the status of the previous planning permission, the principle of retail development was established on the site as part of the planning consent given to Tesco in 2008 (08/00494/REMCA). This consent is now 'locked on' as Tesco provided evidence that a 'meaningful start' has been made. As a result the Council are not minded to remove reference to the planning permission 08/00494/REMCA.

The new landowners of the site lodged a planning application (15/04656/FUL) for the erection of 2 retail units including a garden centre and new car parking area for Thurso rail station. Due to unresolved concerns raised by the Council as of April 2017 the application is still pending determination.

Masterplanning and development proposals

Policy 2: Delivering Development of CaSPlan states that "larger sites must be appropriately masterplanned. Each phase of development will need to show its relationship to this overall masterplan and demonstrate how the required infrastructure will be delivered". Given the size of TS05 and that the whole site is in the single ownership of the applicant a masterplan should be prepared to address issues such as future development opportunities, siting and design principles, active travel and transport infrastructure etc. This will also help present an overall vision for the site. To clarify this requirement if the Reporter was so minded the Council would be content with the following Developer Requirement being added: "Developer-led masterplan to accompany any planning application".

The aspirations for the redevelopment of the Former Mart Site were discussed at the Thurso Charrette. As shown on page 74 of the Charrette Report (CD25), it was established that a Mixed Use site would be the most suitable. It was also considered that an office type development should be located on the north western side, which adjoins the train station, as this would "lend some presence to the site when viewed from the town centre up Princes Street". The illustration on page 75 also provides an example of the type of building design which was envisaged, making a sympathetic and valuable contribution to the street. To address comments relating to streetscape design and ensure that the principles above are incorporated within any proposals for the site, if the Reporter is so minded the Council would be content with the following Developer Requirement being added: "Sympathetic streetscape siting and design and street frontage on the northern part of the site to reflect its immediate surroundings, proximity to heritage features and prominent location".

Transport concerns

In response to comments about improvements to the site and the High School, it is recognised that the current road layout along Ormlie road leads to potential conflicts between different modes of transport. Development of TS05 has the potential to exacerbate the situation, particularly for access and parking arrangements associated with the High School. As a result, if the Reporter is so minded then the Council would be content with the following Developer Requirements being added: "Transport Assessment"; and "Improvements to the current access and parking arrangements associated with the High School and Ormlie Road".

Tourism and Leisure allocations on Former Mart Site

The planning application (15/04656/FUL) on the northern section of the site for large retail units is currently pending. However, some aspects of this application are not considered to represent the expected site layout, siting and design. They show little consideration of the

local context and of the aspirations set out in the Charrette.

The subsequent response from the landowner to the Proposed CaSPlan consultation requests that the site should also be allocated for a hotel development. The range of uses identified for TS05 Former Mart Site includes Business, Tourism and Leisure; these would support the principle of a hotel development. Given the landowner wishes to develop retail on the northern part of the site any future hotel development would then be located to the south. However, we would consider that the best location for a hotel would be on the northern part of the site. This would be closer to the town centre and adjacent to the railway station and would lend its self more to a street frontage which integrated well with the surrounding area. It is also believed that the southern part of the site could be less attractive for a hotel development due to its neighbouring uses and would appeal more to a budget/branded level hotel.

The Council is also minded to consider the response by the Scottish Government (January 2016) to the Main Issues Report for the Highland-wide Local Development Plan review (CD15). The Scottish Government highlight Scottish Planning Policy (SPP) (CD01) paragraph 71 which indicates that development proposals, including retail, leisure, business and public buildings, which are outwith town centres should be thoroughly assessed and demonstrate that the impact on the existing town centre is acceptable. Taking this into account and the site layout issues described in the above paragraph, and if the Reporter is so minded, the Council would be content with the an additional Developer Requirement being added for a Town Centre Impact Assessment to be carried out to assess the economic impacts of a new hotel on the town centre hotel market.

Retail allocation

In response to the objection on behalf of the Co-Op to the retail allocation, the site has been allocated for retail as it currently has a live, locked on planning permission for a supermarket. However, the large retailer has since withdrawn interest and the site has been sold the supermarket proposal is not likely to now go ahead. As a result to help clarify this position if the Reporter is so minded the Council would be content with amending the Developer Requirements to: "Planning permission 08/00494/REMCA remains live. Any future applications on TS05 must address: active travel route to be established..."

The response to comments on the Council's approach to Town Centre Health Checks is outlined in Issue 3 Growing Settlements.

A retail impact assessment was carried out as part of the original application process and it was considered not to have an undue adverse impact on the town centre. As the market will have changed since then and the type and scale of any retail development on the site is likely to be different. To highlight that retail proposals of a certain type or size would require a retail impact assessment to be carried out if the Reporter is so minded the Council would be content with the following Developer Requirement being added: "Retail impact assessment may be required".

See Issue 3 Growing Communities for the response to issues relating to the allocation of land for retail uses outwith town centres.

Replacement of telephone box

Maintenance/replacement of telephone boxes is not a planning issue but the responsibility

of BT. No modification is proposed to the Plan.

TS06 - Former Mill Site at Millbank

Support for the Mixed Use allocation is noted.

The site covers the C-Listed foundry which is a collection of traditional 19th Century industrial buildings made using local Caithness materials. The foundry has local heritage value and benefits from an attractive setting next to the river. Therefore the site has been allocated for a mix of uses to encourage its redevelopment/regeneration. The redevelopment of the adjoining former mill building into the Old Mill Theatre has been a great success and provides a valuable asset to the town. Given the heritage value and attractive setting of TS06 small retail/craft units and/or a small hotel would help to improve the appearance of the area and contribute to the tourism offer. As the building is C-Listed and the neighbouring building is B-Listed it is expected that the scale of development will be modest and not detract from existing businesses in the town centre.

Although the scale of development is not considered to be a threat to the town centre, Policy 1 Town Centre First states that “If the Council considers that a proposal may result in an adverse impact on the vitality and viability of any defined town centre, the developer will be required to produce a retail impact assessment, tailored to reflect the scale and function of the town centre in question. The Council will only support proposals accompanied by competent assessments that demonstrate no significant adverse impacts.”

See Issue 3 Growing Communities for the response to issues relating to the allocation of land for retail uses outwith town centres.

In respect to comments on the allocation of retail sites outwith town centre boundaries please see Issue 4 Employment. This provides a more broad response on the implementation of the Town Centre First Policy.

The risk of flooding was identified as part of the Strategic Environmental Assessment (SEA) (CD07) and a flood risk assessment has been included as a Developer Requirement. This will ensure that appropriate mitigation is identified to inform any development proposals.

TS07 - Land at Sir Archibald Road

Support for the Mixed Use allocation is noted.

The aspiration to redevelop and enhance the appearance of the east bank of the river was first identified within the Caithness Local Plan (CD17). It was an issue which was also discussed in detail at the Thurso Charrette where the replacement of employment uses with residential and mixed use regeneration could greatly enhance the river corridor. The Charrette Report noted that “This would create more natural landscapes and habitats whilst providing amenity for local people and visitors with focused areas for leisure, recreation and culture.” This is reflected by the Mixed Use allocation in the Plan.

The limitations of encouraging existing industrial businesses to relocate are acknowledged. However given the desire within the community of redeveloping the area and its prominent location this should remain as part of the Plan.

The suggestion that the site could help connect footpath provision along the coast is noted. The enhancement of active travel connections through the site is already identified as a Developer Requirement. However, if the Reporter is minded a Proposed Path could be added to the Thurso map as this may provide greater clarity to prospective developers and the community.

Concerns over protection for existing residents at the site are noted. The allocation includes several residential properties which are not envisaged as being redeveloped. Therefore to help protect these houses and give residents assurance the Council would be content were the Reporter minded to remove these from the allocation.

It may be noted that the respondents who object to the range of uses allocated not including hotel appear to be suggesting it as an alternative to development of TS14. However, these sites are arguably less attractive for a quality hotel given the adjoining uses and limited views. As this site was also not suggested by the landowner or potential developer then the Council are not minded to modify the Plan to include hotel as one of the mix of uses.

TS08 – Land at Bridgend

Support for the Mixed Use allocation is noted.

The aspiration to redevelop and enhance the appearance of the east bank of the river was first identified within the Caithness Local Plan (2002) (CD17). It was an issue which was also discussed in detail at the Thurso Charrette where the replacement of employment uses with residential and mixed use regeneration could greatly enhance the river corridor. The Charrette Report (CD25) noted that “This would create more natural landscapes and habitats whilst providing amenity for local people and visitors with focused areas for leisure, recreation and culture.” This is reflected by the Mixed Use allocation in the Plan.

The site is considered to be effective and presents a suitable development opportunity. Much of the site has been cleared and the estate agent’s website appears to show that it has recently been purchased. The site is not considered suitable for a public car park given potential access constraints and the Council is unlikely to be in a position to deliver such a facility, particularly given the ongoing budgetary constraints the Council is facing.

The suggestion that the site could help connect footpath provision along the coast is noted. The enhancement of active travel connections through the site is already identified as a Developer Requirements. However, if the Reporter is minded a Proposed Path could be added to the Thurso map as this may provide greater clarify to prospective developers and the community.

The risk of flooding was identified as part of the SEA (CD07) and a flood risk assessment has been included as a Developer Requirement. This will ensure that appropriate mitigation is identified to inform any development proposals.

It may be noted that the respondents who object to the range of uses allocated not including hotel appear to be suggesting it as an alternative to development of TS14. However, these sites are arguably less attractive for a quality hotel given the adjoining uses

and limited views. As this site was also not suggested by the landowner or potential developer then the Council are not minded to modify the Plan to include hotel as one of the mix of uses.

TS09 - North of Scrabster Community Hall

Support for the Housing component of the Mixed Use allocation is noted.

Shortly before the publication of the Proposed Plan the owner of the northern part of TS09 was in contact with the Council to inform that they had no intention of developing the site for the proposed uses. It appears that the land was put forward at Call for Sites stage as part of a larger suggestion by the neighbouring landowner who would require access through TS09 to develop their site. The owner of TS09 has gained planning consent for a large domestic shed on the area north of St Clair Avenue. Although the owner did not submit a representation during the consultation if the Reporter agrees the Council would support the removal of site from the Plan.

The Council believes that SEPA's request is based on sound evidence. Therefore, should the Reporter not opt to remove the site and 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).

TS10 North west of Dunbar Hospital

Long Term site

The site at Dunbar Hospital was identified in the existing Caithness Local Plan (CD17) for longer term expansion of the settlement. It states that the site along with land at Pennyland should only come forward when all other allocations have been developed. As part of the Thurso Western Expansion Area Development Brief (2003) (CD23) the site was also identified as the last phase of development. Although several of the allocations identified the Caithness Local Plan have since been built out the land at Pennyland remains undeveloped and continues to be the strategic expansion area for Thurso.

The points raised by the landowner in support of the site are noted and the Council agrees that the site presents a reasonable housing option. However, with sufficient existing capacity at Pennyland and other brownfield sites the land at Dunbar Hospital is not required within the timescales of CaSPlan. Consequently the Council are not minded to allocate the land for Housing but for it to remain as a Long Term Housing site.

Site boundary

The western side of the site shown in the Caithness Local Plan (CD17) does not follow field boundaries or obvious topographic features. It appears to be indicative due to the longer term nature of the site. The area shown within CaSPlan uses the same southern boundary line as Dunbar Hospital and it extends up to the former driving range. As a Long Term site it shows only the likely direction of growth beyond the Plan period. Therefore the exact allocation boundary will be confirmed if the site is considered suitable at future plan reviews.

Additional bus stops

The need for additional bus stops will be determined if the site is taken forward as an allocation in a future plan review or at planning application stage.

TS11 – Viewfirth Park

There has been a long held desire by many in the local community for the development of a dedicated high quality sports facility. Within the existing Caithness Local Plan (CD17) the need for a sports facility in the town was highlighted and potential site options for it were identified, including Viewfirth Park.

Over recent years Thurso Community Sports Hub (TCSH) has been working on delivering a running track and indoor sports facility in Thurso. TCSH has been promoting Viewfirth Park as the most suitable site, citing its central location, proximity to schools, the site being relatively flat, and it's financially available given its land ownership. No other sites were suggested to the Council by any of the key stakeholders as potential alternative locations for the facility.

The site was re-assessed as part of the preparation of CaSPlan and it featured as a potential Community allocation within the Additional Sites and Ideas Consultation for CaSPlan (March to April 2015). The response from the public and many of the local sports clubs was overwhelmingly positive.

The Plan allocates Viewfirth Park for Community uses as it is an established sports and recreational site and to show the continued support for such uses. Transport issues and potential impacts on the amenity of local residents are recognised as being potential constraints to large scale development of Viewfirth Park. To ensure that transport issues are fully considered a Developer Requirement has been included for a Transport Assessment to be carried out with a particular focus on the local transport network, access and parking arrangements. Although 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 including the height of any buildings. Any planning application will also be considered against relevant HwLDP (CD18) policies, such as Policy 28 - Sustainable Design, Policy 29 - Design Quality and Place-Making, Policy 51 - Trees and Development, Policy 75 - Open Space and Policy 76 - Playing Fields and Sports Pitches.

Should the sports hub proposal be progressed further then at planning application stage it would need to demonstrate that the site can adequately accommodate the development and there would be no undue adverse impacts on the local community.

At this stage the Council may also seek to consult Sportscotland on the suitability of the proposed facilities (e.g. the number of running lanes and adequate space for spectators). It is also assumed that given the proposal will require funding from sources such as Sportscotland that the adequacy of the facilities will be thoroughly assessed to secure funding for the project to proceed.

For these reasons the Council are not minded to remove the Community allocation at Viewfirth Park.

TS12 – East of Burnside see Issue 12

TS13 - Thurso Harbour

Support for the allocation and a water sports facility is noted.

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 deleted and replaced with "Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures."

TS14 – Land West of Caravan Park see Issue 12

TS15 – Scrabster Harbour

Support for the Industrial allocation is noted.

SNH has suggested revising the mitigation in the Appropriate Assessment to read: "Development proposals will be required to demonstrate that there would be no adverse effect on the integrity of the North Caithness Cliffs SPA". SNH also request the following Developer Requirement is added: "Development proposals will require to demonstrate that there would be no adverse effect on the integrity of the River Thurso SAC, for example (but not limited to) through noise and vibration caused by major construction activities such as piling." As the Habitat Regulations Assessment (HRA) (CD09) requires to be signed off by SNH for the plan to be adopted, the Council is content for this developer development to be added to this site.

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 deleted and replaced with "Flood Risk Assessment required to inform layout and design. Only low vulnerability uses or operationally essential uses in areas shown to be at risk of flooding, to be accompanied by resilience measures."

TS16 - Land at Scrabster Mains Farm

Support for the Industrial allocation is noted.

TS17 - North West Of Thurso Business Park

The area was identified at the Thurso Charrette for employment purposes, more specifically as a long term expansion of the Enterprise Area site TS16. It is recognised that inclusion of additional land south of TS16 likely exceeds the requirements for business and industrial land during the Plan period. Nevertheless the inclusion of the site indicates the longer term vision for the area and the support for the growth of employment uses. Business and Leisure uses are not considered suitable for this site due to the neighbouring industrial allocation at TS16 and suitable Business and Leisure land being allocated elsewhere in

Thurso.

Reporter's conclusions:

Reporter's recommendations: