

<b>Issue 82</b>	<b>Caithness and Sutherland Vision</b>		
<b>Development plan reference:</b>	Chapter 5 - Caithness and Sutherland Vision (Pages 11 - 13)		<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number)</b>			
<p>The Mountaineering Council of Scotland (MCS) (2), Brenda Herrick (5), Mr Alan Findlay (20), Dounreay Site Restoration Limited (DSRL) (26), Dornoch Rail Link Action Group (42, 536), Janetta Christie (81), Laid Grazings Committee (83), Scottish Natural Heritage (SNH) (118), Terence O'Rourke Ltd (Renewable energy client-base) (164), Highlands and Islands Green Party (HIGP) (168, 533), Highlands and Islands Enterprise (HIE) (190), Railfuture Scotland (227), Jones Lang LaSalle for Scottish and Southern Energy Plc and its Group Companies (SSE) (268), Scottish Renewables (270), Caithness Chamber of Commerce (274), Scottish Salmon Producers' Organisation (404), Julian Roberts (406), C and L Macleod (410), Wick Harbour Authority (417), Mr William Brown (423), Transform Scotland (425), Brian Balmain (435), John McMaster (440), Scottish Association for Public Transport (446), Graham Lund (448), CASA Planning and Environment Ltd for Cube Engineering (449), M Gilvray (453), C Niven (455), Rob Gibson MSP (474), K Ross (498), Mark Sullivan (512), Islay Macleod (Thrumster Estate Fieldsports) (521), EMAC Planning for Scotia Homes (532), Lyndall Leet (537)</p>			
<b>Provision of the development plan to which the issue relates:</b>	Vision for Caithness and Sutherland area		
<b>Council's summary of the representation(s):</b>			
<p><b><u>Economy and Regeneration</u></b></p> <p>Generally content that the Plan is offering a flexible approach to the development of the area to assist the transition of the economy from one recognised as being over-dependant on the nuclear economy to a much more diversified base. (190)</p> <p>It is pleasing to read that there will be an up-dated Dounreay Planning Framework. This will be welcomed by, especially, very many local residents. Hopefully, Dounreay will continue, in some way, to be an important source of local employment in the years ahead. (81)</p> <p><b><u>General Points on Vision and Spatial Strategy</u></b></p> <p>Support (assumed) for the following text: "The main east coast settlements complement each other, and there will be strong economic ties between the two counties and with the Inner Moray Firth area enabled by planned improvements to telecommunications network and broadband coverage." (190)</p> <p>Vision based on specialist engineering supported by improved transport links throughout the area may not be realistic. The plan would be strengthened by better defined priorities. In general the building of houses in remote areas</p>			

where there is inadequate infrastructure/ limited employment opportunities should be discouraged. Alternative vision suggested. (453)

Support for the sections of the plan that state –

- The region will be a connected and accessible place – A9 improvement schemes, including Berriedale Braes, will be delivered, as well as there being a significant increase in rail freight consolidating Lairg and Georgemas as distribution ‘hubs’ along with strategically located sidings with loading facilities.
- The revitalisation and development of John O’Groats and the region having a high quality tourist industry.
- The region being a centre of excellence for energy and engineering.
- The region becoming an international centre of excellence for marine renewables.
- The increased focus in the Plan of future key opportunities being developed by a range of organisations working with the Caithness & North Sutherland Regeneration Partnership. (274)

Need to encourage small businesses – the poor quality of broadband is problematic in small communities like Lairg where normal broadband through BT landlines is still not available. Any business, particularly small businesses now expect the best broadband connection which is not there at the moment. (83)

Pleased to read that the Tourist industry in Caithness and Sutherland is considered to be important. High quality facilities are necessary to attract people: consider the poor state of John O’Groats and the reputation it is receiving in the Press. (81)

Feel that ‘have a high quality tourist industry’ should be the number one priority on the list. Its position in the list in the Plan suggests that it is an after-thought. Tourism is already a big employer and has the potential to expand enormously as more and more people look for the sort of beauty, peace and space we have (83).

Statement that “other enterprises will have been attracted by a more flexible planning regime throughout Caithness” should be subject to Habitats Regulations Appraisal. (118)

Section 5.2.1 should be extended further than the current focus on settlements, specifically in order to highlight the exceptional potential of the Highlands as a renewable energy location to address the sustainable development and the sustainable economic growth of rural areas. The Council should address how this is to be realised through the development plan and recognition of the ‘do nothing approach’ should be included with regards to national and international targets. Limiting support for rural development to those identifiable as established communities excludes sustainable land development for renewable energy and thus is contrary to Scottish Planning Policy (SPP). (449)

Wish a few place names to be added to the Caithness and Sutherland figure 1 map as it is quite hard to identify where some of these items are. (5)

The Action Plan for Caithness (see Main Issues Report) is supported. The identified development opportunities should include the expansion of settlements, including Castletown, as part of a comprehensive proposal for the sustained growth of the area. The identification of Thurso as a subregional centre is supported but Castletown should be identified as a Local Centre. (532)

It is disappointing to note that, despite the Highland Vision, aquaculture is not mentioned in either of the strategies covering Sutherland or the West Highlands and the Islands. Aquaculture plays, and will increasingly play, a significant role in economic diversification, and will contribute towards achieving sustainable communities in these areas especially. (Paras. 5.2.1 and 6.2.1) (404)

Provision for cycleways is non-existent and must be included. (168, 533)

### **Marine Renewables and Associated Onshore Development**

Clarification sought on figure 1: Dounreay is shown as an industrial site of national importance and an offshore renewables base is shown near to Dounreay. Wonders whether this is just meant as a general location for marine renewables in the Pentland Firth or that Dounreay specifically might be a renewables base. Retaining Dounreay as a potential site for the future renewables industry will need to take account of the chosen Dounreay Site End State. (26)

HIE see the wave and tidal sectors within Pentland Firth and Orkney Waters as being one of the major drivers for the Highlands over the life of this plan and there should be explicit mention of these developments in the HwLDP and its associated Action Programme. As well as port infrastructure to support this sector there will be requirements for industrial land as well as infrastructure e.g. enhancement of the National Grid. (190)

The vision for Caithness and Sutherland recognises that the Pentland Firth will be the location for marine renewables, related facilities and industries, including the development of centres of excellence in marine engineering and environmental management. There is little by way of a specific policy framework to support this industry. An enabling policy framework should be included within the Plan to support this industry specifically. (268)

Clarification sought over whether the green dotted line off the north coast on the map at figure 1 is a potential route for a subsea cable rather than potential offshore renewable energy. Either way, Habitats Regulations Appraisal for that and also for the Pentland Firth as the location for marine renewables is required, including possible landfall and connection locations. (118)

The map, figure 1, shows a line right along the north coast of 'Potential Offshore Energy' – Laid Grazings Committee have no problem with this as long as it is over the horizon and out of sight or under the sea. Anything visible or on land must be approached with the very greatest sensitivity and the Grazings Committee would not support this. (83)

### **Onshore Renewables**

Focus on renewables success appears to be solely on marine renewables. Figure 1 has no reference to onshore renewable schemes either as specific projects or illustrative zones - this is very disappointing especially when there is clear indication of provision for grid reinforcement. Also this is unfortunate given the important role they have to play in bringing benefits to communities in this area. The area also has a key role to play in helping Scotland to realise its targets through onshore renewables. This should be reflected in the plan, to transcribe national policy to the Local Development Plan (LDP). (164, 270, 449)

Caithness will not be a place of outstanding natural assets such as its distinctive big skies and open rolling landscape if it has any more alien wind farms. Above all they should not be built on Caithness and Sutherland Peatlands which are a natural system of carbon dioxide (CO<sub>2</sub>) absorption. The environment should be safeguarded. Marine turbines are much the preferred option. (537)

### **Dornoch Rail Link / Far North Line**

Campaigners for and supporters of the Far North Line (FNL), being the rail-line north of Inverness to Caithness, and suggested Dornoch Rail Link (DRL) (also known as the Tain-Golspie Rail Link) object to the lack of reference in the Plan to specific line improvements and to aspiration to achieve the DRL specifically. The grounds for objection stated include the following:

- Improvements to the rail line, including DRL, would support economic and social regeneration in the context of the run-down of Dounreay, including growth of the marine renewables industry, Scapa Flow developments in Orkney and development of the University of the Highlands and Islands (UHI) through improved connectivity. There is recognition of potential benefits amongst business leaders and from the United Kingdom Atomic Energy Authority (UKAEA).
- Improvements to the rail line would bring benefits in terms of sustainable transport, helping to address climate change concerns and encouraging modal shift from road to rail for both passengers and freight.
- The DRL could deliver a journey-time reduction of 45 minutes and achieving journey time reductions on the line should be part of the Plan's vision. The significance of such savings has previously been recognised in the Highland Structure Plan and Caithness Local Plan.
- Achieving increased passenger numbers on the line is part of the Plan's

vision for making Caithness and Sutherland a connected and accessible place and the spatial strategy indicates an improved rail connection to the north, but it is not clear how these will be achieved especially north of Lairg in the absence of the DRL being included in the Plan and as such the Plan is flawed.

- Some reference to the DRL can still be made in the Plan, even if not an objective of the current Government in the Strategic Transport Projects Review (STPR) and despite there being no agreed funding. Other desirable projects get mentioned without immediate funding or impending implementation. These include Berriedale Braes A9 improvement. Proposals for rail and road should be dealt with in an even-handed way.
- Unable to accept recent officially sponsored studies suggesting that the Dornoch Rail Link scheme could not now be delivered at a favourable cost-benefit ratio, based on a simple Transport Economic Efficiency analysis with no socio-economic benefit consideration. The recommendation of the independent report on the scheme by MVA/Corus "That the Dornoch Rail Link has the greatest merit on the initial STAG 1 appraisal in meeting the widest range of the Government's objectives. It should go forward to be appraised at STAG 2 level" has never seriously been challenged by any informed opinion.

(20, 42, 536, 227, 406, 417, 423, 425, 435, 440, 446, 448, 455, 474, 498, 512)

### **Areas for Potential Safeguard from Development**

Concerned regarding the planning policy framework for the immediate area surrounding Loch Watenan, Ulbster. Any development would have a significant deleterious effect on the loch's sustainability as a resource for a variety of wildlife. The present planning status does not reflect these concerns. (410)

The Yarrows is not mentioned in the Plan as a heritage landscape of international significance. It is currently recognised in the Structure Plan and the Caithness Local Plan. The importance of Caithness archaeology should be linked to economic development and the Yarrows landscape maintained. It is also an important landscape for falconry. (521)

It is vital to take into consideration that the local people of Highland are stewards of some of the best wild landscapes in Scotland, which are an integral part of the identity of all Scots. Highlanders are the custodians, not only for themselves, but for Scots as a whole. Where a resource or feature that may be affected is of national or international importance, this level of interest may not always be wholly reflected through relying solely on geographically local people. With respect to having a "high quality tourist industry," safeguarding the environment as part of that is relevant and will be important to success. (2)

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

### **General Points on Vision and Spatial Strategy**

Strengthen the Plan by better defined priorities; set out an alternative vision, based on the natural assets of the area, of a place where resources are concentrated on developing the best site for servicing offshore renewables and the rural hinterland is reclaimed by nature with scattered Scandinavian style houses for seasonal occupancy placing minimum demand on services and infrastructure. (453)

Make a high quality tourist industry top priority. (83)

Highlight in para. 5.2.1 the exceptional potential of the Highlands as a renewable energy location, address how this is to be realised through the development plan and include recognition of the 'do nothing approach' with regards to national and international targets. (449)

Add a few place names to the Caithness and Sutherland figure 1 map to assist the reader. (5)

Include the expansion of settlements, including Castletown, as part of a comprehensive proposal for the sustained growth of the area and identify Castletown as a Local Centre. (532)

Include reference to the role of aquaculture in economic diversification and to its contribution towards achieving sustainable communities. (404)

Include reference to provision for cycleways. (168, 533)

### **Marine Renewables and Associated Onshore Development**

Clarify figure 1 to indicate more clearly the intended strategic role(s) of Dounreay. (26)

Seek explicit mention of wave and tidal sector development within Pentland Firth and Orkney Waters in the Plan and the associated Action Programme, including an action for preparation of a Pentland and Orkney Waters Development Brief. (190)

Include within the Plan an enabling policy framework to support the marine renewables industry and related facilities and industries specifically. (268)

Clarify what is being referred to by "potential offshore renewable energy" in Figure 1. (83, 118)

### **Onshore Renewables**

Caithness/Sutherland vision and spatial strategy should make reference to a wider range of renewable energy opportunities available in the area, including

onshore renewables, indicating their benefits and potential contribution to national targets. (164, 270, 449)

Ensure adequate protection of Caithness and particularly the Caithness and Sutherland Peatlands from windfarm development. (537)

### **Dornoch Rail Link / Far North Line**

Add in explanation as to how the vision for a 'connected and accessible place' (para. 5.2.1), including increased passenger numbers on the Far North Line, and an 'improved rail connection' (figure 1) will be achieved.

Add in to the vision an aspiration to reduce rail journey times between Caithness and Inverness by some means: the 3<sup>rd</sup> bullet point in the vision should be amended by continuing the sentence ending at "Bonar Bridge" adding the words "and significant reductions in journey times between Caithness and Inverness".

Add in to the Plan reference to support for and promotion of the Far North Line, including potential Dornoch Rail Link at least as an aspiration, and one representor explicitly asks for the 'route' of the DRL to be included in the Plan whilst another seeks inclusion of a degree of safeguarding of the potential DRL in the consideration of development proposals.

(20, 42, 536, 227, 406, 417, 423, 425, 435, 440, 446, 448, 455, 474, 498, 512)

### **Areas for Potential Safeguard from Development**

The development plan should give Loch Watenan and its surrounding areas complete protection from further development. (410)

Protection should be afforded to the Yarrows heritage landscape in Caithness, linked to economic development aims for the area. (521)

## **Summary of responses (including reasons) by Planning Authority:**

### **Economy and Regeneration**

The support expressed for these aspects of this part of the Plan is welcomed.

### **General Points on Vision and Spatial Strategy**

The support expressed for general aspects of this part of the Plan is welcomed.

The Plan and the [existing local plans within Highland](#) all support the concept of a hierarchy of settlements. With the exception of the Tornagrain new settlement proposal, all these plans allocate sites and direct future public

infrastructure investment consistent with and proportionate to the size of the settlements in this hierarchy. It should be noted though that much of Highland's population has traditionally been sparse and remote. It may be more cost efficient per person in infrastructure terms to coax and concentrate them into larger communities but this runs contrary to Highland's tradition of dispersed settlement. Sustainability is a particularly difficult concept to apply to some rural areas. Improved technology provides a partial answer to this peripherality. The intention is to nurture the marine renewables industry; specialist engineering is relevant to that and the area is already valued for its offer. The Plan therefore has appropriate priorities, vision and spatial strategy for the area.

The Council is progressing Habitats Regulations Appraisal of the Plan, and the views expressed about particular aspects of the Plan that should be looked at as part of that appraisal have been noted.

Whilst the Council agrees that tourism will be important to the area, hence its inclusion in the list of sectors indicated in the Vision, the sectors are not in any priority order and the Council does not consider it appropriate to define a priority order.

The Council has responded to the issues raised about broadband in its response to representations on Policy 46 Communications Infrastructure (Issue 46). No changes are required to any part of the Plan.

The Plan already provides general policy coverage on the issue of aquaculture and parts of Sutherland are covered by [Aquaculture Framework Plans](#) which provide detailed locational guidance. Nevertheless, if the Reporter sees fit then the Council would support a brief, specific reference to the importance of aquaculture within para. 5.2.1.

Regarding the provision of cycleways, sufficient policy coverage is offered elsewhere in the Plan (in general policy 57 Travel), in [area local plans](#) and in the Council's [active travel plans](#), as explained in response to representations on policy 57.

As indicated elsewhere in this response, it is commended that the map in figure 1 be clarified, although its scale and diagrammatic nature means that it would be difficult to show place names and they would imply locational accuracy which may be unfounded.

In response to representations on Policy 41 Retail Development (Issue 41), the Council has suggested to the Reporter the addition to the Plan of an appendix which sets out the settlement hierarchy, or otherwise preparation of Supplementary Guidance. Consideration of that provides opportunity for the position of Castletown in the hierarchy to be considered, based on an assessment methodology. The role of settlements and settlement growth is already a key strand of the Plan's approach to managing sustainable development.

The vision and spatial strategy does not prevent sustainable renewable

energy development that is separated from communities.

In response to representations on Policy 68 Renewable Energy Developments (Issue 68), the Council has agreed to inclusion of the proposed HVDC cable from Caithness to Moray in the map (figure 1). This is commended below.

### **Marine Renewables and Associated Onshore Development**

The Council is working with the Princes Foundation for the Built Environment and HIE on a North Highland Vision for marine renewables. It is focussing on the potential infrastructure and support industry requirements for this very important sector and will lead to the preparation of any necessary associated Supplementary Guidance as referred to in the final paragraph of Policy 42 Business and Industrial Land. It is not necessary to provide further amendment of the policy framework in the Plan, but it would be helpful to include reference to this work in the supporting text to Policy 68 Renewable Energy Developments and this is commended in the Council's response to representations on Policy 68 Renewable Energy Developments (Issue 68).

Policy 68 and other general policies of the Plan, together with marine planning work being undertaken by Marine Scotland for the area, will provide a basis for assessing and coming to an opinion on marine renewables proposals themselves.

The remarks about the map in figure 1 are noted. The map is somewhat diagrammatic and, at this scale, is not intended to show the precise location of facilities, etc. Nevertheless a number of these do relate to specific, known locations. For example there is reference to specific settlements listed in Policy 42 where there are existing industrial and business sites.

The notation "Offshore renewables base" in the vicinity of Dounreay on the map is actually intended to flag Scrabster Harbour near Thurso, and that of "Industrial sites of national importance" in the vicinity of Dounreay on the map is actually similarly intended to flag sites at Thurso. The notation "Potential offshore renewable energy" is not indicating the proposed route of a cable but rather is intended to flag the generality of the potential along the north coast and beyond for marine renewables.

The Council therefore commends (below) clarification of the map (figure 1) and where necessary the related text, particularly with regard to the intent for offshore renewables and offshore bases.

### **Onshore Renewables**

The Highland Vision in the Plan and the supporting text to Policy 68 Renewable Energy Developments between them do reference renewable energy in general terms and the importance of the energy sector, whilst the [Highland Renewable Energy Strategy \(HRES\)](#) clearly indicates the potential

of the area, acknowledging Highland's extensive resource. The Caithness and Sutherland Vision and Spatial Strategy of the Plan refer in particular to marine renewables due to the need to respond to this emerging industry and given the particular focus of it in that area of Highland. The potential of other technologies, in particular onshore wind energy is a Highland-wide issue.

The [Onshore Wind Energy Supplementary Guidance](#) which has recently (April 2011) been published by the Council as a draft for consultation will bring forward the spatial framework for windfarms. Preparation of it has been informed by a landscape and visual impact study at the strategic level. It will provide appropriate consideration, including any safeguard, to constraints including designated and non-designated sites. The Caithness and Sutherland Peatlands is subject of designations for their internationally important nature heritage.

### **Dornoch Rail Link / Far North Line**

As indicated in the Council's response to representations on Policy 57 Travel (Issue 57), whilst the current [Strategic Transport Projects Review](#) (STPR) does propose some minor generic improvements to the rail network in the Highland area, such as the replacement of Radio Electronic Token Block signalling, the STPR does not contain any proposals for specific improvements north of Inverness, such as the Dornoch Rail Link. Despite this project being promoted by a campaigning group with some wider support, it would not attract the support of or funding from the Scottish Government during the period of the plan.

As such, the Plan's vision and spatial strategy is not dependent upon the delivery of significantly reduced journey times on the Far North Line. To include such in the vision would indicate such a dependency and there is no commitment on the part of Transport Scotland or Network Rail to delivering it.

The Plan may assist towards achieving significant increases in passenger numbers and rail freight by seeking to promote patterns of travel-generating development that enable travel/ transport choice and by taking a positive approach to proposals that would make use of rail as part of sustainable developments.

The generic improvements referred to in the STPR, in combination with increased useage levels of the line, could enable improved levels of service and go some way to improving rail connections.

Similar representations have been considered in previous development plan inquiries and most recently in the [Examination for the current Sutherland Local Plan](#) (see Report of Examination, pages 242-249). The reporter in that recent examination agreed with the Council's position to not protect a route for the Dornoch Rail Link.

The Plan makes reference to envisioning delivery of an improvement scheme for the A9 at Berriedale Braes. The Scottish Government have recently been

working with the Council to carry out a ground investigation at the Berriedale Braes, to establish the feasibility of improving the road alignment at the north hairpin. The inclusion of reference to future improvement of the A9 at Berriedale Braes in the Proposed Plan reflects the importance that the Council attaches to achieving such an improvement, particularly on safety grounds. Such potential improvements are not to be confused with other, possibly much larger and more costly, road improvement ideas for Berriedale Braes that have been discussed in the past.

The Council's position is that no changes should be made to the Plan in response to representations on the matter of the Dornoch Rail Link / Far North Line.

### **Areas for Potential Safeguard from Development**

The general policies of the Plan provide a sufficient framework for assessing potential impacts of development proposals in the area around Loch Watenan, for example in terms of landscape, habitats and species considerations. Additional policy safeguard could be provided through the designation of a nature conservation site specifically if the site were assessed as being of sufficient value to warrant such an approach, but that is not a matter for the Plan itself to progress.

In respect of the Yarrows landscape, where there are natural, built or cultural heritage features then these are subject of protection under general policies of the Plan. Policy also enables consideration of impacts on landscape generally. Development of the future Caithness & Sutherland 'Area' LDP (referred to in the Council's [Development Plan Scheme](#)) will provide opportunity to propose any more specific economic development opportunities arising from the value of this specific area. No change is required to the HwLDP.

### **Any further plan changes commended by the council**

Clarification of the map (figure 1) and where necessary the related text, particularly with regard to the intent for offshore renewables and offshore bases.

Add in to the map (figure 1) the proposed HVDC cable from Caithness to Moray.

### **Reporter's conclusions:**

Added by Reporter at later date.

### **Reporter's recommendations:**

Added by Reporter at later date.