Appendix A: Summary of Comments on CaSPIan Main Issues Report and Additional Sites and Issues Consultations, Interim Position Agreed by Area Committee and Recommended Council Response

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Site References

The table below shows the site referencing as it has evolved from Main Issues Report to Proposed Plan stage. Below the table are the summary of comments and recommended Council response.

MIR ID*	MIR name	PP ID**	PP Site Name	
LY01	South of golf club house	LY03	South of Golf Club House	
LY02	East of Main Street	LY02	The Cross	
LY03	West of old police station	LY01	Young Crescent	
LV01	Former sheep pens north of Inver Park	LV01	Former sheep pens north of Inve Park	
LV02	Cnoc A Mhuillin	LV02	Cnoc A Mhuillin	
LV03	Canisp Road	LV03	Canisp Road	
LV04	West of Coast Guard Station	LV05	West of the Coast Guard Station	
LV05	Culag Harbour	LV06	Culag Harbour	
LV06	Land adjacent to Assynt Leisure Centre	LV07	Land Adjacent to Assynt Leisure Centre	
LV07	Woodland huts in Culag Wood	LV04	Culag Wood	
TG01	South of Loyal Terrace	TG01	South of Loyal Terrace	
TG02	West of Varrich Place	TG02	North of Varich Place	
TG03	South of St Andrew's Church	TG04	South of St. Andrew's Church	
TG04	west of the Fire Station	TG03	East of the Fire Station	
TG04	west of the Fire Station	TG05	North of the Fire Station	
HD01	St John's Church	HD01	St John's Church	
HD02	East of Industrial Estate	HD05	East of Industrial Estate	
HD03	North of Rockview Place	HD02	North of Rockview Place	
HD04	Shore Street	HD04	Shore Street	
HD05	Simpson Crescent	HD03	Simpson Crescent	
AG01	Adjacent to Primary School and North of Church Street	AG01	Adjacent to Primary School and North of Church Street	
	Lady Ross	AG02	Lady Ross	
AG02	Ardgay Railway Station Yard North	AG03	Ardgay Railway Station Yard North	
AG03	Ardgay Railway Station Yard South	AG04	Ardgay Railway Station Yard South	
BB01	Cherry Grove	BB01	Cherry Grove	
BB02	South Bonar Industrial Estate	BB02	South Bonar Industrial Estate	
BR01	East Brora Muir	BR03	East Brora Muir	
BR02	Rosslyn Street	BR01	Rosslyn Street	

BR03	Old Woolen Mill	BR02	Old Woollen Mill
BR04	Former Radio Station	BR04	Former Radio Station
BR05	Scotia House	BR05	Scotia House
BR06	Former MacKay's Garage	BR06	Former MacKay's Garage
BR07	Adjoining Industrial Estate	BR08	Adjoining Industrial Estate
	Upper Fascally	BR07	Upper Fascally
DN01	Dornoch North	DN04	Dornoch North
DN02	Dornoch South Abattoir	DN03	Dornoch South Abattoir
DN03	Dornoch Business Park	DN07	Dornoch Business Park
DN04	Bishopsfield	DN02	Bishopsfield
DN05	Meadows Park Road	DN01	Meadows Park Road
DN06	Adjacent to Dornoch Academy	DN06	Adjacent to Dornoch Academy
DN07	Meadows Park	DN05	Meadows Park
ET01	North-east of Haven	ET01	North-east of Haven
ET02	Adjacent to Glebe Cottage	ET03	Adjacent to Glebe Cottage
ET03	West of Station Road and Balleigh Road	ET02	West of Station Road
GP01	Drummuie	GP03	Drummuie
GP02	Golspie Business Park	GP06	Golspie Business Park
GP04	Mackay House Hostel site	GP04	Mackay House Hostel site
GP05	Woodland Way	GP01	Woodland Way
GP06	Sibell Road	GP02	Sibell Road
GP07	Rhives	GP05	Rhives
LA01	Old Sutherland Arms site	LA03	Old Sutherland Arms site
LA02	South-west of Ord Place	LA07	South-west of Ord Place
LA03	North-west of Ferrycroft	LA05	North-west of Ferrycroft
LA04	Former laundry	LA04	Former laundry
LA05	West of Church Hill Road	LA06	West of Church Hill Road
LA06	Opposite Fire Station	LA02	Opposite Fire Station
LA07	South-west of Main Street	LA01	South-west of Main Street
CT01	Land between Castletown and Castlehill	CT06 CT02	Land at Shelley Hill Castlehill Steading
СТ02	Land at Castlehill Gardens	СТ03	Former Castlehill Gardens
СТ03	Castletown Mill	CT04	Castlehill Mill
CT04	Land North of Harland Road	CT01	Land North of Harland Road
CT06	Site South East of Coronation Place	CT05	Former Free Church, Main Street
СТ09	Former Icetech site	CT07	Former Icetech Site

HK01	South of Comlifoot Terrace	HK01	Comlifoot Drive
HK02	Site at Camilla Street	HK05	Site at Camilla Street
HK03	Glebe land at Halkirk Old Parish Church	НК03	North East of Old Parish Church
		HK02	West of Bridge Street
		HK04	South West of Ulbster Arms Hotel
TS01	Land at Scrabster Mains Farm	TS16	Land at Scrabster Mains Farm
TS02	Scrabster Harbour	TS15	Scrabster Harbour
TS03	Land North West of Thurso Business Park	TS17	North West of Thurso Business Park
TS04	Land North West of Provost Cormack Drive	TS04	Thurso West
TS05	Land West of Bishops Drive	TS03	West of Upper Burnside
TS06	Land west of Pennyland House	TS04	Thurso West
TS07	Thurso Harbour	TS13	Thurso Harbour
TS08	Former Mart Site	TS05	Former Mart Site
TS09	Viewfirth Park	TS11	Viewfirth Park
TS10	Former Mill Site at Millbank	TS06	Former Mill Site at Millbank
TS11	Land East of Juniper Drive	TS01	East of Juniper Drive
TS12	Land at Sir Archibald Road	TS07	Land at Sir Archibald Road
TS13	Land at Bridgend	TS08	Land at Bridgend
TS14	Site at Mountpleasant	TS02	Site at Mountpleasant
TS15	Land North of Scrabster Community Hall	TS09	North of Scrabster Community Hall
TS16	Land North West of Dunbar Hospital	TS10	North West of Dunbar Hospital
TS18	Land north of Pennyland House	TS14 TS12	Land West of Caravan Park East of Burnside
WK01	North of Wick Business Park	WK21	North of Wick Business Park
WK02	Wick Business Park	WK20	Wick Business Park
WK04	Land South East of Wick Airport Terminal Building	WK08	South East of Terminal Building
WK05	Land North of Wick North Primary School	WK09	North of Wick North Primary School
WK06	Land North of Wellington Avenue	WK10	North of Wellington Avenue
WK07	Wick Harbour	WK22	Wick Harbour
WK08	Wick Industrial Estate	WK23	Wick Industrial Estate
WK10	Land at Shore Road	WK11	Site at The Shore
WK11	Lower Pulteneytown	WK12	Lower Pulteneytown

WK12	Land East of Wick Burial Ground	WK19	East of Wick Burial Ground
WK13	Land North of Green Road	WK13	Land West of Green Road
WK14	Hillhead Primary School	WK14	Hillhead Primary School
WK15	Wick High School Building	WK15	Wick High School Building
WK17	Land at Francis Street	WK16	Land at Francis Street
WK18	Land West of Coronation Street	WK06	West of Coronation Street
WK19	Land at Hill of Man	WK01	Hill of Man
WK20	Site South of Kennedy terrace	WK02	South of Kennedy terrace
WK21	Site East of Carnaby Road	WK03	East of Carnaby Road
WK22	Land South of Roxburgh Road	WK17	South of Roxburgh Road
WK24	Land North West of Seaview House Nursing Home	WK04	North of Coghill Street
WK25	Site West of Former Garage, George Street	WK18	West of George Street
WK27	Land at Broadhaven Farm	WK07	Land at Broadhaven Farm
WK32	East of Police Station	WK05	West of Police Station

* MIR ID= Main Issues Report Identification

** PP ID= Proposed Plan Identification

Issue 1 a & b: The Vision and Strategy for Caithness & Sutherland

Main Issue	The Vision and Strategy for Caithness & Sutherland		
MIR reference:	Questions 1a and 1b		
List of respondents (in	cluding customer number):	
List of respondents (in A&H Gordon (4942) Alexander Thomson (47 Alison Kirk (4711) Allan Tubb (5122) Altnaharra Estate Ltd. (4 Amelia Walker (4798) Andrew Gunn (3621) Ann Williams (4767) Ardgay & District Comm Assynt Tourism Group (6 Balnagown Estates (511) Ben MacGregor (4697) Bill Badger (5021) Brian Johnston (2073) Caithness Chamber of (7 Caithness Horizons (207) Carol Paterson (3304) CH Architecture (4742) Colin Moore (5092) Colin Paterson (2032) Culgower House B&B (5 Diana Johnston (4937) Donald Robson (5078) DP Marine Energy (5086) Duncan Allen (5058) Elizabeth Mackay (5094) Forestry Commission So Fran Simmons (5130) G. C. Walker (3655) Gail Brown (5129) Garry Calder (4794) Gayle Rennie (3603) George Campbell (239) George Mitchell (4688) Gill Arrowsmith (4934) Golspie High School Pa Graham Dougall (4838) Hamish Robertson (5077) Infinergy (5108) Jamie Henderson (4771) Jan Thomson-Fraser (47) Jerry Bishop (3665) Jill Falconer (3666) Joan Bishop (4896) John Barkham (4898)	29) 4579) unity Council (326) 4938) 5) Commerce (5119) 14) 5082) 5) 0082) 5) cotland (4692) rent Council (4723) 9))): John Cormack (2106) John Ferguson (4698) Kathleen Cunningham Kenneth Nicol (4944) Liz Rollings (4682) Lydia Popowich (4728) Marion Turner (2276) Martin Baker (4787) Martin Bridge (4724) Martin Sutherland (484) Melanie Spirit (4837) Network Rail (4974) Ngaire Mingham (5097) Reay Clarke (4929) Rhys Reid (5066) Robert Falconer (4948) Robert Wylie (4684) Rosehall & District Act Rosemary MacRae (46) Roy Lambert (4681) Russell Smith (4930) S. Blance Associates I Scott McLean (4931) Scottish Environment F (3115) Scottish Natural Herita Scottish Southern Elect Scottish Water (396) Simon Stevens (4676) SportScotland (2087) Stuart Andrew (4840) Terry & Jane Clarke (33 The Abbey Group (513) The Crown Estate (483) The Highland Council The Mountaineering C (4687) The Scottish Governm The Theatres Trust (50) Thurso Bay Trading Co Ulbster Arms Ltd. and (184) William Marshall (3629) Zelda Chaikin Linekar	(4699) (4699) (44) (44) (44) (44) (44) (44) (44) (44) (4976)

Summary of comments received:

Of those respondents that indicated their opinion to the multiple choice options on the preferred vision (191 respondents): 23% strongly agreed 41% agreed 18% were neutral 11% disagreed 3% strongly disagreed and 4% didn't know

Of those respondents that indicated their opinion to the multiple choice options on the preferred strategy (185 respondents):

20% strongly agreed
42% agreed
17% were neutral
12% disagreed
4% strongly disagreed and
4% didn't know

Vision

Some positive feedback about the Vision (outcomes) stating that it focusses on key areas that need to be improved to sustain the area. However, a number of concerns and suggestions for strengthening were also received.

It was thought that the Vision could be stronger on: the environment in general; encouraging tourism; safeguarding local culture; long term sustainable employment; telecommunications; transport infrastructure; the importance of connections to the global economy; the potential economic role of Georgemas; local health service requirements; education; disability equality and access; creative industries, farming, crofting, forestry and offshore renewables opportunities.

There were some concerns expressed about the Vision: that a protectionalist attitude could hold the area back; the environment and heritage outcome does not refer to the environment and it should refer to "outstanding" rather than "high quality"; that it focuses on towns and villages with little on countryside opportunities; that it relies too much on the renewables sector; that it doesn't recognise the oil and gas sector specifically; that the impacts of onshore wind energy development are of concern; that onshore wind energy opportunities should be acknowledged specifically; that more is needed on how the Vision will be measured or assessed.

Comment received that the alternative vision – carrying forward the Highland wide Local Development Plan vision for Caithness and Sutherland – was more meaningful and specific.

Strategy

Some positive feedback on the strategy and map.

It was thought that the Strategy needed greater clarity: the meaning of the notations on the map and what these meant for the consideration of development proposals; whether the symbols on the map were broadly illustrative or specific; the map does not cross reference the outcomes; there would be a clearer relationship if the strategy items were listed under the four outcomes headings.

It is unclear what sectors are being referred to in the energy business expansion area. Some concern about identifying a significant part of Caithness and the potential negative impact on tourism.

It is unclear what the strategy envisages being developed along the Sustainable Rural Development Corridor.

There were a number of suggestions for additions or amendments: more needed on the assets and opportunities of the Kyle of Sutherland and the 'interior', including connections across the area; National Cycle Route 1 to be highlighted more and identified as a tourism corridor similar to the east coast; the north coast should be highlighted as a tourism corridor; the sustainable rural development corridor should be applied to all the main road routes in Sutherland or even all of Sutherland; grid connections to be added; green networks to be added; addressing coastal erosion; transport infrastructure should be improved throughout the plan area and not just along the east coast; the map underplays the extent of protected natural heritage areas and no mention of Flow Country; another tourism cluster should be identified in the Brora/Golspie area.

The preferred strategy could be stronger with regard to the role of renewables and offshore renewables. It would be appropriate for the Strategy to pick up on the energy hub area of coordinated action as identified for the Pentland Firth and Orkney Waters in National Planning Framework 3.

The key settlements indicated on the Assets and Strategy Map incorporates the Settlement Development areas and the Growing Settlements which does not suggest a priority weighting for where development should be focused.

Priority should be on long term and sustainable jobs.

Focussing new development within principle growth areas and increasing the vibrancy of town centres is key.

There is too much emphasis of the development of towns rather than all settlements.

A new element should be added to the strategy: To protect and enhance community facilities. Interim position agreed by Area Committee:

There was broad agreement with the Vision 'outcomes' presented in the MIR (62% of 185 respondents either agreed or strongly agreed), so we do not anticipate changing these significantly. The strategy in the MIR is proposed as the way to deliver the 4 key outcomes set out in the vision for the plan. There were lots of comments on the vision and the strategy. Many were supportive of both, others raised concerns and some suggested changes. In preparing the Proposed Plan consideration will be given to the comments received, whilst ensuring that they continue to reflect the priorities identified in the Community Planning Partnership's Single Outcome Agreement.

The Strategy Map is intended to illustrate existing assets and the strategy for the future. In our view it could be made clearer and we will state when the symbols on the map are broadly illustrative or specific. Elements of the strategy will be explained and more clearly defined where necessary. Suggested amendments and additions will be considered. Key assets and opportunities in Central Sutherland will be identified on the map.

Recommended Council Response:

As per interim position outlined above, subject to the following:

Vision

As explained under the response to Issue 3, the Employment outcome has been reworded as follows:

"A strong, diverse and sustainable economy characterised as being an internationally renowned centre for renewable energy, world class engineering, land management and sea based industries and a tourist industry that combines culture, history and adventure."

The Growing Communities outcome has been simplified as follows:

"A network of successful, sustainable and socially inclusive communities where people want to

live, which provide the most convenient access to key services, training and employment and are the primary locations for inward investment."

The Environment and Heritage outcome has been amended as follows:

"High quality places where the outstanding environment and natural, built and cultural heritage is celebrated and valued assets are safeguarded."

NB. The Connectivity and Transport outcome remains unchanged.

Strategy

We have reworked the Strategy map and provided new and improved explanatory text to provide clearer explanation of the intention of certain elements of the strategy, with some amendments. The Strategy map in the MIR included representation of assets of the area, but the Proposed Plan version focusses more on depicting the main aspects of the strategy itself.

Specific amendments and additions include:

- Indicating the broad locations of SDAs, Growing Settlements and EDAs on the strategy map by those categories;
- Reflecting the addition of Invershin, Rosehall, Melness and Thrumster as Growing Settlements;
- Reflecting the addition of Forss Business and Technology Park, Georgemas Junction, Janetstown Industrial Estate and Seater Strategic Waste Management Facility as additional Economic Development Areas;
- Adding indication of Green Network Connections as a strategic priority for all Settlement Development Areas and Growing Settlements;
- Acknowledging the strategic significance of the National Cycle Network and the North Coast 500;
- Reflecting the priorities of NPF3 for a Digital Fibre Network, a High Voltage Energy Transmission Network and (in the text) the Area for Co-ordinated Action for the Pentland Firth and Orkney Waters;
- Adding an Area for Coordinated Tourism Connections as a specific priority for the Kyle of Sutherland/ Central Sutherland area;
- Explaining that the Area for Energy Business Expansion is intended to cover opportunities for businesses that service the energy sector and is not intended to imply energy development itself widely spread across the area;
- Redescribing the strategic priority for the north-west of the plan area as "Area for Flexible Community-led Development";
- Explaining the role of the strategy, the relevance of the strategy map including areas shown and how the Plan guides development throughout Caithness and Sutherland.

General

A section in the Plan on 'Delivering Development' will support the delivery of the strategy and the requirements for delivering specific land allocations.

The Council has a duty to monitor the Plan. This monitoring will feed into a Monitoring Statement that will inform review of the Plan in due course. Monitoring of our Area Local Development Plans, including CaSPlan, is part of a package that also includes monitoring of the HwLDP.

Issue 2a: Housing needs in Caithness & Sutherland

MIR reference:Question 2aList of respondents (including customer number):Alexander Thomson (4729)John Barkham (4898)Alison Kirk (4711)John Campabell (5126)Allan Tubb (5122)John Cormack (2106)Altnaharra Estate Ltd. (4579)John Ferguson (4698)Amanda Robertson (4899)John Inkster (4696)Andrew Gunn (3621)Les Mason (4770)Andrew Smith (4703)Lydia Popowich (4728)Angew Smith (4703)Lydia Popowich (4728)Angew Smith (4703)Lydia Popowich (4728)Angew Smith (4703)Lydia Popowich (4837)Balnagown Estates (5115)NDA Properties Ltd. (5128)Ben MacGregor (4697)Ngaire Mingham (5097)Bill Badger (5021)Pierre Bale (4683)Brian Johnston (2073)Reay Clarke (4929)Caithness Horizons (2014)S. Blance Associates Ltd. (4976)Catherine Stewart (5095)Scottish Water (396)Colin Moore (5092)Simon Stevens (4676)David Doohan (3650)SportScotland (2087)David Walker (44845)Stephen Foster (3678)Durness Community Council (348)The Crown Estate (4380)Durness Community Council (348)The Crown Estate (4380)Durness (5130)Ulbster Arms Ltd. and River Thurso Ltd. (184)Gail Brown (5129)William Marshall (3629)Gayle Rennie (3603)William Marshall (3629)Hamish Robertson (5079)Zelda Chaikin Linekar (4706)Jan Thomson (5120)Zelda Chaikin Linekar (4706)	MIR Issue	Housing needs in Caithness & Sutherland		
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Summary of the comments received:	Jerry Bishop (3665)	,		

Summary of the comments received:

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to meeting housing land requirements (166 respondents):

29% agreed the approach will meet housing land requirements 37% thought the approach might meet housing land requirements 10% though the approach will not meet housing land requirements, and 24% didn't know

The key issues raised include:

Some support for the preferred approach.

Respondent questions how the approach will change if the housing land requirements go up or

down. States that up-to-date housing land requirement information must be used and not the current 2009 HNDA. Housing demand projections are complex and difficult to validate. Sutherland should be considered as two distinct housing areas. Greater housing land is required in the east than in the west.

Many respondents question the need for new housing (particularly in Caithness) with a declining economy and changing demographics. Some highlighted that the focus should be on attracting employment investment to the area.

There are many empty properties in Caithness. Suggestion that there should be a policy for reusing houses rather than developing onto greenfield land. Development of greenfield land over brownfield land also detracts from the appearance of the area.

Consideration should be given to allocating land for whole new communities rather than expanding existing ones.

Support for housing in and around settlements rather than in the countryside which require greater dependence on vehicular transport and service provision.

Arguments given for supporting rural housing development and smaller scale housing options.

Interim position agreed by Area Committee:

The Development Plan is tasked with identifying a generous land supply for new homes. This is based on the results of the Housing Need and Demand Assessment (HNDA). Since the MIR was published the Council has been updating its HNDA. This process is ongoing, but preliminary indications are that the needs for new housing will be similar but lower than previously anticipated. The MIR 'preferred sites' already identified a generous supply of housing land to ensure flexibility of effective sites across settlements and to support the economy to grow and to support regeneration. Officers consider that overall a generous supply is suitable and can be justified, but the Council does need to be mindful of the extent of 'oversupply'. We are therefore minded to avoid further increasing that supply, whilst also looking to phase larger sites and identify some areas as longer term. This will leave the option open for future plan reviews to allocate the land if, at that point, additional land is required.

Recommended Proposed Plan content:

Housing Demand/Supply

In response to concerns, particularly in Caithness, regarding the need for allocating housing land when the population is falling and the economy is declining:

Firstly, the Development Plan is tasked with identifying a generous land supply for new homes. This is based on the results of the Housing Need and Demand Assessment (HNDA). Since the MIR was published the Council has been updating its HNDA. This process is nearing completion, but preliminary indications are that the overall need for new housing will be lower than previously anticipated. We have published a housing background paper alongside the Proposed Plan as an addendum to the Monitoring Statement which highlight the latest position. The findings show that the Plan should identify a housing land supply for the next 20 years of 530 housing units in Caithness and 610 in Sutherland (a total of 1140 housing land required).

The Monitoring Statement showed that despite an expected fall in the overall population over the coming 20 years, additional new houses will still be required to meet the demand from mainly a combination of falling household sizes and, in Sutherland, eradicating the backlog of need for affordable housing.

HNDA – Reasons for High Growth Scenario

The HNDA figures show 'high' and 'low' growth projections. It is proposed that for the Caithness and Sutherland LDP the high growth scenario projections are the most suitable. This is due to the changing nature of the economy whereby several emerging growth industries have been identified. The waters around Caithness and north Sutherland have been shown to have around a quarter of

Europe's offshore renewable energy generation potential. Although the onshore wind and hydro industry has been progressing over the past 10 years, there is also significant potential for offshore wind. Due to its relatively remote location there is also potential for large scale location-sensitive developments, e.g. the nuclear energy development at Dounreay has reshaped the economy over the past 60 years.

There are some positive signs that marine renewables sector is starting to take off and will play a significant role in the economic future of the area. This includes: MeyGen reaching Phase 1A of the construction of the world's largest tidal energy project with funding identified for Phase 1B; Wick being confirmed as the service base for the construction of SSE's Beatrice offshore wind farm; planning permission being granted for industrial plots and new access at the Enterprise Area at Scrabster Farm.

The aim is also to continue to diversify the Caithness and North Sutherland economy. Growing the tourism industry is a key objective at a regional and national level. The tourism industry is also considered as being an underdeveloped asset which could generate significant numbers of jobs. Initiatives such as the North Coast 500 and Venture North are already helping to coordinate and promote the assets which exist across the north of Highland. Proposals such as those put forward by Wild Land Ltd during the Main Issues Report consultation also show the potential for large scale leisure/tourism development in more rural areas.

The growth of these sectors would bring new investment and job opportunities which could have significant effects on retaining young people and reversing the population decline.

Data on the level of housing completions also indicates that housing figures may be higher than the HNDA forecasts. The HNDA high growth scenario of 1,140 houses across Caithness and Sutherland equates to 57 completions per year. In 2014 a total of 107 new houses were completed which means that to reach the average completion rate of 57 per year then house building will need to decline dramatically over the 20 year period. Past trends do not fully support this scale of decline.

Exceeding the Housing Land Supply Target

There are several reasons for exceeding the 20 year housing land supply target which is identified in the latest HNDA.

Firstly, there are a large number of brownfield sites in the plan area which the Council is keen to promote for redevelopment. This reflects both a key aim of CaSPlan and SPP (2014) which states that development plans should direct development to brownfield land before greenfield. There are many brownfield sites in Caithness and as they often hold prominent locations their redevelopment could have wide ranging positive impacts on the settlement. Elsewhere in the country such sites may be identified by a local authority for specific uses. However, as the regeneration of these sites is a priority we have been more flexible in the list of acceptable uses, including housing, to encourage redevelopment.

In Wick, for example, planning permission exists for housing developments at Hill of Man (extant capacity of 55 houses), land south of Kennedy Terrace (extant capacity of 44 houses) and south of Carnaby Road (extant capacity of 23 houses) and north of Coghill Street (extant capacity of 45 houses), totalling approximately 167 houses. All of the remaining site allocations are brownfield sites within the town with a combined indicative capacity of 83 houses.

In Thurso/Scrabster, very little of the allocated housing land is new to this Plan. The majority of the housing supply is associated with the long term strategy for the expansion of the settlement to the west which has formed a central part of the development plan for at least 13 years. The housing land forms part of wider expansion which includes the delivery of short term and long term strategic transport infrastructure improvements together with opening the area up for much needed business and other commercial uses. Due to the level of development and the infrastructure (e.g. distributor/relief road) and facilities (e.g. public park) we are requiring a masterplan/development

brief to be prepared. Prior to the economic downturn there was developer interest in the site and a planning application was consented in 2006 for the extended site at Pennyland including 400 houses, business space and contributions towards the bypass. Although this has since expired the site requires a strategic planning approach. Several other sites in Thurso are brownfield sites which offer redevelopment and regeneration opportunities such as the industrial sites at the river and former mart site.

Many settlements of Sutherland are much more dispersed than elsewhere in Scotland. The settlements are also relatively small and so too is the level of growth forecast. However, it is essential that the key settlements are supported and strengthened to be more sustainable. As development is typically quite small scale, the housing land allocated needs to be flexible to ensure that areas which are constrained do not prohibit potential housing development. This helps ensure that housing demand is met and supports young people, families and elderly to remain in the area. Therefore, for more rural settlements we have also exceeded the HNDA housing land supply target.

Identifying Long Term Sites

Officers consider that overall a generous housing land supply is suitable and justified, but the Council is mindful of the extent of 'oversupply'. We are therefore minded to avoid further increasing that supply, whilst also looking to phase larger sites and identify some areas as longer term. This will leave the option open for future plan reviews to allocate the land if, at that point, additional land is required. These sites are not allocations and development will not be supported on them within the timescales of the Plan. Nevertheless it is intended that the long term sites will help to provide greater transparency regarding the longer term vision for the area.

Windfall

The Monitoring Statement showed the windfall rate varied across the Plan area. The majority of completions in Thurso and Wick were on allocated sites (74% and 62% respectively) and a significant proportion was on non-allocated land within SDAs. This shows that the majority of development has been in broadly sustainable locations including some which has been shown as windfall. The position in other settlements was variable with no particular trends with the size or location of settlement. The Housing in the Countryside Supplementary Guidance has also not been stringently applied in some circumstances and there is now a renewed focus on tightening up housing development in the countryside. A new approach is being put forward as part of the HwLDP review. As it is inappropriate to assume windfall development would continue at such a high level and to provide certainty over the supply of housing land we have adopted a slightly lower windfall rate of 20% across the Plan area.

Empty Properties

Empty properties have been an ongoing issue in certain parts of Highland. The ineffective stock of housing (includes second and vacant homes) in Caithness (6.1%) and Sutherland (16.3%) is higher than the national average. Second homes are much less of a problem in Caithness (2.8%) than in Sutherland (12%) but the vacancy levels are both higher than the Highland average (2.7%). In terms of vacancy rates much of this is due to properties requiring significant investment to bring up to modern standards. Many houses also do not meet the needs of the local demand, e.g. there is an oversupply of 1 bedroom public sector properties.

Distinct Housing Market Areas

Although the HNDA shows only two 'housing market areas' ('Caithness' and 'Sutherland') it is recognised that several sub-market areas could also be defined, e.g. dividing Sutherland into east and west. We agree with comments that a greater amount of housing land is required along the east coast and this is reflected in the Council's preferred sites in the MIR and the allocations taken forward in the Proposed Plan.

New Settlements

To strengthen existing facilities and services and create more sustainable communities the Plan aims to direct development to existing settlements. In places where there is significant demand for new housing, e.g. around Inverness (outwith the CaSPIan area), identifying land for a whole new settlement may be appropriate. Suitable sites which meet the expected housing demand have been identified within existing settlements Caithness and Sutherland. Therefore new settlements have not been included within the Plan.

Gypsy/Travellers

The Highland Gypsy Traveller Accommodation Needs 2014/15 report indicates that there has been "limited encampment activity over recent years" in Caithness and Sutherland. It was recorded that only 2 'prior/less frequent use' camps were located in the CaSPlan area, one in Wick and another north of Dornoch. Due to this low pressure the Plan has not sought to allocate land for a specific gypsy/traveller encampment.

Issue 2b: Managing Growth

MIR Issue	Managing Growth		
MIR reference:	Question 2b		
List of respondents (including customer number):			
Alexander Thomson (Alison Kirk (4711) Allan Tubb (5122) Altnaharra Estate Ltd. Amanda Robertson (4 Amelia Walker (4798) Assynt Tourism Group Balnagown Estates (5 Ben MacGregor (4697) Bill Badger (5021) Brian Johnston (2073) Caithness Horizons (2 Catherine Stewart (50) CH Architecture (4742) Christopher Murray (5) Durness Developmen G. C. Walker (3655) Gayle Rennie (3603) George Mitchell (4688) Grant Fairns (4677) Ian Walker (3658) Jan Thomson-Fraser Jerry Bishop (3665) Joan Bishop (4896) John Barkham (4898) John Cormack (2106)	(4579) 899) (4938) 115) 7) (014) 95) 2) 098) Council (348) t Group Ltd. (3618) (4712)	Liz Rollings (4682) Marion Turner (2276) Martin Sutherland (4844) NDA Properties Ltd. (5128) Pierre Bale (4683) Robert Falconer (4948) Rosehall & District Action Ga Roy Lambert (4681) Russell Smith (4930) S. Blance Associates Ltd. (4 Scott McLean (4931) Scottish Natural Heritage (24 Scottish Water (396) Simon Stevens (4676) SportScotland (2087) Stuart Nicholson (4725) Terry & Jane Clarke (3380) The Abbey Group (5133) The Crown Estate (4836) The Highland Council CPAM The Scottish Government (4 The Theatres Trust (5070) Ulbster Arms Ltd. and River William Walker (5076)	976) 04) 1 Team (3627) 616)
Summary of the com			
Of those respondents	that indicated their opi	nion to the multiple choice optic	ons on the suggested

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to managing growth (168 respondents):

20% strongly agreed with the approach 36% agreed 24% were neutral 8% disagreed 4% strongly disagreed, and 8% didn't know

Some of the key issues raised include:

Support for the Hinterland around Dornoch as it helps to avoid inappropriate development in the countryside.

Development should be focused towards existing settlements rather than in the wider countryside. Lack of information on improvements to community services in connection with anticipated growth in communities.

Due to the rural location many people have to use cars and cannot rely on public transport. Local communities should have a greater say in the way their communities develop.

Growth should be supported but the SDA approach is too prescriptive. More fragile communities should have greater flexibility.

Questions why many of the existing allocations have not been taken forward. Greater focus should be given on delivering development on the sites rather than providing alternatives.

Many business parks and industrial estates have vacant building and undeveloped sites. Several respondents question why more land is being allocated.

Support for Option 3 (existing approach) as take up of sites has been poor mainly due to the economic downturn. It helps provide certainty, reducing cost/risk in rural areas.

SNH are content with smaller settlements being covered by a general Growing Settlements policy but highlights that further guidance may be needed for it to ensure that development conforms with Housing in the Countryside policy. Reference is needed that development will need to accord with other general policies. It is noted that the Placemaking Priorities and Issues will be very important to ensure appropriate development.

Support shown for a more flexible approach rather than constraining development to allocated sites only.

Several respondents note the importance of protecting the landscape and natural heritage.

The Theatres Trust suggest that the Plan should recognise the role of 'community facilities' and seek to protect these facilities from development. 'Community facilities' should be included in the Glossary. Wording is suggested for inclusion in the Plan.

There should be opportunity for smaller communities to be 'growing communities'

Interim position agreed by Area Committee:

We note the general support for directing new development to existing settlements and town centres in the first instance. This should continue to be the basis for our strategy as it reflects both Scottish Planning Policy and the Council's Highland-wide Local Development Plan. We propose that the overall approach to managing development suggested in the MIR – including policies for Growing Settlements and for Promoting and Protecting Settlement Centres – can remain largely unchanged. It may be noted that similar policies have been confirmed for inclusion in the Inner Moray Firth Local Development Plan following the Examination process.

We prioritise development on brownfield land but due to the potentially high additional costs involved alternative greenfield sites need to be identified to ensure that important investment in the area is not discouraged.

Support for the existing hinterland boundary in Sutherland is noted and we do not propose to amend it.

Taking account of comments raised further detail may be added to the guiding criteria for individual Growing Settlements and Economic Development Areas. **Recommended Council Response:**

As per interim position outlined above, with the following additional comments:

• The Town Centre First Policy has been refined as part of the review of the HwLDP. It is proposed that this new version is included in CaSPlan. The overall aim of the policy remains the same but many of the details have been strengthened.

- The Council recognises the rural nature of the Highland area and the consequent transport issues. One of the key considerations of the Local Transport Strategy is rural accessibility. It focuses on addressing the cost of travel, investment in key settlements, tourism access and distances to petrol stations. As highlighted in paragraph 2.17 of the MIR we also encourage local communities, in agreement with the Council, to prepare their own community plans. This may allow rural communities to address issues such as local transport problems/solutions and have them form part of the wider strategy of the Council.
- We support the point made that the SDA approach may be too prescriptive for some smaller settlements. That is one of the reasons for the introduction of the Growing Settlements policy which provides a more flexible and organic approach for certain smaller settlements.
- Whilst the MIR indicated that we intended to define boundaries for Economic Development Areas (EDAs) we now propose that it is only necessary for Dounreay and Seater.

Issue 2c: Our Marine and Coastal Environment

MIR Issue	Our Marine and Coastal Environment		
MIR reference:	Question 2c		
List of respondents (including customer number):			
Alexander Thomson (47 Alison Kirk (4711) Allan Tubb (5122) Amelia Walker (4798) Assynt Tourism Group (Bill Badger (5021) Brian Johnston (2073) Caithness Chamber of C Caithness Horizons (207 Colin Moore (5092) David Walker (4845) Diana Johnston (4937) Donald Robson (5078) DP Marine Energy (5086) Durness Development C G. C. Walker (3655) Gary Parker (4739) Gayle Rennie (3603) George Mitchell (4688) Jan Thomson-Fraser (47 John Barkham (4898) John Cormack (2106) John Ferguson (4698) Kenneth Nicol (4944) Lesley Cranna (4846)	4938) Commerce (5119) 14) 6) Group Ltd. (3618) 712)	Liz Rollings (4682) Liz Wassall (4839) Lyndall Leet (3672) Martin Sutherland (4844 Melanie Spirit (4837) Migdale Smolt Ltd. (468 NDA Properties Ltd. (51 Pierre Bale (4683) Robert Falconer (4948) Robert Wylie (4684) Rosemary MacRae (469 Roy Lambert (4681) Scottish Natural Heritag Scottish Salmon Produc (5120) Scottish Southern Elect Scottish Water (396) Sheila Finlayson (3681) Sport Scotland (2087) Terry & Jane Clarke (33 The Crown Estate (4839 The Mountaineering Co (4687) The Theatres Trust (507 Thurso Bay Trading Co	30) 128) 93) ge (204) cers Organisation ric PLC (5109) 0 380) 6) uncil of Scotland 70)

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to marine and coastal development (165 respondents): 51% agreed with the approach

32% were neutral 9% disagreed, and 8% didn't know

General

Several respondents raised the potential for conflicts between oil & gas, marine renewables and traditional coastal and marine industries, suggesting a careful balance was required. A new community-owned harbour was suggested for Loch Eriboll, and it was suggested that CaSPlan should support marine-based tourism and develop existing harbours for ferry and cruise uses.

Marine Renewables

A large number of respondents were positive about the approach to supporting marine renewables, citing the importance of attracting this growing industry to the Plan area, and the potential jobs it could bring.

Several respondents supported the option for adopting the Pentland Firth and Orkney Waters Pilot Marine Spatial Plan, and several suggested the need for a bespoke offshore renewables policy,

some for a specific tidal energy policy, and it was suggested the Council invest in schemes as a means of generating revenue.

A number of respondents did not support the idea of identifying sites for onshore infrastructure for offshore renewables, stating that this could be premature and create an overly restrictive approach. The suggested alternative was for a policy-based approach, and respondents supported a HwLDP general policy rather than site-based allocations in CaSPlan.

Conservation and Environment

It was suggested that local groups and organisations should be engaged to identify key coastal and marine environmental issues; one suggestion was for a moratorium on coastal development, and some respondents suggested prioritising marine environmental protection.

Coastal erosion and the threats it poses to coastal communities were raised as an issue by some respondents, Golspie was mentioned specifically by some.

A moratorium on scallop dredging was also suggested.

Aquaculture

Several respondents highlighted aquaculture as an important industry in the Plan area. There was a suggestion for a bespoke policy on freshwater aquaculture.

Interim position agreed by Area Committee:

The approach to marine and coastal development does strive to balance competing interests, seeking to support tourism as well as traditional and new marine and coastal industries.

Issue 3 in the MIR notes that the *uncertain future needs of marine renewables* [means] *we may consider suitable proposals on non-allocated sites.* It is recommended that we continue with this flexible approach, whilst still ensuring current sites and opportunities for supporting the industry are recognised through CaSPlan.

It is recommended that the support for the CaSPlan approach to aquaculture and marine renewables, and adopting the Pentland Firth & Orkney Waters Pilot Marine Spatial Plan is noted. It is also recommended that marine and coastal environment issues raised are noted, but that these should continue to be safeguarded through relevant HwLDP policies and Supplementary Guidance.

In relation to the Pentland Firth & Orkney Waters Pilot Marine Spatial Plan, this will be an important document for growth of the sector and is now anticipated to be taken forward as non-statutory planning guidance.

Recommended Council Response:

As per the Interim Position outlined above, subject to the following:

The Plan provides an updated position on the now published National Marine Plan (March, 2015), acknowledging key elements relevant to Caithness and Sutherland, and highlights the Pentland Firth and Orkney Waters Pilot Marine Spatial Plan.

Issue 2d: A carbon CLEVER Caithness & Sutherland

MIR Issue	A carbon CLEVER (Caithness & Sutherland	
MIR reference:	Question 2d		
List of respondents (including customer number):			
Alexander Thomson (47 Allan Tubb (5122) Altnaharra Estate Ltd. (4 Amelia Walker (4798) Andrew Mackay (4705) Angus Mackay (5081) Assynt Tourism Group (Balnagown Estates (51 Ben MacGregor (4697) Bill Badger (5021) Brian Johnston (2073) Caithness Biodiversity (7 Caithness Horizons (20) Catherine Stewart (5098) CH Architecture (4742) Colin Moore (5092) Culgower House B&B (5 David Doohan (3650) Donald Robson (5078) DP Marine Energy (508) Durness Development (7 Elizabeth Mackay (5094) Fiona Doohan (5084) G. C. Walker (3655) Gayle Rennie (3603) George Mitchell (4688) Hamish Robertson (507 Harold Flane (5110) Ian Walker (3658) Infinergy (5108) Jan Thomson-Fraser (4 Jerry Bishop (3665) Jill Falconer (3666)	4938) 15) Group (4726) 14) 5) 5082) 6) Group Ltd. (3618))	John Cormack (2106) John Ferguson (4698) John Swanson (2112) John Swanson (5116) Kenneth Nicol (4944) Laid Grazings & Community Lesley Cranna (4846) Liz Rollings (4682) Liz Wassall (4839) Lyndall Leet (3672) Marion Turner (2276) Martin Sutherland (4844) Melanie Spirit (4837) Migdale Smolt Ltd. (4680) NDA Properties Ltd. (5128) Pierre Bale (4683) Robert Falconer (4948) Scottish Natural Heritage (2) Scottish Natural Heritage (2) Scottish Southern Electric P Scottish Water (396) Sharon Lennie (4745) SportScotland (2087) Stephen Foster (3678) Terry & Jane Clarke (3380) The Abbey Group (5133) The Crown Estate (4836) The Mountaineering Counci The Scottish Government (4 The Theatres Trust (5070) William Marshall (3629) William Walker (5076)	04) LC (5109)
John Barkham (4898) Summary of the comm	ents received:		

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to planning for a low carbon Caithness and Sutherland (170 respondents):

51% agreed with the approach 31% were neutral 10% disagreed, and 8% didn't know

Generally much support for the preferred approach to planning for a low carbon Caithness and Sutherland; however many do not want the emphasis solely on windfarms.

A large number of people do not want to see more onshore windfarm developments due to: the potential impact on the natural beauty of the area and potential knock-on effect to tourism; the large subsidies required to make them viable. General feeling that there are enough windfarms in Caithness and Sutherland.

General support for offshore wind generation and tidal development.

There were a number of suggestions for additions and amendments: the Council should take the lead in imposing higher insulation standards for any new or modified buildings; rising sea levels; no more large developments on peatlands such as forestry and windfarms; carbon clever transport possibilities such as public transport timings to allow connectivity of services and park and ride/share facilities; encouraging a wood fuel industry within Sutherland rather timber being transported out of the area for processing; encourage energy hungry industries to the area; nuclear technology; plan should ne aiming for zero carbon not low carbon; more trees should be planted; strengthen requirement for heat maps to be use din preparation of LDPs.

There is no mention of a policy for solid waste disposal and how it will be managed.

Low zero carbon heating systems should be encouraged however there is risk involved in investing in new and untested technology.

It is essential that a robust policy framework is put in place for any further development of onshore wind energy in Caithness and Sutherland, including issues such as landscape capacity, cumulative limit and protection of wild land character.

Questioning need to cover this strategic issue within CaSPlan, it should be dealt with via the Highland wide Local Development Plan, with a common approach across the Highland area.

Local construction aggregate supply is not addressed.

Interim position agreed by Area Committee:

The Council is committed to a Carbon CLEVER approach. It is recommended that the Proposed Plan relies on policies within the Highland wide Local Development to help deliver this approach. Whilst it is recognised that many people would like to see fewer windfarms being built, the Council has a responsibility to produce a policy framework for assessing any further development of onshore wind energy. Draft Supplementary Guidance on Onshore Wind Energy will be available for public consultation later in 2015.

The additions and amendments suggested will be considered. The Carbon CLEVER approach will need to be a theme which stretches across the plan.

The Scotland Heat Map will be taken account of in the preparation of the Proposed Plan. **Recommended Proposed Plan content:**

Recommended Proposed Plan coment:

As per interim position outlined above, subject to the following:

The general support for the preferred approach to planning for a low carbon Caithness and Sutherland is noted. The Council is committed to a Carbon CLEVER approach and the policies in the Highland wide Local Development will help deliver this approach.

The general support from some respondents for onshore wind development and tidal development is noted. It is also acknowledged that a large number of respondents do not wish to see more onshore windfarm developments for a variety of reasons. The emphasis is not solely on windfarms. Policy 67 Renewable Energy Developments of the Highland wide Local Development Plan, applies to all forms of renewable energy.

The Council has a responsibility to produce a policy framework for assessing any further

development of onshore wind energy. The Draft Supplementary Guidance on Onshore Wind Energy is out for public consultation from 25 September 2015 until 18 December 2015. It covers topics such as landscape, cumulative impact and wild land areas and reflects recent updates to national policy.

The Strategic Environmental Assessment (SEA) of the plan includes site assessments and the climate change section of the site assessment looks at potential impact from flooding and coastal erosion. One of the SEA Objectives is to reduce greenhouse gases and contribute to the adaptation of the area to climate change. The vision, outcomes and policies of CaSPlan have been assessed against the potential impact on this.

Timings of public transport are out with the remit of planning and ultimately are the responsibility of the public transport companies. However it is noted that this could make a big difference to the number of people using public transport. The Plan is encouraging the concentration of development in main centres which helps tie development into existing or planned transport. The Green Transport Strategy outlines the Council's aims and policies for growth in sustainable transport which will contribute to the Governments' emission targets by providing alternatives to existing motorised single occupancy car trips. It examines the potential schemes and infrastructure requirements to achieve the aims contained within the strategy. The main principles and aims for achieving an efficient and sustainable transport network are set out in the Council's Local Transport Strategy. The Green Transport Strategy aims to complement this.

Scottish Planning Policy sets out that all local development plans should support the development of heat networks in as many locations as possible. Renewable heat has the potential to make a substantial contribution to the reduction of carbon emissions in Highland, and will be crucial in achieving the goals of the Carbon CLEVER initiative. This is a relatively new policy area and is being considered as part of the current review of the Highland wide Local Development Plan. The Proposed Plan will mention the importance of alternative fuels and heating options and it is noted that there is risk involved in investing in new and untested technology. The Proposed Plan will also refer to the Scotland Heat Map which provides information on heat demand and supply opportunities and we will work with developers to identify potential for low or zero carbon heating and district heating schemes.

Encouraging a wood fuel industry within Sutherland rather than timber being transported out of the area is a good idea and the plan does not discourage this.

Building Standards require all new buildings to meet certain sustainability targets. This is outwith the control of the planning system.

National policy is for no new nuclear energy facilities. Therefore Highland Council will not be promoting nuclear energy.

Solid waste disposal and how it will be managed, local construction aggregate, disturbance to peatlands from development and woodlands and trees are being dealt with via the review of the Highland wide Local Development Plan.

Issue 3: Strong & Diverse Economy

MIR Issue	Strong & Diverse Eco	onomy	
MIR reference:	Question 3		
List of respondents (inc	cluding customer nur	nber):	
Akke Parkin (4933) Alexander Thomson (472 Alison Kirk (4711) Allan Tubb (5122) Altnaharra Estate Ltd. (48 Amanda Robertson (4899 Amelia Walker (4798) Andrew Gunn (3621) Assynt Tourism Group (4 Ben MacGregor (4697) Bill Badger (5021) Brian Johnston (2073) Caithness Chamber of Co Caithness Horizons (2014 Campbell Cooper (4686) Carol Paterson (3304) Catherine Stewart (5095) CH Architecture (4742) Claire Cairns (5096) Colin Moore (5092) Colin Paterson (2032) Culgower House B&B (50 Diana Johnston (4937) DP Marine Energy (5086 Durness Development Ga Elizabeth Mackay (5094) Fran Simmons (5130) G. C. Walker (3655) Gayle Rennie (3603) Golspie High School Pare Ian Walker (3658) Infinergy (5108) Jan Thomson-Fraser (47 Jerry Bishop (3665) Jill Falconer (3666) Joan Bishop (4896) John Barkham (4898) John Cormack (2106)	579) 938) ommerce (5119) 4) 082)) roup Ltd. (3618) ent Council (4723)	John Ferguson (4698) John Inkster (4696) John Swanson (5116) Les Mason (4770) Liz Wassall (4839) Lyndall Leet (3672) Marion Turner (2276) Martin Bridge (4724) Martin Sutherland (4844) Melanie Spirit (4837) Ngaire Mingham (5097) Pierre Bale (4683) Rhys Reid (5066) Robert Falconer (4948) Roy Lambert (4681) Scott Coghill (4685) Scott McLean (4931) Scottish Natural Heritage (2 Scottish Natural Heritage (2 Scottish Southern Electric F Scottish Water (396) Sharon Lennie (4745) Simon Stevens (4676) SportScotland (2087) Stuart Andrew (4840) Terry & Jane Clarke (3380) The Crown Estate (4836) The Mountaineering Counc The Scottish Government (The Theatres Trust (5070) Thurso Bay Trading Co. Lto Ulbster Arms Ltd. and Rive Wildland Ltd. (5114) William Marshall (3629) William Stewart (5090) William Walker (5076) Zelda Chaikin Linekar (470	PLC (5109) il of Scotland (4687) 4616) d. (2016) r Thurso Ltd. (184)

Summary of the comments received:

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to delivering employment (168 respondents):

21% strongly agreed
42% agreed
20% were neutral
9% disagreed
2% strongly disagreed, and
5% didn't know

Employment

Suggestions made that CaSPlan should also indicate the need to focus not only on Renewables and Tourism but also other sectors: Oil; Fishing; Knowledge; Timber; Creative Industries and Information Technology.

A number of respondents state that the tourism industry can be an important growth sector in the area.

Arguments both for and against being flexible about employment-generating use types within Business Parks, etc.

Several respondents stated that businesses should be encouraged to develop on brownfield sites rather than allocating more greenfield land for development.

Suggested that a need to be able to respond faster and more flexibly to economic development needs.

Suggested that the Plan should provide clarity of policy for rural economic development.

A number of factors were suggested which could assist economic growth and jobs prospects: improved transport links; long term jobs not short term contracts; a major Government project to replace Dounreay e.g. a new nuclear power station; Community Benefit funds used to increase employment opportunities; more support for small industries; not focussing solely on one industry; processing produce locally; enticing development; consideration not only of the number of jobs but also of their value; calling for local jobs in large developments; using IT and communications technology to facilitate local employment development in Growing Communities; consideration of the impacts of the Council's own employment decisions, especially on small and fragile communities; attracting teachers, surgeons, hospital staff and other professionals the others will follow.

Marine Renewables generally supported more than Onshore Wind, but concerns that may be relied upon more than it can deliver in terms of jobs; reference should be made to benefits of a collaborative approach with Orkney Islands Council; uncertainties indicate need for a flexible approach to the sector, but need for clarity in the approach to marine renewables related proposals on non-allocated land and some are against this approach. Many respondents expressed concern about the speed at which the marine renewables industry is progressing.

Arguments both for and against restricting employment developments to allocated sites. The Crown Estate highlight that the Plan should recognise that onshore facilities for the marine renewables sector is uncertain and a flexible approach is required.

Reference should be made to the 'Flow to the Future Project', the 'Dornoch Economic Masterplan' and to University of the Highlands and Islands opportunities.

Some comment that parts of the John O'Groats Masterplan are going well whilst some parts are less so.

Recognise the role of town centres in supporting a diverse economy, and the role as hubs for a range of activities.

Locational benefits of the area can support renewables sector and should be capitalised upon through an appropriate supporting policy framework for renewables.

Several respondents stated that the priority should be on job creation over other issues.

Interim position agreed by Area Committee:

The CaSPIan MIR focused on supporting greater diversification of the economy. It recognised that the economy of Caithness and North Sutherland had been driven largely by Dounreay and other industries such as tourism and renewable energy were important for generating new employment opportunities. From the response to the consultation there was strong agreement (62% of respondents 'agree' or 'strongly agree') with this approach. However some important points were raised in terms of other employment sectors which should be promoted and supported such as forestry and IT.

We recommend that the strategy continues to focus on renewable energy and tourism but place greater acknowledgement of the contribution of other existing and growing sectors.

Due to the uncertainty regarding the future onshore requirements for the marine renewables sector it is recommended that some level of flexibility is maintained to consider employment related proposals which are not on allocations in the Plan.

Recommended Council Response:

As per interim position outlined above, with the following additional comments:

Employment Outcome

- The suggestions for additional industries to be added to those shown in the Outcome are noted. The reference in the Proposed Plan to 'land management and sea based industries' covers timber and fishing and support for creative industries is reflected in a 'tourism industry that combines culture, history and adventure'. The technology sector is considered to be incorporated within 'engineering'.
- Business and industrial land will be protected from redevelopment or change of use to other land uses, particularly those which do not generate employment opportunities.
- Points raised about the need for a flexible approach to the economy are noted. This is, and will continue to be, a main aim of the Plan. The offshore renewables sector is widely considered as a key growth sector but the exact requirements for onshore development is not fully known. Therefore to ensure that the Plan does not constrain the sector a level of flexibility is needed. This is reflected in Policy 41 within the HwLDP which allows for non-allocated sites to be supported for emerging industries.
- The lack of policy clarity over rural economic development will be addressed through the review of the HwLDP. It is proposed within the HwLDP MIR that a new policy is introduced called Rural Economic Development which seeks to provide greater support for employment generating development in remote and fragile areas whilst also protecting the environmental quality. The revised CaSPIan strategy reflects this emerging HwLDP position.
- The Plan already outlines opportunities which arise from improving the internet connections and this is supported through the Plan strategy. Reference has also been made to opportunities for home-working, live-work units, micro businesses and community hubs.
- The Plan already aims to reduce the pressure on greenfield sites by directing development towards brownfield land. However, the additional costs and constraints of redeveloping brownfield land is recognised and therefore allocating some greenfield land is needed.
- The points raised which could assist economic growth and job prospects are noted. The Plan is supportive of a diverse economy but there is a particular focus on the offshore renewables sector and the tourism industry. The focus is needed to overcome any constraints and make Caithness and Sutherland an attractive place to invest. The reference to Community Benefit is not relevant to CaSPlan as it is prepared as a separate

stand alone policy document.

- As mentioned above, the Plan places a particular focus on growing the offshore renewables sector. It is recognised that there are many other economic opportunities across the Plan area but the offshore renewables industry could deliver significant levels of jobs and inward investment. As a result the Council and other stakeholders need to work together to address constraints and make the area an attractive place to invest in. For example, certain aspects of the North Highland Onshore Vision will be included within the CaSPlan Action Programme.
- The Plan already identifies the important role which town centres play and the pressures which they have been under in recent decades. A revised version of the Town Centre First policy is included within the Proposed Plan and supporting text addresses the points raised by Scottish Government in their response to the CaSPlan MIR. This reflects the preferred approach set out within the MIR of the HwLDP.
- The Council is committed to growing the renewables sector and its planning policy framework is based on the general policies within the HwLDP and the Onshore Wind Energy Supplementary Guidance. Both of these documents are currently under review. Based on the revised SPP the Development Plan will provide a new and updated spatial framework.
- CaSPIan will reflect the aims and objectives of the Council and its partner organisations in prioritising job creation and economic growth whilst also protecting and enhancing the environment.

Issue 4: Strengthening & Supporting Communities

MIR reference:Question 4List of respondents (including customer number):Akke Parkin (4933)Alexander Thomson (4729)Alison Kirk (4711)Allan Tubb (5122)Amelia Walker (4798)Andrew Gunn (3621)Assynt Tourism Group (4938)Bill Badger (5021)	Strengthening & Supporting Communities		
Akke Parkin (4933)John CormaAlexander Thomson (4729)John FergurAlison Kirk (4711)Laid GrazinAllan Tubb (5122)Lisa PoulseAmelia Walker (4798)Liz RollingsAndrew Gunn (3621)Liz WassallAssynt Tourism Group (4938)Lyndall Lee			
Alexander Thomson (4729)John FergusAlison Kirk (4711)Laid GrazinAllan Tubb (5122)Lisa PoulseAmelia Walker (4798)Liz RollingsAndrew Gunn (3621)Liz WassallAssynt Tourism Group (4938)Lyndall Lee			
Brian Johnston (2073)Martin SuthCaithness Chamber of Commerce (5119)Melanie SpiCaithness Horizons (2014)NDA PropeCampbell Cooper (4686)Network RaCatherine Stewart (5095)Pierre BaleCH Architecture (4742)Rosemary MColin Moore (5092)S. Blance ADavid Walker (4845)Scott CoghiDiana Johnston (4937)Scottish WaDurness Community Council (348)SportScotlaDurness Development Group Ltd. (3618)Stephen FoG. C. Walker (3655)Terry & JanGary Parker (4739)The CrownGayle Rennie (3603)The ScottishGeorge Mitchell (4688)The Theatre	son (4698) gs & Community Committee (5023) n (4773) (4682) (4839) t (3672) her (2276) erland (4844) rit (4837) rties Ltd. (5128) il (4974) (4683) MacRae (4693) ssociates Ltd. (4976) Il (4685) tter (396) nd (2087) ster (3678) e Clarke (3380) Estate (4836) n Government (4616) es Trust (5070) Trading Co. Ltd. (2016) wart (5090)		

Of those respondents that indicated their opinion to the multiple choice options on the preferred approach to delivering growing communities and promoting and protecting settlement centres (162 respondents):

11% strongly agreed45% agreed28% were neutral5% disagreed2% strongly disagreed, and9% didn't know

General

One size does not fit all – Caithness and Sutherland differ, with a diverse array of communities. Churches should be allowed/encouraged to access funding resources for repairs, maintenance and extensions – they play an active community role/contribution/use and would provide jobs for locals.

Little evidence of communities losing population – traffic is increasing and housing prices rising.

Growth is unlikely after Dounreay ceases.

Lack of demand for houses - enough land already allocated.

Don't build on green belts but use outlaying areas.

It is difficult to have rigid planning and have flexibility for those who wish to develop their own sites outwith land-banked areas.

Growing Communities Outcome

Generally much support for the principles of strengthening growing communities and promoting growth within existing communities.

Growing Communities need: work, transport links, public transport (e.g. Kyle of Sutherland to Dornoch), affordable and sustainable transport, schools, welfare, NHS, 24hr A+E, facilities for all ages, investment.

Need sensitivity in order to preserve north highlands, and do not forget the west coast.

Settlement Centres

In favour of re-use of vacant and derelict properties around centres (e.g. Thurso).

Protecting settlement centres will provide difficult balancing with economic arguments.

Town centre shops face great competition from online shopping and home delivery – if cannot compete, will not attract footfall.

Focus should be expanded to cover smaller settlements.

The MIR says it wants to develop town centres yet identifies development land outwith the town centre, which is contradictory.

Agree with promotion and protection of settlement centres, sequential approach and preference for brownfield first.

Preserve existing assets.

Landowner's proposals for new hotel/leisure in Thurso would help the town.

Re-use and redevelopment is welcomed, providing it retains character of the locality.

SPP requires preparation of a town centre health check, a strategy to deliver improvements and inclusion of spatial elements of town centre strategies in the development plan (LDP or SG).

If the identification of community projects and recycling of disused buildings can be tailored to help, that would be great. Resist idea of too much centralisation.

Lady Ross and adjacent site in centre of Ardgay needs planned regeneration, with preparation of a Council-led development brief.

Developments must be thoroughly planned and costed – implementation must be right and consideration given to existing housing and businesses.

Proposed Policy – Promoting and Protecting Settlement Centres

Support for preferred option as it will sustain the development of public transport infrastructure.

The Council could consider supplementing the suggested policy with reference to encouraging a mix of uses, throughout the day and into the evening.

Some concerns about the proposal to encourage conversion of redundant retail space to residential and community use, as outright conversion (particularly to residential) is likely to impact on potential future business growth. Therefore would prefer an amended version that has conversion to residential use only considered as a last resort.

Town Centre Living is one of the strands of the national Town Centres Action Plan and the Proposed Plan should support this theme.

The policy should also include the protection and enhancement of important community facilities. A supermarket on the edge of Golspie would be damaging.

Agree that properties could be re-used for housing and this should be encouraged.

Services

A9 improvements are needed – and improvements should be maximised at every opportunity. The assumption that if you provide the facilities they will be used is sadly flawed as evidenced by those settlements that have good facilities but which are underused.

Need professionals (teachers, hospital staff, etc) to come to the area first, to improve it, then others may be enticed north; keep hospitals open and improve the college.

Need employment for existing residents.

Interim position agreed by Area Committee:

There is general support for the preferred approach to delivering the growing communities outcome. The principles of strengthening growing communities and promoting growth within existing communities will be carried forward into the Proposed Plan.

The policy on Promoting and Protecting Settlement Centres will be carried forward into the Proposed Plan with some potential minor modifications. The modified policy will take into account comments received. There was general support for the re-use of vacant and derelict buildings. There was some suggestion that the focus for the policy should be expanded to cover smaller settlements. There was some concern raised about the potential impact of converting redundant retail space to residential and community use as it could impact on future business growth. No suggestions were made for settlement centre boundaries for Brora, Dornoch or Golspie.

Recommended Proposed Plan content:

As per interim position outlined above, subject to the following:

General

It is acknowledged that there are wide variations between settlements across Caithness and Sutherland and this has been taken account of when deciding on the hierarchy of policy approach to how development proposals will be assessed. This approach should also add certainty for communities and developers on allocated sites, but also allow greater flexibility for places where a rigid approach may not help with sustaining communities. The policy approach is trying to promote a pattern of development that is appropriate for each area and the challenges faced by areas. It is important that a variety of land is allocated for development, including housing. This provides flexibility and choice and enables the market to respond to demand. There is also a long term trend of an ageing population, so extra housing will be required. There are no statutory green belts in Highland.

Growing Communities Outcome

The overall support for the growing communities outcome is acknowledged. It is recognised that communities need wide ranging facilities, however not everywhere has all of these facilities. This

outcome is trying to create the best chance of communities getting investment and having facilities and also helping communities retain existing facilities.

Settlement Centres

As part of the review of the HwLDP, the policy has been renamed to Town Centre First. It is proposed that this new version of the policy is included in CaSPlan. The overall purpose and thrust of the policy remains the same but many of the details have been strengthened. The policy is not intended to divert essential services and developments away from smaller settlements. Caithness and Sutherland contain a network of different sized settlements which all play their own roles in sustaining communities.

Encouraging development in the town centres and also allocating land outwith town centres is not contradictory. The Proposed Plan is encouraging uses that create footfall to locate within town centres and where appropriate for upper stories of buildings in town centres to be used for residential purposes. Land also needs to be allocated for development outwith town centres, as there would not be enough land within town centres for all types of development.

There have been no formal town centre health checks carried out in Caithness and Sutherland over recent years, however other work has taken place. Charrettes were carried out in Wick and Thurso in February 2013. One of the outcomes from Wick was a desire to have regeneration in the heart of the town and in Thurso one of the outcomes was the desire to reinforce the town centre. The Dornoch Economic Masterplan examined the key challenges to Dornoch's town centre and how these challenges could be addressed. The review of the Highland-wide Local Development Plan is trying to address all the requirements of SPP.

When deciding what sites to allocate in the Proposed Plan, sites are assessed but they are not costed. Generally a definite proposal is not identified for a site when it is being allocated. The allocation provides a level of certainty to developers and it is only at project stage that a developer would cost up a development to see if it was economically viable.

Proposed Policy – Promoting and Protecting Settlement Centres

The policy in the Proposed Plan will refer to town centre boundaries and it encourages residential use when it is appropriate to do so and sets out what the Council will expect. By encouraging appropriate residential conversion, it is ensuring that settlement centres remain vibrant during the day and the evening. The policy sets out that for a redundant retail space to be converted to residential use, it must be demonstrated that the property has been marketed for its existing use at a reasonable price/rent without success for a minimum period of 12 months. Town centre boundaries are identified for Brora, Dornoch, Golspie, Thurso and Wick.

The policy does not specifically protect and enhance important community facilities, but it is ensuring that they are located in the most appropriate places, where local communities can access them.

Services

CaSPlan is aligned with the Highland Local Transport Strategy and supports projects that are to be delivered by partner agencies.

Issue 5: Getting around & Staying connected

MIR Issue	Getting around & Staying connected			
MIR reference:	Question 5			
List of respondents (including customer number):				
List of respondents (including customer Akke Parkin (4933) Alexander Thomson (4729) Alison Kirk (4711) Allan Tubb (5122) Altnaharra Estate Ltd. (4579) Amelia Walker (4798) Angus Mackay (5081) Ben MacGregor (4697) Bill Badger (5021) Bill Mowat (1365) Brian Johnston (2073) Caithness Chamber of Commerce (5119) Caithness Horizons (2014) Catherine Stewart (5095) CH Architecture (4742) Colin Moore (5092) Culgower House B&B (5082) Donald Robson (5078) Durness Community Council (348) Durness Development Group Ltd. (3618) G. C. Walker (3655) Gail Brown (5129) Gary Parker (4739) Gayle Rennie (3603) George Mitchell (4688) Gill Arrowsmith (4934) Golspie High School Parent Council (4723) Ian Walker (3658) Jan Thomson-Fraser (4712)		Jerry Bishop (3665) Joan Bishop (4896) John Barkham (4898) John Cormack (2106) John Ferguson (4698) Kenneth Nicol (4944) Laid Grazings & Community Co Les Mason (4770) Marion Turner (2276) Martin Sutherland (4844) Melanie Spirit (4837) NDA Properties Ltd. (5128) Network Rail (4974) Ngaire Mingham (5097) Pierre Bale (4683) Robert Falconer (4948) Robert Wylie (4684) Roy Lambert (4681) Russell Smith (4930) Scottish Natural Heritage (204) Scottish Water (396) Simon Stevens (4676) SportScotland (2087) Terry & Jane Clarke (3380) The Crown Estate (4836) The Scottish Government (4610) The Theatres Trust (5070) Tina Irving (3617) Victoria Mackay (5123) William Stewart (5090) William Walker (5076)		

Summary of the comments received:

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to getting around and staying connected (161 respondents):

19% strongly agreed
46% agreed
24% were neutral
3% disagreed
3% strongly disagreed, and
6% didn't know

General

Several respondents suggested that Scottish Government be lobbied by the Council for road, rail and communications infrastructure improvements.

Limitations to rural transport were raised by several respondents as key issues, including the CaSPlan strategy map appearing to focus transport to the east coast. Several respondents noted the limitation to transport and connectivity of the NW coast of Sutherland.

Strategic transport links and the condition and maintenance of existing roads were raised as issues, particularly in relation to minimising journey times and ensuring safe travel routes.

A range of specific road, rail, active travel and communications infrastructure improvements were suggested (e.g. North Highland Way; A9 safety in settlements; need for improved mobile phone network coverage; Georgemas Rail Station).

Concerns were raised about the future of rural and dispersed communities, with a strategy focused on focusing development to larger settlements, citing the importance of maintaining connectivity for smaller communities.

Several other recommendations were made including: identifying developer requirements, using the Scottish Government's Good Practice Guide and planning circulars 6/2013 and 3/2012; recognising strategic stopping points for bus tours in Caithness; assessing impacts of new site allocations on increased use of level crossings; further information should be gathered on the use of different transport modes to identify future strategies, and using the *Connect Europe Facility* for integrated planning of infrastructure.

Internet

A large number of respondents supported the roll out of high speed broadband in the Plan area.

Several respondents highlighted that other forms of connectivity (private and public transport) are needed to support growth resulting from broadband investment, e.g. tourism.

Public Transport & Active Travel

A large number of respondents highlighted the need for improved public transport in the area, suggesting that the existing services linked to the high dependency on private transport.

A number of respondents agreed that there were opportunities for active travel in the area, but highlighted that there were many areas and opportunities for improvement.

There was general support for the improvement and increase in number of active travel routes including paths and cycle routes and tracks, and support for the plan identifying aspirational path routes.

It was suggested that the multi-functioning role of green networks be used to help facilitate new active travel routes in the Plan, and that developer contributions could be used to realise these routes.

Several respondents cited *Transport for Tongue* as a good example of community-led public transport.

Interim position agreed by Area Committee:

Issue 5 of the MIR recognises that *we cannot directly deliver improved infrastructure and transport connections* because these are not functions of the Local Development Plan, however, by directing growth to the right places the Plan can focus growth to support improvements. A number of respondents referred to strategic transport issues and some call for improvements. The Strategic Transport Projects Review was published in 2008 and sets out the Scottish Government's investment priorities to 2032. It is proposed to include a clear update on the latest position on delivering improvements to the A9 and other strategic infrastructure, actions for which will be set our in the Draft Action Plan accompanying the Proposed Plan.

The strategy to focus growth to larger settlements is intended to ensure communities are supported, and their services are sustainable and accessible. It is recommended that the CaSPlan approach to managing growth through Growing Settlements and Settlement Development Areas be noted as the best means for supporting communities, and that comments on this issue be noted in carrying forward the approach into the Proposed Plan. Officers will take note of all relevant guidance and Planning Circulars when considering developer requirements in the preparation of the Proposed Plan, and that green networks are used to help identify Active Travel opportunities for settlements.

Recommended Council position:

As per interim position outlined above, subject to the following:

A range of details on specific infrastructure projects are now embedded within the Plan and, where relevant, in the Action Programme:

- Plan alignment with the Highland Local Transport Strategy;
- Supporting Transport Scotland's Berriedale Braes A9 improvements;
- Supporting Scottish Government's NPF3 national development of a Digital Fibre Network;
- Setting clear Developer Requirements for infrastructure for sites;
- · Promoting active travel and green network enhancements in sites and settlements, and
- Directing growth to locations easily linked to, and that will help attract investment for, existing infrastructure.

Issues 6a & b: Ensuring high quality places are delivered and Special Landscape Areas

MIR Issues	Ensuring high quality places are delivered and Special Landscape Areas			
MIR reference:	Questions 6a & 6b			
List of respondents (including customer number):				
Akke Parkin (4933) Alexander Thomson (47 Alison Kirk (4711) Allan Tubb (5122) Altnaharra Estate Ltd. (4 Assynt Tourism Group (Ben MacGregor (4697) Bill Badger (5021) Bill Mowat (1365) Brian Johnston (2073) Caithness Biodiversity (7 Caithness Horizons (207 Campbell Cooper (4686) Catherine Stewart (5095) CH Architecture (4742) Culgower House B&B (5 David Doohan (3650) Donald Robson (5078) Durness Community Co G. C. Walker (3655) Gayle Rennie (3603) George Campbell (239) George Mitchell (4688) Infinergy (5108) Jan Thomson-Fraser (47 Jerry Bishop (3665) Joan Bishop (4896) John Barkham (4898)	4938) Group (4726) 14)) 5082) uncil (348)	John Inkster (4696) Kathleen Cunningham (4699) Kenneth Nicol (4944) Laid Grazings & Community (Les Mason (4770) Liz Rollings (4682) Liz Wassall (4839) Lyndall Leet (3672) Martin Sutherland (4844) Melanie Spirit (4837) NDA Properties Ltd. (5128) Ngaire Mingham (5097) Reay Clarke (4929) Robert Falconer (4948) Rosemary MacRae (4693) Roy Lambert (4681) Scott Coghill (4685) Scottish Natural Heritage (204 Scottish Natural Heritage (204 Scottish Southern Electric PL Scottish Water (396) SportScotland (2087) Stephen Foster (3678) Terry & Jane Clarke (3380) The Crown Estate (4836) The Scottish Government (46 The Theatres Trust (5070) Thurso Bay Trading Co. Ltd. (Victoria Mackay (5123)	Committee (5023) 4) C (5109)	
John Cormack (2106) John Ferguson (4698)		William Stewart (5090)		
Summary of the comments received:				
Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to delivering high quality places (Issue 6a) (158 respondents):				

24% strongly agreed42% agreed21% were neutral2% disagreed4% strongly disagreed, and7% didn't know

Of those respondents that indicated their opinion to the multiple choice options on the suggested approach to Special Landscape Areas (Issue 6b) (161 respondents):

19% strongly agreed 33% agreed

29% were neutral 2% disagreed 5% strongly disagreed, and 12% didn't know

General

Suggestion that the Plan needs to identify green networks for principal larger settlements, and possibly green corridors outwith those, and to manage access for visitors, providing a path network and other facilities across the area to link Special Landscape Areas.

Conservation Areas

There were suggestions that CaSPlan should enable review of conservation areas including conservation area character appraisals, and ensure that important areas are conserved.

Design

Comments were raised about ensuring policies present a creative and flexible design statement to ensure high quality design, create high quality places on high quality sites, and ensure places are not created that price local people out of the market.

Special Landscape Areas & Natural Heritage Issues

There was general support for the SLA preferred amendments, but some concerns were expressed about SLA policy: some suggested the policy needs to better protect SLAs, whilst others raised concerns about further restriction on development particularly outwith the SLAs, and comment was also made about the need to have a clear definition of what an SLA is.

A number of additional areas were suggested for new or extended Special Landscape Areas: Erriboll (extend to include west side); Farr Bay (extend to include whole); Thurso Bay and/or Pennyland; Stroma and East Caithness Coast; all of Caithness and Sutherland Coast, Duncansbay Head

Some concerns were expressed about the preferred option for extending SLA at Dunnet Head, if restricts ability to land cables at that point.

It was suggested that whilst SLAs should be safeguarded, access to them by the public and tourists should be encouraged to celebrate their qualities. It was also suggested that the Plan recognises the important landscape designations in the area (e.g. Kyle of Tongue NSA); safeguards geological and archaeological sites; and recognises the role of Local Biodiversity Action Plans.

Prioritising the carbon sink role of Peatlands, safeguarding freshwater lochs from impacts of development and a clear Wild Land policy were also highlighted as key factors.

Other Issues

consider a strategy to address the 'temporary' nature of many existing buildings at John O' Groats Concerns were expressed about: preserving a place in aspic which could stifle growth; the impacts of onshore wind energy developments; the allocation of sensitive sites for development. Suggestion for removing open space from settlements and instead creating larger plot sizes between houses.

Interim Position Agreed by Area Committee:

Work is ongoing to identify green networks for larger settlements and strategic level, and core path plans currently exist that seek to ensure key routes are available for public to access. It is recommended that these factors are noted for moving forward into the Proposed Plan.

Conservation Area reviews and associated works are managed and supported through policy in the upcoming review of HwLDP. High quality design underpins the preferred CaSPlan approach identified in the MIR and features in Placemaking Priorities for Settlements, with the preferred strategy for housing supporting a mix of tenure.

The review of Special Landscape Areas focuses on relatively minor adjustments to ensure that
original lower-resolution mapping was updated by area LDPs to ensure SLAs enclosed areas of similar landscape and/or to ensure that the boundary did not inadvertently sever a landscape boundary. We will review all suggestions for SLA boundary amendments. The review was not to identify new SLAs or remove existing ones. The original methodology used to identify SLAs was challenged through the HwLDP Examination and the Reporter supported the current SLAs, subject to the minor adjustments mentioned above. It would be a significant and unnecessary piece of work to review and re-evaluate SLAs across Highland, given that we are confident in the existing SLAs, and HwLDP Examination conclusions on the issue. Therefore it is recommended that no new SLAs be considered for the Proposed Plan.

The range of other national designations and important features mentioned, onshore wind energy development, and sensitive settings are all afforded significant policy protection through the HwLDP, it is recommended that these factors are noted for moving forward into the Proposed Plan.

John O'Groats is a Growing Settlement and specific issues will be addressed through the Placemaking Priorities in the Proposed Plan.

Open Space is supported through SPP and HwLDP and it is recommended that we identify and safeguard Open Space in CaSPIan.

Recommended Council Response:

As per the Interim Position outlined above, subject to the following:

Green network opportunities are identified on the Strategy Map and at a settlement level, and where relevant are highlighted on settlement maps and in developer requirements for sites. This provides clarity to Plan users and emphasises the multi-functional role and importance of green networks.

Express reference to the potential for conservation area reviews and management plans are given in the Environment and Heritage section to provide clarity about the Council's intentions for future management of Conservation Areas and to enable management plans to be adopted as Supplementary Guidance.

A minerals audit will be undertaken to inform the HwLDP and therefore does not feature in this Plan.

Issue 7: Ardgay

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future?		
MIR reference:	Question 7: Ardgay		
List of respondents (in	cluding customer nu	mber):	
Andy Grieg (5242) Ardgay and District Community Council (326) Ardgay Stores and Highland Café (5243) CH Architecture (4742) David Catto (3649) Gregor Macleod (5246) Marion Turner (2276)		Mike & Tracy Dowling (5204 Rosemary MacRae (4693) Scottish Environment Protect Simon Venters (5244) SNH (204) Strutt and Parker on behalf (5115)	ction Agency (3115)
Summary of the comm	ents received:		
General Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)			
The centre of Ardgay is in need of attention. (4742)			
Ardgay is on the A836 and the plan should state that it has a railway station with a commuter train service to Inverness and is on National Cycle Route 1. (2276, 326)			
Remove reference to discouraging piecemeal development between Lower Gledfield and Ardgay. (2276, 326)			
Not enough land has been identified for growth; one housing site is identified yet there is a commuter rail link to Easter Ross and Inverness. If more housing land is made available it may encourage more people to live in Ardgay and commute. This would then improve the viability of the rail link, local services including broadband and transport links, in turn strengthening the community. (2276)			
Supports the identification of Ardgay as a settlement. (5115)			
The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)			
Need to integrate transport so buses and trains are timed to meet each other. Lack of disabled access onto trains. Dangerous access to/from the station. (326)			
No safe route to school as no crossing or patrol for children (326)			
Improve pavements and create pedestrian links through the village. (326)			
Highlight and improve the pedestrian/cycle link between Ardgay and Bonar Bridge, especially in light of the new Youth Group facility at South Bonar Industrial Estate. (326)			
Long term empty school house is an issue. (326)			

Placemaking Priorities

Remove "Focus housing development beside the school", as it is too restrictive. (2276)

Add: Village centre regeneration; additional tourist facilities; Assist and promote economic development; Identify a range of sites for housing; Identify sites for business/industry; Iack of public parking (2276, 326)

Add: Avoid any adverse effect on Dornoch Firth and Morrich More SAC (including otter). (204)

AG01 Adjacent to Primary School and north of Church Street

Ridiculous that a greenfield site is being proposed when there is a suitable brownfield site located in the centre of the village (Lady Ross site). (4693)

Developing beside the school would have significant traffic impacts on an already narrow and busy road. (4693)

The rational for AG01 makes no sense as housing beside the school will require virtually no active travel for school pupils but will result in many car journeys to the village. (2276)

The area immediately beside the school boundary wall should be taken into Council ownership. A road access should be formed at the bend in Church Street where visibility is good. The area of land beside the school boundary should be made into car parking, a gate through the boundary wall would allow passage to and from this car park without recourse to the road. The current car parking layby in Church Street should be turned into a hard surface play area. This new carpark could be used by parents and staff. (326)

AG02 Ardgay Railway Station Yard North

Would be equally good as a housing site. (4742) This site should not be included. It has been suggested for years and Network Rail has always said no as the area is required for railway purposes. (326)

AG03 Ardgay Railway Station Yard South

Would be equally good as a housing site. (4742)

Part of the site may be at risk of flooding from a watercourse. Need to include a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. Mitigation measures proposed in the Environmental Report to protect the watercourse should be included in the Proposed Plan. (3115) This land has been used for business activity for some time therefore there is no reason to continue this as an allocation. (326)

Lady Ross Site

Site has the infrastructure and space to support development. (4693)

This should be highlighted as a potential development area. (4742, 326)

This should be included as a site for mixed use for housing, tourism, open space, business, access, community. (2276, 326)

Site Behind Ardgay Public Hall

This should be included as a site for mixed use for tourism, open space, business, access and community. (326)

ADDITONAL SITES

Lady Ross Site

Concerned about the condition the building is in. Tiles have been removed from the stone barn and it is likely that bats use the building. The centre of Ardgay would benefit from a tourist information centre and perhaps facilities for local people to promote their produce and services. There is already ample housing stock in the area. (5204)

Concerned about the condition the building is in and there appears to be no plan for its future. Would welcome redevelopment of the site for housing. (5242)

Site should be used for affordable housing/flats and a self catering hostel to help encourage tourists back to the area. (5243)

The building is an eyesore and should be flattened and replaced with a new tourist shop and parking. (3649)

Building is an eyesore and should be removed. Use for either housing, flats or a caravan/tenting site. (5246)

Site Behind Ardgay Public Hall

There is already ample housing stock in the area. (5204)

Land should be given to the hall to help with the parking issues. (5243)

Would be best used for parking. The Council maintains it but the picnic area is never used. (3649)

Land should be used for parking. (5244)

Land should be made into a hard standing for car parking. (5246)

Interim position agreed by Area Committee:

The strategy for Ardgay focused on carrying forward the sites from the Sutherland Local Plan, which provided for housing and business uses and it is recommended that sites AG01, AG02 and AG03 are carried forward into the Proposed Plan. Through the MIR consultation it was clear that the community felt that the regeneration of the centre of Ardgay should be highlighted as a placemaking priority which would in turn assist and promote economic development. Further to this two additional sites were proposed: land behind Ardgay Public Hall and the Lady Ross Site. These were consulted on through the Additional Sites Consultation. It is recommended that the Lady Ross site is taken forward as an allocation into the Proposed Plan and that the placemaking priorities highlight the importance of regenerating the centre of the settlement. During the additional sites consultation there was a general consensus that the Land Behind Ardgay Public Hall would be best used for car parking.

Recommended Council response:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

It is agreed that the centre of the village would benefit from regeneration. The placemaking priorities will reflect this.

The text in the Main Issues Report was erroneous stating that Ardgay sat on the A867; the Proposed Plan will correctly state that it sits on the A836. The Proposed Plan can provide further background information on the settlement such as it is on National Cycle Route 1 and there is a

commuter train service to Inverness.

The reference to "discouraging piecemeal development between Lower Gledfield and Ardgay" was text that was carried over from the adopted Sutherland Local Plan. It is recommended that this reference is carried forward into the Proposed Plan. The intention behind this is to prevent a gradual, unplanned coalescence between the two areas. There is potential in the future for planned longer term growth.

During the Call for Sites exercise in Autumn 2013, no additional sites were suggested so the allocations in the Sutherland Local Plan were carried forward into the Main Issues Report as they were felt to be sufficient for Ardgay. It has been suggested that allocating additional housing land may encourage more people to live in Ardgay and use the commuter rail service to Easter Ross and Inverness. Having a more generous amount of allocations could aid this by providing for choice.

Support for identifying Ardgay as having a Settlement Development Area is noted.

Public transport timings and disabled access to trains are not land use planning issues. If a planning application was submitted for land at the railway station, access is one of the issues that would be considered. Preferred access is via the existing station road.

Safer Routes to School is aimed at helping improve safety and removing barriers to walking and cycling to school. All schools in Highland are able to apply to the Council for Safer Routes to School funding. Funding from the Scottish Government's Cycling, Walking and Safer Streets programme has been approved by the Council for vehicle activated speed signs on the road between Ardgay and Gledfield Primary School.

There is already a footpath with streetlights running between Ardgay and Bonar Bridge. The planning permission for the new youth facility did not apply any conditions for improving the pedestrian/cycle link between Ardgay and Bonar Bridge.

Effective from the 1st April 2015, the Council is increasing the council tax charge for long term empty properties to 200% and this has been introduced to encourage owners to bring empty properties back into use.

Placemaking Priorities

Add the following:

"Avoid any adverse effect on Dornoch Firth and Morrich More SAC (including otter)."

"Support village centre regeneration and infill development of housing."

"Assist and promote economic development."

"Support additional tourist facilities."

The following will not be added: "Identify a range of sites for housing." "Identify sites for business/industry."

The following will be removed:

"Focus housing development beside the primary school".

AG01 Adjacent to Primary School and north of Church Street

This is an existing allocation in the Sutherland Local Plan with an indicative capacity of 6 units. This is the indicative capacity that will be used in the Proposed Plan and as long as access is taken from land adjacent to the Primary School it is not considered that there would be significant traffic impacts. Any requirements in terms of road capacity/safety would be determined via negotiation during the planning application process. Whilst it is acknowledged that this is a greenfield site, it is important to provide choice and flexibility of sites. It is always preferable to

develop brownfield sites but it must be recognised that brownfield sites can often have significant challenges which can affect the viability of development. CaSPlan will encourage the use of brownfield land but a range of sites must be provided. Having housing beside the school should reduce the number of car trips taking pupils to and from school.

This site is not owned by the Council so the proposal to turn part of it into a carpark would require either the landowner to agree to this or for them to sell it to the Council. Funding would need to be found to buy the land and do any of the associated work. The primary school has not asked for additional car parking to be provided.

AG02 Ardgay Railway Station Yard North

This site is currently allocated in the Sutherland Local Plan for business use. Network Rail has not indicated that they are unhappy about this allocation continuing. There is potential for small business units to be located on this land. It is felt that housing would be an inappropriate use to promote so close to railway sidings.

AG03 Ardgay Railway Station Yard South

This site is currently allocated in the Sutherland Local Plan for business use. There is already an established business use on the land so it would be preferable not to introduce housing to the site which may then sterilise the site against future businesses which may be classed as bad neighbour developments. By continuing the allocation it serves to highlight to anyone who looks at the plan that business land is available.

As per the SEA site assessment, a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding" and mitigation will be included in the Proposed Plan to protect the watercourse: "No culverting of watercourse and provide buffer between watercourse and development".

Lady Ross Site

The Lady Ross site was consulted on via the Additional Sites Consultation following on from its identification as a new site through the MIR consultation. The concern about the condition of the existing building is acknowledged and via the placemaking priorities the regeneration of the centre of Ardgay will be highlighted. It would be preferable to have a mix of uses on the site and therefore it will be included as an allocation in the Proposed Plan for Mixed Use.

Site Behind Ardgay Public Hall

The Site Behind Ardgay Public Hall was consulted on via the Additional Sites Consultation following on from its identification as a new site through the MIR consultation. One comment received thought that there was ample housing stock in the area and all the other respondents thought it would be best used as additional car parking.

The site is in Council ownership; however any proposal to turn the site into a carpark would require funding. There could be potential to transfer the site to a group, but these issues would need to be explored further in detail. The site is small and will not be shown as an allocation in the Proposed Plan. However, the settlement text will highlight the land behind the public hall as a potential place for additional car parking subject to suitable funding being found.

Other

The following sites will be allocated for development in the Proposed Plan: AG01; AG02; AG03 and AG04 (Lady Ross site).

The following site will not be allocated for development in the Proposed Plan: Site Behind Ardgay Public Hall.

Issue 7: Bonar Bridge

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Bonar Bridge	
List of respondents (including customer number):		
Ardgay and District Community Council (326) CH Architecture (4742) Creich Community Council (4930) Historic Scotland (4616) Joan Bishop (4896) John Cormack (2106) Marion Turner (2276) Scottish Environment Protection Agency (3115) SNH (204)		
Summary of the comments received:		
General		

Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)

Welcomes the recognition of the opportunity for the redevelopment of the Category B listed Old Migdale Hospital. A re-use for this property could be supported by providing a development brief for the site and identifying it as a placemaking priority. (4616)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)

Settlement boundary is drawn too close in to the existing housing which does not allow much scope for enlargement however a decision on where to redraw the boundary would depend on land being put forward for development. Future developments should not be discarded solely because they lie outwith the current settlement boundary. (4930)

Placemaking Priorities

Add the following: Avoid any adverse effect on Dornoch Firth and Morrich More SAC (including otter) and River Oykel SAC. (204)

"Develop remainder of Cherry Grove site before identifying other land" seems overly reactive and negative. Whilst no other land was put forward for development, we should allow for other development to go ahead if sites are identified. Perhaps there could be two separate priorities: develop reminder of Cherry Grove site; and identify other land for housing. (4930)

BB01 Cherry Grove

Site boundary on north east should extend up to the houses which face the playing fields.(4742)

A design statement should be required, including a landscaping plan which could include tree planting along field boundaries and within open space. Particular care needs to be given to the eastern part of the site, which is the most elevated and over which key views from the Migdale Road across the NSA pass (see Sutherland Housing Landscape Capacity Study, Map 45). (204)

Part of the site may be at risk from flooding from a watercourse. Add a Developer Requirement

for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

BB02 South Bonar Industrial Estate

The statement 'consolidate industrial estate' is vague. (4742)

The site is already fully developed. (4742)

There is no mention of the new Youth Centre which already has planning permission. (4896)

The current appearance of South Bonar Industrial Estate is a detractor of the Dornoch Firth NSA (to which it is adjacent), given the overall scenic location of the vicinity. Any further development here should be regarded as an opportunity to enhance the visual impact of the site. The LDP should therefore require a high standard of design, incorporating landscaping and screen planting. (204)

South Bonar Industrial Estate is in Ardgay and District Community Council Area. There should be further work done to enlarge and develop this site for business/industry. (2276)

This site is at risk of flooding from both the river and the sea. Add the following developer requirements: industrial use only; development limited to previously developed areas; and Flood Risk Assessment to inform layout and mitigation measures. (3115)

This site lies within Ardgay and District Community Council area and is mature and stable in its usage. There has been examination of this area in the past and evidence of this is the stone wall which fronts the site. There seems to be no purpose to including the site without suggestions for changes in the inclusive area, service provision and for industrial/commercial demand. (326)

Interim position agreed by Area Committee:

The strategy for Bonar Bridge focussed on carrying forward the sites from the Sutherland Local Plan, which provided for housing, community and industrial uses. The MIR recognised the potential opportunity for redevelopment of the Old Migdale Hospital. This will be taken forward into the Proposed Plan and added as a placemaking priority. It is recommended that sites BB01 and BB02 are carried forward into the Proposed Plan and that issues raised from the consultation be addressed through developer requirements.

Recommended Council Response:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

The reference to the redevelopment of the Old Migdale Hospital will be carried forward into the Proposed Plan. A placemaking priority will be added that says, "Sympathetic development of Old Migdale Hospital." The site falls within the Settlement Development Area which means that there is a general presumption in favour of development. A planning application has been submitted for the Old Migdale Hospital (15/00762/FUL) for conversion to create 12 dwellings and formation of two house plots, therefore a development brief is unnecessary.

The settlement boundary is drawn tightly especially to the north along the A836 and to the south along the A949. This is to stop ribbon development occurring along the edge of the road, elongating the settlement. The site at Cherry Grove is shown as suitable for development and there is land to the north east of the Cherry Grove boundary (top section of the hill) which although not part of the Cherry Grove site, is still within the settlement boundary. This land should provide ample development space for the lifetime of the plan. Development Plans have to be reviewed

every five years, so if extra development land is required it can be identified in the next review of the plan. Any development proposals that are submitted and lie outwith the settlement boundary will be assessed on their merits.

Placemaking Priorities

Will add "Avoid any adverse effect on Dornoch Firth and Morrich More SAC (including otter) and River Oykel SAC."

The Community Council thinks that "Develop remainder of Cherry Grove site before identifying other land" is overly restrictive. This could be amended to read ""Develop remainder of Cherry Grove site". This still highlights the important role of this site to the future development of Bonar Bridge, without appearing to be negative. The placemaking priorities will also be highlighting the opportunity for redevelopment of the Old Migdale Hospital.

BB01 Cherry Grove

The extra land requested to be included within the site area, is already within the Settlement Development Area which means that there is a general presumption in favour of development. Local Development Plans must be reviewed every 5 years; if after the 5 year period of this plan there is a need for further housing land, this land can be considered as an allocation and it would lend itself to the natural extension of development land at Cherry Grove. It would be preferable to encourage development on the existing extent of the allocation as it is closer to the centre of the village and would have fewer landscape impacts than development on the higher ground.

Sensitive siting and design will be required for this site due to its location within the Dornoch Firth National Scenic Area, especially the eastern end of the site which is the most elevated. A developer requirement will be included that asks for a design statement which includes a landscaping plan.

It is acknowledged that part of the site may be at risk of flooding from a watercourse. A developer requirement will be added that says, "Flood Risk Assessment required and no new development should be located in areas shown to be at risk from flooding."

BB02 South Bonar Industrial Estate

It is acknowledged that the site lies within the boundary of Ardgay and District Community Council. The statement 'consolidate industrial estate' was included as part of the reasoning for identifying it as a preferred site in the Main Issues Report. It was recognising that it is an existing and well established site with potential to improve on existing development, particularly the visual aspect of existing development.

It is acknowledged that the appearance of the site could be perceived as a detractor of the Dornoch Firth NSA given the overall scenic location of the vicinity. The Council, whilst recognising the important economic role of the site, is supportive of encouraging opportunities to enhance the appearance of the site. In order to help achieve this the allocation in the Proposed Plan will state that any new development/redevelopment of the site will be expected to achieve a high standard of design, incorporating landscaping and screen planting.

It is acknowledged that the site is at risk of flooding from both the river and the sea, as was identified through the Strategic Environmental Assessment of the site. The following developer requirements will be added, "Flood Risk Assessment required to inform layout and mitigation measures" and "development limited to previously developed areas". We are not proposing to enlarge the site, but consolidate what is already there. A developer requirement of, "industrial use only" will not be included. The site will be allocated for industrial uses, however it must be acknowledged that a community use is present on site and planning permission was given to provide replacement community facilities on the site. However the use of the site for community use will not be actively encouraged by including "community" as a use. Any development on this site needs to fit with existing and consented activities, including community uses, within the site.

Other

The following sites will be allocated for development in the Proposed Plan: BB01 and BB02

Issue 7: Brora

MIR Issue What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Brora	
List of respondents (in	cluding customer number):	
Allan Tubb (5122) Brora Community Counc Duncan Allen (5058) Iain M Sutherland (3657) Joan Daniels (5197) John Cormack (2106) Kathleen Cunningham (4 Network Rail (4974) Scottish Environment Pro SNH (204) Sportscotland (2087) Transport Scotland (363)) 1699) otection Agency (3115)	
Summary of the comm		
Sutherland Local Plan sh necessary by the mitigat		
Support the housing area	as identified in the Main Issues Rep	ort. (334)
	already going to Ross-shire for sup	to Sutherland in order to protect small permarkets. A protectionist attitude
Dingwall and Alness. Corrected and leisure failed	Dornoch, Golspie and Brora) do not onsideration should be given to deve cility to serve East Sutherland. The or recreational facility should be eva	eloping at least one community need in the wider community for at
The introduction should i waste water drainage. (3	include a clear statement requiring a 3115)	all allocations to connect to public
Placemaking priorities Retain "Regenerate towr	n centre". (assumed) (334)	
BR01 East Brora Muir A community developme	ent could be shown as a use. (334)	
	prora SSSI as identified in the SEA; dary in order to avoid any incursion i	development here should be confined into The SSSI. (204)
Part of the site may be a		

BR04 Former Radio Station

Why has housing been removed from the list of uses (assumed)? (4699)

This is adjacent to Inverbrora SSSI. Any development should be inland of the coastal footpath. Prominent site so a design statement should be required for development, with a preference for low rise and low density building design. (204)

As owners of the site, would like housing to be added to the potential uses, to leave more options open for the site. Excluding housing as a use restricts the viability of the area. The site was previously used as a repository for a furniture removal business, but is now surplus to requirements. The local economy is fragile and it would benefit everyone if the area around the site was tidied up. The area is often used for wild camping so could potentially operate a small caravan site in the grounds and use toilet facilities within the exiting building. If a caravan site was successful it may require a warden to live on site and a permanent dwelling would be required. Another use could be to develop a retirement area similar to the one at Barbaraville in Ross-shire. This would enhance the local area, provide employment and is a much needed facility. It may also be possible to use all or part of the Radio Station site as a residential home and have small, single storey houses on the adjoining land. (3657)

Support keeping site in plan, but housing should be added to the list of uses. (334)

Main access to site is over Brora LX AOCL crossing. Any proposal will require the developer to assess the impact on the crossing in a Transport Assessment so that level crossing risk is updated. Additional safety measures may be required. Other access to the sites is through a single lane underbridge. (4974)

Consider the retention and redevelopment for historical heritage. (5122)

Part of the site is at risk of flooding from the sea. Add a Developer Requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. The specific coastal processes mitigation outlined in the Environmental Report should become a developer requirement. (3115)

BR06 Former MacKay's Garage

Part of this site may be at risk of flooding from the river and the sea. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area to be shown at risk of flooding. (3115)

BR10 Tordale

There are features of local biodiversity/landscape value here (scrub covered bank that divides site, drystone dykes along Braambury Road) which should be maintained if the non-preferred status of the site is altered. (204)

BR11 Former River Fascally recreation area

This site should be considered for recreation use. (5122)

Upper Fascally (new site)

This land could be shown as suitable for regeneration/recreational purposes. (4699, 334)

Harbour and adjacent area

Would like to see this identified in plan for regeneration. (334)

Brora Station and Goods Shed

Would like to see regeneration of the Station and removal of the Goods Shed for extra carparking close to the surgery. (334)

Coastal erosion

Coastal erosion should be dealt with in the plan. (4699, 334)

ADDITONAL SITES

BR01 East Brora Muir (housing/community)

Additional use of community could possibly add to traffic using the sole access with the A9 (T) in this part of Brora. Discussions may be required with Transport Scotland on any further development using this access to ensure continued safe and efficient operation. (3636)

There are already lots of houses for sale in Brora, many for more than one year. I wanted to enhance part of my garden but was refused. My house has a public path, the length of my home and garden, this has been altered to a vehicle road and a street lamp put at the rear of my garage, I was never advised about this, I am surrounded by barbed wire fences, and left with an eye-sore. (5197)

Upper Fascally

The south eastern boundary of the site lies close to the River Brora and SEPA Flood Map. Need a Developer Requirement for a Flood Risk Assessment (FRA) and that no development should be located in the area shown to be at risk of flooding. (3115)

Sportscotland acknowledges that there are no clear plans as to how the site may be redeveloped. SPP safeguards outdoor sports facilities from development, unless one of the following conditions is met (paragraph 226): - The proposed development is ancillary to the principal use of the site as an outdoor sports facility: - The proposed development involves a minor part of the outdoor sports facility and would not affect its use and potential for sport and training; - The outdoor sports facility which would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location which is convenient for its users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for its users and which maintains or improves the overall playing capacity in the area; or - The relevant strategy and consultation with sportscotland show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site could be developed without detriment to the overall quality of provision. Sportscotland recommends: retention of the outdoor sports facility for that use; or as part of the LDP process, consideration of the loss of the outdoor sports facility against the criteria outlined in paragraph 226 of SPP to assess whether national policy is satisfied; or if none of the criteria outlined in paragraph 226 of SPP have been met and the site is still to be allocated for redevelopment, acknowledgment in the text of the Plan referring to the site containing/impacting upon an outdoor sports facility, and reference to the need for the requirements of the SPP to be met at the planning application stage. (2087)

Interim position agreed by Area Committee:

The MIR strategy focussed on providing housing growth around a central area including previously used land at Rosslyn Street, Former MacKay's Garage and the Old Woollen Mill. It is recommended that these sites be taken forward into the Proposed Plan. Through the MIR consultation two additional sites were suggested: Upper Fascally and Brora Station and Goods Shed. It was also suggested that BR01 have community use added to the potential uses of the site. It is likely that Upper Fascally would be suitable for regeneration/recreation purposes subject to any issues being addressed through developer requirements. Through the additional sites consultation there was no comments received on Brora Station and Goods Shed, however during the MIR consultation it had been suggested that the station should be regenerated and the Goods Shed removed to provide extra car parking. In preparing the Proposed Plan this will be considered alongside the overall priority of regenerating the centre of Brora.

It is recommended that BR03, BR04 and BR07 are taken forward in the Plan for the uses outlined in the MIR.

It is recommended that the non-preferred sites BR09, BR10 and BR011 and alternative site BR08 do not go into the Proposed Plan as allocations.

Recommended Proposed Plan content:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

Support for housing areas identified in the Main Issues Report is noted.

Placemaking priorities

Retain "Regenerate town centre".

BR01 East Brora Muir

This site was in the MIR with a preferred use of housing. Through the MIR consultation an additional use of "community" was suggested. As part of the additional sites consultation, "community" was added to the range of uses, with allotments suggested for land at the south western end of the site adjacent to the Day Care centre. A Transport Statement will be required with any planning application to assess the impact on existing residential streets and to identify any mitigation that is required. Traffic calming may also be required remote from the site. The site is already allocated in the Sutherland Local Plan for housing and is one of several sites providing choice for housing development.

BR02 Rosslyn Street

The SEA identified that the site is adjacent to Inverbrora SSSI. It is intended that the site boundary will remain the same as shown in the Sutherland Local Plan, which will avoid intrusion into the SSSI.

As per the SEA site assessment, a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

BR04 Former Radio Station

Support for retaining the site in the plan is noted.

In the existing Sutherland Local Plan the site is allocated for mixed use but housing is not listed as a potential use. The preferred uses for the site outlined in the MIR were tourism and recreation. During the MIR consultation it was suggested that housing be added to the range of preferred uses. However it is not felt that housing is a reasonable alternative use for the site. This comes from discussion with the Scottish Environment Protection Agency (SEPA) prior to publishing the MIR, where they had concerns about potential flooding, erosion and ground stability on the site. From these discussions and from the Strategic Environmental Assessment housing is not considered to be a suitable use of the site. The site will be allocated in the Proposed Plan as Mixed Use (tourism/recreation). This would allow the potential for a caravan site to be explored.

As per the SEA site assessment the following developer requirements will be added: "Any development should be inland of the coastal footpath"; "Design statement required with a preference of low rise and low density building design".

The concerns of Network Rail about potential access to the site over the Level crossing at Gower Street is acknowledged and as per their recommendation the following developer requirement will be added: "Transport Assessment to assess the impact of development on the Brora level crossing so that level crossing risk is updated and additional safety measures may be required following tye

assessment".

As per the SEA site assessment, the following developer requirements will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding" "; and "Need to address erosion and ground stability issues".

BR06 Former MacKay's Garage

As per the SEA site assessment, a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

BR10 Tordale

This site was non-preferred in the Main Issues Report. The issues of concern raised by SNH are noted; however it is recommended that this site does not go into the Proposed Plan as an allocation.

BR11 Former River Fascally recreation area

This site was shown as non-preferred in the Main Issues Report and it will not be taken into the Proposed Plan as an allocation. The site is at high risk of flooding and it is separate from the rest of the settlement, with no footpath link. The site has historically been used for recreation use and this use can continue. A reference to the site will be made in the settlement text in the Proposed Plan, indicating that it has potential to continue being used for recreational purposes, however due to its detachment from the rest of the settlement it will not be shown as an allocation.

Upper Fascally (new site)

Upper Fascally was consulted on via the Additional Sites Consultation following on from its identification as a new site through the MIR consultation. The use suggested to the Council was Mixed Use (community/recreation). It is outwith the settlement however it is a key site for regeneration. The following developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding". The comments from Sportscotland are noted. It is intended that this site continues to be used for recreation/community purposes and regeneration of this site for these uses would essentially upgrade the existing facility. There is a building on the site which houses the Brora Heritage Centre. This is moving to a new site at the Old School building and the existing centre will become redundant. The purpose of allocating this site for community/recreation is to encourage a re-use for this building and the regeneration of the entire site for community/recreational uses.

Harbour and Adjacent Area

Regeneration of the harbour and adjacent areas are considered to be vital for Brora and will be highlighted in the settlement text and placemaking priorities for Brora.

Brora Station and Goods Shed

This site was consulted on via the Additional Sites Consultation following on from its identification as a new site through the MIR consultation. The use consulted on was Mixed Use (community/business). No comments were received. This site will not be shown as an allocation in the Proposed Plan as it is a small infill site. The potential for regenerating the site and the wider impact on Brora is recognised. Therefore the site will be mentioned in the settlement text highlighting that there is potential to provide additional car parking and the potential to regenerate the Station.

Coastal Erosion

In considering the suitability of sites for development, we undertake Strategic Environmental Assessment which includes coastal erosion considerations. However the Local Development Plan's role whilst important is limited in addressing the issue of coastal erosion. The Council has a Coast Protection Policy Statement which was approved by Community Services Committee in

August 2014. It states that general protection of sports or recreational facilities will only be undertaken by the Council in exceptional circumstances. The Council will work in partnership with other agencies and contribute technical advice as well as facilitating funding opportunities.

Other

The following sites will be allocated for development in the Proposed Plan: BR01; BR02; BR03; BR04; BR05; BR06; BR07; BR12.

The following sites will not be allocated for development in the Proposed Plan: BR08; BR09; BR10; BR11.

Issue 7: Castletown

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Castletown		
List of respondents (including customer number):			
Scottish Natural Heritage (204) SEPA (3115) Christine Gunn (2014) George Campbell (239) Raymond Taylor (2016) Kerry Campbell (5091) Brenda Herrick on behalf of Castletown & District Community Council (248) R Ford (5055), Patrick Doake (5112)			
Summary of the comments received:			
General Agree with the overall vision for Castletown and would like to see it delivered (5091)			

Add the following to Placemaking Priorities – Avoid any adverse effect on Dunnet Links SSSI (204)

Further development between Thurso and Castletown could damage the balance (population vs remoteness) which exists at present. (5055)

Any new residential development in Castletown should include a requirement of native tree planting which help enhance and link to green corridors, particularly (CT01 and CT04). (5112)

Strategy for the area should focus on tourist industry to provide long term employment and it should aim to further establish the area as a outdoor sports destination (5112)

CT01

Type 2b ancient woodland in the north of the area should be safeguarded (204)

Questions the reasons for bringing development down towards the beach. Respondent considers the space as an important recreation area for people from all over Caithness. There is a sense of walking into nature and leaving urban development behind for a short time. Castlehill is considered as having potential redevelopment opportunities for heritage/tourism uses and development around it may make it a less attractive option. (2014)

Castletown & District Community Council note that there is no current demand for housing and developer Scotia Homes has postponed development. Access across the field between Castletown and Castlehill is not popular with residents and retail and business uses are better suited in the village centre. Development should be directed towards CT09 in the first instance. Leisure and tourist uses by the harbour would be beneficial but concerns over its deliverability. (248)

CT01 and CT04 are "integral to the feel of the harbour area" and are highly valued for recreational uses and development would seriously detract from the wild beauty. (5055)

Site should be extended to cover the area known as the Pilots House and it's surrounds, which is directly across the road from the Castlehill Heritage Centre, adjacent to the existing car park. The

building is on the Buildings At Risk register, it was identified in the Princes Foundation for the Built Environment in 2007 as well in the Castlehill/Castletown East Framework Adopted Plan 2002 as having "restaurant/tourism use potential". An outline planning consent was previously issued for a restaurant although not progressed. Over the last few years the building has been sympathetically repaired and rendered wind and watertight, to halt deterioration in the hope that it could be developed in the same timescale as CT01 Land between Castletown and Castlehill. There is a risk that if this building is not included as a Preferred Site in the CaSPlan then further deterioration could detract from CT01 improvements. (239)

CT02

Castletown & District Community Council agrees that the site could be tidied up but highlights that there is no demand for mixed use development. (248)

СТ03 & СТ04

These should avoid any adverse impact on Dunnet Links SSSI. Additional housing may increase the tracking pressure in the sand dunes as more people walk through the site to access the beach. Widespread tracking could be damaging to the SSSI. Depending on the scale of development a Recreation Management Plan may be necessary, with one component being positive measures to manage access through the dunes to the beach (204)

Castletown & District Community Council recognises that CT03 is in need of renovation but highlights no use has been identified for such a large building. (248)

Castletown & District Community Council - Although a housing development was proposed many years ago there is no demand for housing on CT04. (248)

CT05

Castletown & District Community Council note that existing greenspace at CT05 is attractive especially as the hall is now used for leisure uses. (248)

СТ06

Castletown & District Community Council note that CT06 is suitable for housing and business uses. (248)

CT07

Castletown & District Community Council note that it is currently business use so no change (248)

СТ08

Castletown & District Community Council note that the site is better to be kept as greenspace. (248)

СТ09

Castletown & District Community Council note that the site is currently an eyesore and is in need of urgent repairs following the recent storms. Partially occupied by engineering companies. Employment site which could help attract people back to the village (248).

The former lcetech site is the most suitable for business development and no other sites need to be identified. This will also prevent other unattractive commercial buildings being developed and protect the setting of the village. (5055, 5112)

CT10

Castletown & District Community Council agree with the Plan that additional housing land is not required. (248)

CT11

This is located within Dunnet Links SSSI and so we welcome it being classed as non-preferred. (204)

Castletown & District Community Council agree with comments in the Plan (248)

Respondent suggests that some tourist related development at each end of Dunnet Beach could be acceptable, e.g. horse riding, sea sports. (5112)

CT12

Welcome it being classed as non-preferred as from a desk appraisal it appears to be a wooded site (Ancient Woodland Inventory - Type 2b Long Established of Plantation Origin). Please note that the MIR does not give the reasons for these sites being non-preferred). (204)

Castletown & District Community Council agree with comments in the Plan (248)

Respondent bought the house for its quiet location at the end of a cul-de-sac and any further development would be strongly opposed. (5055)

Castlehill Estate

Owner of Castlehill Estate highlights the Princes Foundation Enquiry by Design process that was held in Castletown in 2007 by independent planners. Although relatively happy with the outcome there were concerns over architecture. Respondent would like to further discuss with the Development Plans team the size and positioning of the protected green corridor. (2016)

The area at Castlehill and Dunnet Beach has the potential to be a major tourist attraction providing development is appropriate. Agrees that the green corridors should be protected and enhanced both for recreational purposes and as they provide valuable shelter from the weather for the village. The green corridors are also important to attract visitors. (5112)

Respondent suggests the former boiler rooms for Castlehill House would make a visitor centre, storerooms and workshops for things such as woodworking classes. Access could then be gained into the woodland and a trail would take you by the Gate Lodge and a over Stangergill Burn, out at the old church and then through Garth Woods. Additional tree planting and traffic calming measures would be required. (5112)

A boat/pilots house could be built by the harbour to cater for fishing trips and wildlife trips as there is a variety of marine and bird life in Dunnet Bay. Other suitable leisure and tourist uses include bunkhouses, bird watching facilities and restaurants. (5112)

Additional Sites

Castletown Airfield has the potential to serve as a laydown area for utility companies and renewable energy companies, particularly as it has easy access to the B876 Wick/Castletown/Thurso road and the A836 road to Mey, where there is already marine renewable work occurring. (239)

Interim position agreed by Area Committee:

The strategy for Castletown within the MIR was largely based on the Castletown Masterplan prepared in 2009 by Prince's Trust and local community. We agree with comments suggesting that the amount of land allocated for development in the masterplan was too much and the growth rate was too optimistic. As a result we recommend that the Plan should allocate the sites which are considered the most suitable to be built out in the shorter term. Developer Requirements will be included to ensure that the key principles identified in the masterplan be incorporated into plans for relevant sites e.g. a tree lined boulevard from Traill Street to Castlehill.

Initial phasing of CT01 would include smaller Mixed Use allocations at land adjoining Traill Street and at the north east of the Castlehill area where a planning application is still valid. It is also recommended that CT04 is identified as a 'long term potential' site due to the existing access constraints. We agree with the Community Council and other respondents that the former Icetech site should be the focus of industrial uses. As such the former quarry (CT08) is not intended to be taken forward into the Proposed Plan. Recommended Council Response:

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Caithness Local Plan will be carried forward.

Strategy

The comments made on the strategy for Castletown are noted. We will continue to place focus on helping to provide support for a growing tourism market while also protecting and enhancing the green corridors.

"Avoid any adverse effect on Dunnet Links SSSI" has been added to the Placemaking Priorities.

The existing HwLDP Policy 51 Trees and Development does not require additional tree planting for all new houses. The Strategy for CaSPlan recognises the importance of the mature woodland and aims to safeguard, and where possible, enhance it. A tree lined avenue was identified as part of the masterplan as an important feature of CT01 and if CT04 (both are shown as long term sites in the Proposed Plan) is taken forward as an allocation in a future LDP review then adding to the existing green corridors will likely be an important component of the siting and design.

Sites

<u>CT01</u>

The inclusion of CT01 reflects the Castletown Masterplan which was produced in 2007 by the Prince's Trust following engagement and consultation with the local community. The masterplan included an optimistic level of development and as a result forms part of a long term vision for the village. The Proposed Plan carries forward many of the principles of the masterplan. However the masterplan identified significantly more housing land than is required. As a result is it is recommended that the land at Shelley Hill is shown as a long term housing site (with green corridors to the east and west) but that land at the former steading and land to the south (covered by planning application 11/00403/FUL) is allocated for housing, business and tourism uses.

It was envisaged that a wide boulevard could be created from the village centre to Castlehill which would also help to better connect the two areas.

The suggested inclusion of the building (Pilot's House) opposite the heritage centre has not been taken forward due to the size of the site. It will remain within the SDA where there is general support in principle of development. The heritage and tourism opportunities at Castlehill will also be promoted in the Placemaking Priorities.

CT02/CT03/CT04

The Community Council's concern regarding the need for and deliverability of the sites is noted. CT02 and CT03 are recommended to be taken forward as they are derelict sites which could be redeveloped into important tourist/heritage uses such as shops, restaurants or holiday lets. It is recognised that there is not a strong demand for housing at present. Therefore it is recommended that CT04 be identified as having long term development potential.

<u>CT05</u>

The site was carried forward from the existing local plan. However we agree with the community council that it is an attractive piece of greenspace. It is recommended that, and as the hall is now occupied, CT05 is not taken forward as an allocation in the Proposed Plan.

<u>CT08</u>

The site was carried forward from the existing Local Plan. However, due to the proximity to the neighbouring residential properties it is not considered suitable for industrial uses. We therefore recommend that the site is not taken forward in the proposed plan and that the site is excluded

from the SDA.

<u>CT09</u>

We agree with the comments that the lcetech site is the most suitable site for business and industrial uses. We recommend that the site be allocated for industrial/business uses to encourage a wider range of potential employers.

CT10/CT11/CT12

CT10, CT11 and CT12 are not recommended to be taken forward for allocation. There are better alternative sites than CT10; CT11 is located within a SSSI and would have significant environmental and visual impacts; and CT12 is within mature woodland and at risk of flooding.

Castlehill Estate

The landowner of Castlehill Estate outlines some interesting proposals, many of which could greatly improve the tourism experience and recreational value of the harbour and Castlehill area. As mentioned above, we intend to promote the variety of tourism and recreational opportunities in and around the village.

Additional Site Suggestion

The former airfield at Castletown is not being recommended to be taken forward as an allocation in the Plan as it is detached from the village and there has been little interest in developing the site in many years. As a brownfield site its redevelopment would be supported in principle by Policy 42 Previously Used Land in the HwLDP.

Issue 7: Dornoch

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Dornoch	
List of respondents (in	cluding customer number):	
Alexander Thomson (4729) Alison MacWilliam (4852) Ann Beasley (5087) Becky Murray (5072) Christopher Murray (5098) Duncan Allen (5058) Halliday Fraser Munro on behalf of ANM Group Ltd (3689) Jerry Bishop (3665) Joan Bishop (4896) John Cormack (2106) Scottish Environment Protection Agency (3115) SNH (204) Treecraft Woodwork Ltd (4695)		
Summary of the comm		
	nsion at Burghfield and potential access issues. (48	396)
No mention of Dornoch Economic Masterplan. (4896) Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)		
There is no mention in the settlement text of the numerous natural heritage protected areas nearby. Text should be added similar to, "It sits adjacent to Dornoch Firth National Scenic Area, Dornoch Firth and Morrich More Special Area of Conservation, Dornoch Firth and Loch Fleet Special Protection Area/Ramsar and Moray Firth Special Area of Conservation. (204)		
Add a developer requirement to all housing/mixed use allocations in the proposed plan that any development proposals will need to be accompanied by a Recreational Management Plan as per the text in the existing Sutherland Local Plan. Further consideration of this should be given during the Habitats Regulations Appraisal of the plan. (204)		
Agrees that tourism is a major source of income and work is underway to "rebrand" the town. This is positive and it is essential that the tourist season is extended and facilities appeal to a wide range of visitors. If Dornoch could establish itself as a tourism hub it would have a positive impact on employment in the area. (4852)		
Public transport links need to improve with more regular express connections with Inverness and Tain. (4852)		
Dornoch needs a new co encouraged to locate in	ommunity centre and sports facilities and businesse Dornoch. (4852)	es need to be
Dornoch is the only succ	ess in Sutherland. The text for Dornoch should hig	hlight the reasons

why: tourism and the influence of Skibo and its American connections; good schooling and further education; and the influence of the Dornoch Bridge. There is great scope in the development of skills at the North Highland College campus. Dornoch needs to be attractive to encourage new people to come and live there so the kind of housing provided needs to be carefully considered. (5058)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)

Additional Site

Within the Hinterland area grid reference NH/76941/90639 I would propose a single dwelling property to be sited in harmony within the existing housing development, I believe this would round off/infill the existing development within the Evelix area and help address accommodation needs within the Dornoch area. (5098)

Placemaking Priorities

Add, "Avoid any adverse effect on adjacent European sites (individually or cumulatively), including through recreational disturbance/damage." (204)

DN01 Dornoch North

Treecraft Woodwork lies within 30 metres of DN01 and creates a certain amount of operational noise. There should be a buffer between Treecraft Woodwork, the Industrial Estate and any residential properties in DN01. (4695)

A distributor road is needed to access this site. (4896)

This site is well placed for mixed development as it has easy access to the town without being obtrusive to visitors. This large site together with site DN05 should provide sufficient housing for years to come. It would be a mistake to build too many houses too soon as there are already many houses which have been on the market for a long time. (4852)

Part of the site is at risk of flooding from the Dornoch Burn. Add developer requirements for: Flood Risk Assessment and no new development to be located in any areas shown to be at risk of flooding; and no culverting for land gain. (3115)

DN02 Dornoch South Abattoir

This site should be redeveloped or removed as it is an eyesore. (4852)

Supports DN02 for a mix of uses. Would like site boundary extended to include the south east corner, in line with the Dornoch South Masterplan. Would like "leisure" to be added to the range of potential suitable uses on the site. (3689) Need to look at email and masterplan

Part of the site is at risk of flooding from the Dornoch Burn. Add developer requirements for: Flood Risk Assessment and no built development to be located in any areas shown to be at risk of flooding; and car parking only acceptable use of south area of the site which is at risk of flooding. (3115)

DN05 Meadows Park Road

Only about 30 houses completed on the site. (4729)

DN09 West of Meadows Park Road

Site not mentioned in Dornoch Economic Masterplan as a possible location for housing. Questions the suitability of the site for housing in terms of potential flood risk, as it is shown as at risk from flooding on the SEPA Flood Maps. Small areas shown to be at high risk. Drainage ditch on east and west boundaries, one running centrally through the site north to south and one running east to west. The west to east one continues on parallel to the Sutherland Road to the Dornoch Lochans where it turns and flows into the sea. Has it been decided what would happen with these drainage ditches if the site was developed and the potential impact on flooding? There is a layer of peat on the site resting on sand and this has potential impacts on flooding. Concerned about the long term impact of rising sea levels and sand dune erosion on this site. Concerned about visual impact of development on the site. What assessments have been carried out on what the impact of development on this site might be on nearby conservation sites, otters (a protected species) and many other birds and animals which can be found on the site. Otters have been sited in the watercourses and drainage ditches. (4729)

Welcome this site being non-preferred as it extends into Dornoch Firth NSA in the south and west. The farmed coastal flats here form a contrast to the wilder hills beyond to the south of the firth. If longer term development land is to be identified or implied, it is recommended any area here should be reduced to the north east part of the site. (204)

There is no need to extend development onto this site as it would only elongate the town and detract from the attractive entrance to Dornoch. This site should not be developed until DN01, DN04 and DN05 are fully developed and there is a clear need for additional housing land. (4852)

DN10 West of Sutherland Road

Site not mentioned in Dornoch Economic Masterplan as a possible location for housing. Questions the suitability of the site for housing in terms of potential flood risk, as it is shown as at risk from flooding on the SEPA Flood Maps. Southern boundary has a large drainage ditch that runs full length parallel to Sutherland Road and also connects with some of the drainage ditches in site DN09. Has it been decided what would happen with these drainage ditches if the site was developed and the potential impact on flooding? There is a layer of peat on the site resting on sand and this has potential impacts on flooding. Concerned about visual impact of development on the site. (4729)

There is no need to extend development onto this site as it would only elongate the town and detract from the attractive entrance to Dornoch. This site should not be developed until DN01, DN04 and DN05 are fully developed and there is a clear need for additional housing land. (4852)

Does not want views from family home spoilt by an unsightly development. Development should be kept at the same level as those currently off Sutherland Road. (5072)

Did not receive a letter informing them of this site option. Does not support site because: there is not enough teachers or places at the school; questionable whether the existing sewage works would cope; buildings may be out of keeping with the surrounding areas; would create traffic problems. (5087)

Access to DN09 and DN10

Sites DN09 and DN10 together seem to be in excess of double the area of DN05 and so could possibility take another 200 houses in addition to those planned for DN05. This would mean making provision for an extra 250/300 cars in the west of Dornoch. At present those living in the west end of Dornoch tend to use the minor access road (Sutherland Road) to access the A9 when travelling south. It is a single track road with passing places. It is also a popular route for cyclists and walkers who use it to access Camore Woods. There is no footpath or cycle path. If more traffic used this road because of more houses being built this road would need to be upgraded. (4729)

ADDITONAL SITES

DN02 Dornoch South Abattoir

Site is currently an eyesore, especially for tourists. It is near the town and so detracts from it. Any development here would be welcomed although the ones suggested seem particularly relevant. (4729)

An excellent addition to the plans. (3665)

SEPA notes that it is proposed that this site is enlarged and leisure is added to the range of uses. Much of the site is at risk of flooding. As a result SEPA is concerned regarding the proposal to increase the scale of the allocation without any clear idea of what is proposed. SEPA will object to this allocation unless there are clear Developer Requirements for (1) FRA and no built development to be located in any areas shown to be at risk of flooding, and (2) agreed limited acceptable uses of south area of the site which is at risk of flooding. For example, use as car parking. (3115)

Interim position agreed by Area Committee:

Existing housing allocations in the Sutherland Local Plan at DN01, DN04 and DN05 provide ample supply of housing land for Dornoch and it is recommended that these are carried forward into the Proposed Plan.

Through the MIR consultation it was suggested that DN02 be extended to include the south east corner, with leisure added to the range of potential suitable uses. The MIR highlighted the potential risk of flooding for this site and further investigation needs to be carried out before a recommendation is stated for whether a extension to the boundary and another potential use would be suitable.

It is recommended that the non-preferred sites DN09 and DN10 do not go into the Proposed Plan as allocations.

Recommended Proposed Plan content:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

The settlement text will make reference to the North Highland College UHI potential expansion at Burghfield and the desire to provide residential accommodation for students in Dornoch.

The important role of tourism is noted and agreed. The Dornoch Economic Masterplan was commissioned by Highlands and Islands Enterprise and it highlighted the importance for Dornoch of raising the profile of the town in the tourism industry. The settlement text in the Proposed Plan will make reference to the Dornoch Economic Masterplan and the important role of tourism to the town.

It is noted that there was no reference in the MIR settlement text about the numerous natural heritage protected areas nearby. The Proposed Plan will have expanded settlement text and this will include text similar to, "It sits adjacent to Dornoch Firth National Scenic Area, Dornoch Firth and Morrich More Special Area of Conservation, Dornoch Firth and Loch Fleet Special Protection Area/Ramsar and Moray Firth Special Area of Conservation".

The adopted Sutherland Local Plan established the requirement for a Recreational Management Plan to be submitted with new development proposals which examine any likely increased pressures from recreational access of the sand dunes or disturbance to wintering or breeding birds arising from the development, due to European protection. This requirement will be carried forward into the Proposed Plan and further consideration will be given during the Habitats Regulations Appraisal of the plan.

Planning permission has been granted for a new community centre on part of Dornoch's Meadows Park. This will provide a modern building for community uses and will link to existing recreational and sporting interests on the site.

The settlement text for Dornoch will highlight the important role the town plays for attracting tourists to the area and the important role it plays in education. However when it comes to the kind of housing provided, generally the market dictates what house builders will provide.

Additional site

Single house sites are not generally promoted through development plans, especially those outwith settlement boundaries. Anyone wishing to make enquiries about a single house site can use the Council's Pre-application advice for local development service or can submit a planning application.

Placemaking Priorities

Will add the following: "Avoid any adverse effect on adjacent European sites (individually or cumulatively), including through recreational disturbance/damage."

DN01 Dornoch North

This is an existing allocated site in the Sutherland Local Plan. The support for this site as a mixed used development is noted. There is an approved masterplan for the site and it provides a buffer of a mixture of open space and woodland between the site, the industrial estate and existing residential properties. The agreed masterplan includes a neighbourhood road linking the Embo Road to Poles Road.

It is noted that the site is at risk of flooding from the Dornoch Burn. As per the SEA site assessment, developer requirements will be added: "Development should be in line with existing agreed FRA, or FRA work to be extended if proposals vary or site extent larger. No new development to be located in any areas shown to be at risk of flooding. No culverting for land gain."

DN02 Dornoch South Abattoir

Support for the redevelopment of the site is noted.

Following the MIR consultation this site was part of the additional sites consultation, with an extended boundary to the south east and additional use of "leisure". "Recreation" will be added to the mix of uses rather than "leisure", to maintain consistency with the rest of the Proposed Plan. Examples of the type of recreational use which would be appropriate will be included. The boundary of the site extended and the settlement boundary amended as necessary. It is acknowledged that the site is at risk from flooding and that this will limit the extent and type of development suitable for the site. Any application would need to be supported by a Flood Risk Assessment and appropriate developer requirements will be added to the allocation.

DN05 Meadows Park Road

Comment noted. This is an existing allocation with planning permission.

DN09 West of Meadows Park Road and DN10 West of Sutherland Road

The Dornoch Economic Masterplan is not a land use development plan and as such is not the vehicle for identifying land for housing development. The issues raised by people during the MIR consultation were identified through the SEA site assessments and where appropriate mitigation was identified. However these two sites were shown in the Main Issues Report as non-preferred as there was already sufficient choice and quality of housing sites within Dornoch at Dornoch

North, Meadow Park Road and Bishopsfield, without elongating the settlement further to the west. For this reason these two sites will not go into the Proposed Plan as allocations. There may remain potential in the longer term for these sites to be developed once other sites have been completed.

Other

The following sites will be allocated for development in the Proposed Plan: DN01; DN02; DN03; DN04; DN05; DN06; DN07.

The following sites will not be allocated for development in the Proposed Plan: DN08; DN09; DN10.

Issue 7: Edderton

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MIR Issue	What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Edderton		
List of respondents (in	cluding customer number):		
Historic Scotland (4616) Edderton Community Council (4545) G H Johnston Building Consultants Ltd on behalf of Caledonian Forestry (3683) Reay Clarke (4929) Robert Wylie (4684) Scottish Environment Protection Agency (3115) Scottish Government (4616) SNH (204) Strutt and Parker on behalf of Balnagown Estates (5115)			
Summary of the comm	ents received:		
General Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)			
Welcomes the identification of a Settlement Development Area at Edderton. The SDA (as proposed) is an accurate representation of the extent of the village, its shape and structure, its infrastructure networks, physical limits and landscape setting. (3683)			
Welcomes the identification of Edderton as a settlement. (5115)			
	The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)		
Edderton has a remarkable setting and the present lay-out of the village gives it character. More houses are required but great care must be taken that the positioning of these houses will add to the character and detract from it. (4929)			
A conservation area review should be done for Edderton as it is rich in Pictish and other archaeological features. (4929)			
Placemaking Priorities Add "Avoid any adverse effect on Dornoch Firth and Morrich More SAC or Dornoch Firth and Loch Fleet SPA". (204)			
Given the significant historic environment issues in the settlement, would recommend adding the safeguarding of these historic environment assets as a place-making priority for the settlement. (4616) (Historic Scotland)			
ET01 Northeast of Haven Support the continued identification of ET01 for housing development. (5115)			

This allocation contains the scheduled monument Carriblair, stone circle and cist (Index no 2971).

Historic Scotland has concerns regarding the issue of access and its impact on the scheduled monument. It is unlikely that scheduled monument consent would be granted for works associated with the creation of an access to this development site. Therefore the developer requirement should reflect the discussions that took place in relation to application 08/00477/FULSU. (Historic Scotland)

Considers this to be the prime site for future housing needs and should be allocated for housing. It could be extended westwards to include some land surrounding the hotel. The Stone Circle at the west end of the site must be rescued and cared for. (4929)

ET02 Adjacent to Glebe Cottage

Part of the site may be at risk of flooding from a small watercourse. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

Excellent site for future housing. (4929)

ET03 West of Station Road and Balleigh Road

Does not support this site as it sits on an Ancient Monument site the Celtic/Pictish Clach Biorach. Provision must be made to protect the stone. (4684)

Southern part of this site (south of the A836) could have adverse landscape impacts. It is separated form the defined settlement of Edderton by the A836 and development here would not reinforce the existing reasonably nuclear settlement pattern but expand the settlement towards other surrounding areas including Balleigh and Balblair. Currently these smaller settlements are defined by their separation which includes open farmland and woodland. The open land to the south of the A836 contributes to the landscape setting of the surrounding smaller settlements. If the Proposed Plan maintains allocating the part of ET03 south of the A836 for Mixed Use, we recommend open space and structural landscape tree planting should form primary components of design here. The principles of placemaking should be demonstrated, e.g. via a masterplan. (204)

Supports the identification of ET03 as a preferred site and strongly encourages the Council to allocate all of the land at ET03 for development either side (north and south) of the A836 in the Proposed Plan to help deliver development in the interests of a sustainable community. All of the land is in the ownership of Caledonian Forestry. The principle of development - residential, community and open space - should be consolidated within the Proposed Local Development Plan by the allocation of all of the land ET03 and provision made for an integrated framework plan relating to the layout and phasing of development, open space, playing field, local facilities and structural landscaping. ET03 sit comfortably within that shape and structure of the SDA as shown in the MIR and presents logical opportunities for development. Part of the land at ET03 has planning permission and that approval (06/00483/FULSU) has commenced. Therefore that land should appear as an allocation in the Proposed Plan. The same land is an allocation for development in the adopted development plan. Caledonian Forestry wishes to impress that their landholding offers potential for community facilities including of a commercial type e.g. local shop (in addition to housing), a kick-pitch and playing field. The MIR refers to "some restrictions" but is not explicit. Caledonian Forestry would respect archaeological interests, structural landscaping and safeguards for the water supply to the distillery, as factors that both inform, and require to be integrated with any development framework. It is necessary that all of the land at ET03 are allocated in the Proposed Plan, the reasons for this and the principles that govern the delivery of housing land are as follows:

The delivery of housing development at Edderton has been stymied by modest demand and high service costs. In small rural communities the balance of these factors is acute and absolute insofar as it is fundamental to the viability of any development.

In identifying ET03 as a preferred land allocation, the local development plan is facilitating a fresh approach to delivering housing and that would also respond to the 10-20 year timeframe.

The planning permission (06/00483/FULSU) for 37 houses (25% affordable homes) is unlikely to present a viable market proposition in its present form or for the immediate future be of interest to the volume builders (as had been envisaged when approval was granted).

The cost of servicing the land (06/00483/FULSU) is high in relation to the likely rate and scale of development and its market value. None of that land is capable of development without on-costs exceeding £100,000 on off-site drainage, BT safeguards and a footpath. The approved layout enables 3 plots fronting Station Road. The equivalent affordable homes contribution would be £4,000 per plot: the market value of a residential plot is estimated at £40,000. This gives the frontage land at Station Road (on the basis of the approved layout) a negative value; but that could be alleviated if it is brought forward in conjunction with the land south of the A836 (west of Balleigh Road).

The land needs therefore to be attractive to smaller-scale developers - partnership/design-build schemes (based on say, 8-12 homes, over time) and the individual self-build, local needs market. It must avoid costly safeguards or diversions for existing services (distillery water pipe and overhead electricity) and maximise spare capacity in existing infrastructure (roads) and amortise any essential expenditure notably on foul drainage.

It must also be flexible in response to the unknown scale, rate and timing of any development; and it must offer sufficient critical mass (economically developable sites) to give security against any essential upfront investment in infrastructure, which is fundamental to any release of land for development.

That potential is located alongside and in the margins of the existing village road network and it therefore includes land west of Station Road and west of Balleigh Road north and south of the A836. A linear form of incremental development would be in keeping with the established pattern of development and character of village streets; and it would enable development on the same side of the A863 as the primary school and for commercial development, a position visible to passing trade.

Where such development potential lies to the west of Balleigh Road, it need not require new roads or footpaths or electricity supply or foul drainage nor require to cross (and therefore safeguard) the distillery pipe.

Taken as a whole, that land (north and south of the A836) would also provide flexibility for community preference as to the location of the (temporary) kick-pitch, the positioning a playing field (committed with (06/00483/FULSU) and the siting of a commercial business.

By comparison, any back-land development of the land with planning permission (06/00483/FULSU) would require new or extended services (roads, water, drainage, electricity, footpaths) and therefore additional, higher costs and as a result, present less prospect of viability. The options require a comprehensive approach and a development framework - prepared in consultation with the local people - for all of the land owned by Caledonian Forestry north and south of the A836 as identified in the Main Issues Report as a preferred site. Caledonian Forestry therefore encourages the Council to respond accordingly by allocating that land in full.

A comprehensive approach and development framework should be prepared in consultation with local people. (3683)

Does not support development of the part of the site which is south of the A836 - the Heather Hut field. (4545)

Welcomes the mitigation outlined in the site assessment of the environmental report for this site.

Content that the appropriate delivery of this mitigation should avoid significant impacts on the site and setting of the scheduled monument Clach Chairidh, symbol stone (Index no. 1673). (4616)

To protect existing water users a developer requirement should be added which states that any proposal on the site should avoid discharge to the Craigroy Burn. (3115)

Welcomes the mitigation outlined in the site assessment for this site in the environmental report. Content that the appropriate delivery of this mitigation should avoid significant impacts on the site and setting of the scheduled monument Clach Chairidh, symbol stone (Index no. 1673). (Historic Scotland)

The Heather Hut Field west of Balleigh Road section of the site is totally unsuited for future use as a site for mixed use because: it is a good arable field and should be retained as such; anyone going to or coming form the village would have to cross the A836; the plan submitted by the planning consultant for the site, shows almost ribbon development of houses alongside Balleigh Road and the A836. This is exactly the kind of development the Town and Country Planning Acts were designed to prevent. The section of the site at Stoney Field, west of Station Road is totally unsuited for future use as a site for mixed use because: it is a good arable field and should be retained as such; a stone built underground aqueduct runs across the field south to north which carries water to Balblair Distillery and this could be a major obstacle to a housing development; a 33ky Electric Trunk power line and other power lines cross the field; the kick pitch would be destroyed; The Standing Stone, Clach Charaidh, is the pointer for the near-by stone circle. These together with the distant mountains form the solar calendar. Any building of houses in the Stoney Field will destroy the panoramic view from that stone circle to the distant mountains and thus the reference points of the solar calendar; there is an untold wealth of history buried in the soil; the character of the village would be destroyed if any houses were built on this site (4929)

ET04 Edderton Glebe

Do not support this site because of access across the railway. (4545)

This is partly located within Dornoch Firth NSA and is adjacent to Dornoch Firth & Loch Fleet SPA and Dornoch Firth & Morrich More SAC, and so we welcome it being classed as a non-preferred site. (204)

Interim position agreed by Area Committee:

Through the MIR consultation there were a number of comments made on ET03. The northern part of the site West of Station Road is an existing allocation in the Sutherland Local Plan and there is planning permission for the site. It is recommended that this part of the site be carried forward into the Proposed Plan. The southern part of the site which sits to the south of the A836 has attracted some opposing comments. It has potential merits for development, however if this is taken into the Proposed Plan, there would need to be clear guidelines as to what would be acceptable development.

It is recommended that ET01 and ET02 are taken forward in the Plan for the uses outlined in the MIR.

It is recommended that the non-preferred site ET04 does not go into the Proposed Plan as an allocation.

Recommended Council Response:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

The support for identifying Edderton as a settlement with an SDA boundary is noted.

Placemaking Priorities

The following will be added: "Avoid any adverse effect on Dornoch Firth and Morrich More SAC or Dornoch Firth and Loch Fleet SPA".

A placemaking priority will be added to safeguard the historic environment assets in the settlement.

ET01 Northeast of Haven

Support for the continued identification of this site for housing development is noted.

This site is an existing allocation in the Sutherland Local Plan. A planning application was submitted for the formation of 26 serviced housing plots and following a Section 75 agreement was approved in March 2015. The Decision Notice states that a further detailed planning application must be submitted detailing amongst other things, access. There is no intention at this time to extend the boundary of the site in a westwards direction.

ET02 Adjacent to Glebe Cottage

Support for the use of this site for housing is noted.

As per the SEA site assessment it is noted that part of the site may be at risk of flooding from a small watercourse, so a developer requirement will be added: "Flood risk assessment required and no new development should be located in areas shown to be at risk of flooding".

ET03 West of Station Road and Balleigh Road

There is a mixture of support and non-support for this site. In general most of the non-support is for the section of the site which lies to the south of the A836, what is known locally as the "heather hut field".

Planning permission was granted for the site that lies to the north of the A836, for development of 37 houses. Whilst this permission is "locked on", there have been no houses built on the site. The developer had asked for land to the south of the A836 to be included within the site allocation. This was shown as part of ET03 in the Main Issues Report as a preferred site. Following comments received on the MIR there was some concern about the land to the south of the A836. The current settlement lies to the north of the A836 and there remains sufficient land for development without encroaching onto land to the south.

There is potential for short term development of houses along the A836 and Station Road frontages of the site north of the A836 as long as access to the remainder of the site is maintained.

ET04 Edderton Glebe

The non support for this site is noted. This site was shown in the Main Issues Report as nonpreferred as there is sufficient alternative land within the settlement and there are issues with crossing the railway line. It will not be taken forward into the Proposed Plan as an allocation.

Other

The following sites will be allocated for development in the Proposed Plan: ET01; ET02; ET03. ET03 will however be renamed to West of Station Road as the section of land to the south of the A836 will not be included in the allocation.

The following sites will not be allocated for development in the Proposed Plan: ET04.

Issue 7: Golspie

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Golspie	
List of respondents (in	ncluding customer number):	
Allan Tubb (5122) David Walker (4845) Highland Council – CPAM Team (3627) John Cormack (2106) Lesley Cranna (4846) Lindsay & Co (4939) Rory Murray (5083) Scottish Environment Protection Agency (3115) Shona & David Duncan (4842) SNH (204) SNH Golpsie Office (5117) Transport Scotland		
Summary of the comments received:		
General The MIR concentrates on future development but given the underutilisation already on the		

The MIR concentrates on future development but given the underutilisation already on the business area GP02/03 further development may be ambitious and any monies should be spent on existing facilities to support these (4845)

Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)

It is acknowledged that the A9 is the main access for many sites in Golspie. It is recommended that the Council discuss the access strategies and potential impacts of these sites with Transport Scotland. SPP states that new junctions of trunk roads are not normally acceptable, although it is recognised that the trunk road is the main road within Golspie. (Transport Scotland)

GP01 Drummuie

Supermarket development should be specifically excluded. (4846)

Supports any sort of development which raises the profile of Golspie and supports the local economy however this site is directly beside the representees property (Drummuie House) which is a holiday let. This business brings tourists to the area and the main selling feature is the location, scenery and wildlife. The road at the front of the property is already used for the Council office. Concerned that more development on the site would increase the amount of traffic going past their house and the extra noise. Also concerned about noise and visual pollution during any future building work on the site. Suggesting that if there is future development on the site, that access to the Council office be directed behind their property. (5083)

Any development must be carefully managed with regard to scale, materials and elevation as the site is prominent and can be seen from significant distances, particularly from the road to

Littleferry. (5122)

Part of this site may be at risk of flooding from a watercourse. Add a developer requirement for a Flood Risk Assessment and no new developments should be located in the area shown to be at risk of flooding. (3115)

GP02 Golspie Business Park

As owner of an office building in GP02, support use of it for business uses which are in keeping with the current use of the site. Less supportive of business use which would result in increased noise or disturbing activities. (5117)

Part of this site may be at risk of flooding from a watercourse. Add a developer requirement for a Flood Risk Assessment and no new developments should be located in the area shown to be at risk of flooding. (3115)

GP03 West of existing Business Park

Support the use of this land for business use. (3627)

Strongly object to the inclusion of this site. GPO2 has been underused for years and no further allocations should be identified until it and GP01 are full. GP03 was unanimously rejected by local residents present at the meeting for the previous local plan. Serious concerns were raised about the threat to local shops from a new supermarket at the site and it would also make an unsightly entrance to Golspie. The plan should protect the entrance to Golspie with its panoramic views to the sea and the beach. Development at this site can not be screened from the road as the road is above the site. The suggestion in the text that "retail use is not preferred" may be an attempt to discourage supermarkets but this would not discourage a determined supermarket developer. A supermarket should not be allowed to ruin the centre of Golspie and its local shops that create employment. Site should be removed from plan. (4846)

There should be no retail development on this site as it would impact negatively on the village. (4845, 4939)

Would prefer GP02 to be filled before GP03 was considered as a new site. If this site is to be taken forward, would prefer for a new entrance to be taken from the A9 rather than through GP02 as this would increase traffic and noise around the SNH office. Would not support a route along the front of their office building as the road sits between the office and the carpark. The boiler for the SNH office on GP02 lies on the boundary between GP02 and GP03 and some separation distance may be required. (5117)

This is a sensitive site in landscape and visual terms, being a key site on the gateway to the village from the south, with views from the A9 seawards. Given the topography, it may not be possible to achieve effective screening of any development here in terms of these key views. It falls within the area identified in the Sutherland Housing Landscape Capacity Study (2006) as unlikely to be suitable for development due to value of scenic resource (Map 50). While a high quality of site layout, design, landscaping and screen planting should be stipulated if this is taken forward to the Proposed Plan, we consider that this should be a medium term allocation, not to be developed until other existing business sites at GP02 (Golspie Business Park) and GP01 (Drummuie) have been fully developed. (204)

GP04 Mackay House Hostel site

The site should be cleared of building rubble and further assessed for contamination.(5122)

GP06 Sibell Road

Representee made comments on the planning application for the site and would like the points raised in this submission to be taken into account: concern about drainage from the site, part of the site is a wet area and herons can be found nesting on it; does not think that with the poor drainage, the site can cope with the number of houses proposed; would generate a large volume of traffic onto an already busy road, Sibell Road has a lot of onsite parking; pavement only on one side of road so concerns about pedestrians crossing the road; part of the site is forest and the removal of this would generate heavy traffic. Now that permission has been granted for the site representee still has concerns about: pedestrian crossing safety; lying water is becoming more of an issue on the site and in the representees garden; on street parking still an issue and amount of traffic on road has increased. There should not be over building on the site. (4842)

Coastal Erosion

There is no mention of protection of existing tourist facilities from coastal erosion. Without coastal protection measures these will be lost and the area is already fragile. (4845)

Interim position agreed by Area Committee:

The strategy for Golspie focussed on carrying forward the sites from the Sutherland Local Plan, with the addition of GP03 for business use. It is recommended that these sites apart from GP03 are taken forward in the Plan for the uses outlined in the MIR. GP03 attracted some opposition through the MIR consultation with the view that GP01 and GP02 provided enough business land for the timescale that the Plan would cover. It is likely that this site will not be carried forward into the Proposed Plan.

It is recommended that the non-preferred sites GP08, GP09 and GP10 do not go into the Proposed Plan as allocations.

Recommended Proposed Plan content:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

We welcome the acknowledgement from Transport Scotland that whilst the A9 is a trunk road, it is also the main road within Golspie. We also note that SPP states that new junctions off trunk roads are not normally acceptable. The only sites within Golspie that have direct access onto the A9 are GP01 Drummuie and GP02 Golspie Business Park, both of which are partially developed with access already provided onto the A9 to trunk road standard. Transport Scotland will as a matter of course be consulted on any further planning applications for these sites or any others which may have potential impact on the trunk road.

GP01 Drummuie

Retail use is not listed as a potential use in the Main Issues Report and it will not be listed as a potential use in the Proposed Plan. The importance of the centre of Golspie for serving the wider community and the impact of any retail loss is acknowledged. The Proposed Plan will contain a policy based on the Town Centre First Principle whereby it will be recognised that settlement centres play a key role in serving wider communities. Golspie plays a key role in serving wider communities.

This site is already allocated in the Sutherland Local Plan. Any development proposals submitted for planning permission will be looked at in detail and it is at this stage that issues such as noise and visual pollution during construction and access to existing developments etc. would be considered. If deemed necessary, planning conditions would be attached to a planning permission.

During the assessment of a planning application, things such as scale, materials and elevation are
assessed. Part of the site is already developed and a developer requirement will be included in the Proposed Plan for landscaping and planting to provide screening at the gateway to Golspie. The existing Drummuie Development Brief provides approved non-statutory planning guidance on the development potential of the site.

As per the SEA site assessment, it is acknowledged that part of this site may be at risk of flooding from a watercourse and a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

GP02 Golspie Business Park

This is an existing allocation for business use in the Sutherland Local Plan. Therefore this site is suitable for development which falls under Class 4 Business of the Use Classes Order. This lists offices (other than Class 2), industry which is not Class 5 and research and development of products or processes as suitable uses, provided that they can be carried on in any residential area without detriment to the amenity of the area due to noise, vibration, smell etc.

As per the SEA site assessment, it is acknowledged that part of this site may be at risk of flooding from a watercourse and a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

GP03 West of existing Business Park

Support for use of the site for business use is noted.

The Main Issues Report stated that retail was not a preferred use of this site as there was recognition of the impact that retail development on the edge of the settlement could have on the centre of Golspie. The importance of the centre of Golspie for serving the wider community and the impact of any retail loss is acknowledged. The Proposed Plan will contain a policy based on the Town Centre First Principle whereby it will be recognised that settlement centres play a key role in serving wider communities.

This site will not be taken forward in the Proposed Plan as an allocation; it could however be a potential longer term site for business use once other existing business sites are developed.

GP04 Mackay House Hostel site

According to records no potentially contaminative sources have been identified onsite.

GP06 Sibell Road

This site is already allocated for housing in the Sutherland Local Plan and has been given planning permission for housing units. Any relevant mitigation that has been identified through the SEA site assessment will be included as developer requirements for the site.

Coastal Erosion

In considering the suitability of sites for development, we undertake Strategic Environmental Assessment which includes coastal erosion considerations. However the Local Development Plan's role whilst important is limited in addressing the issue of coastal erosion. The Council has a Coast Protection Policy Statement which was approved by Community Services Committee in August 2014. It states that general protection of sports or recreational facilities will only be undertaken by the Council in exceptional circumstances. The Council will work in partnership with other agencies and contribute technical advice as well as facilitating funding opportunities.

Other

The following sites will be allocated for development in the Proposed Plan: GP01; GP02; GP04; GP05; GP06; GP07.

The following sites will not be allocated for development in the Proposed Plan: GP03; GP08; GP09; GP10.

Issue 7: Halkirk

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Halkirk	
List of respondents (including customer number):		
Houghton Planning Ltd Hugh Lockhart (2166) John Campbell (5126) Peter Knight (5192) Scottish Natural Heritag SEPA (3115) Transport Scotland (36)	36)	, ,
Summary of the comments received:		
General (5126)		

Halkirk, being the first planned village in Scotland, has been developed with an infrastructure of roads, pavements, lighting, sewage, electricity distribution etc to accommodate large development. Currently, there are still a large number of areas within the current plan and infrastructure covered area that needs to be filled and as such, emphasis should be made to encourage development of these area and as such, not increase the available development ground around the outlying areas of the village.

Placemaking Priorities

(204)

Add the following: Avoid any adverse effect on River Thurso SAC in particular in regard to preferred site HK01 and alternative site HK03

(184)

Respondent agrees that the Plan is an opportunity to address the inconsistent and haphazard nature of development in the village. Supports the Placemaking Priority• of avoiding uncoordinated and fragmented expansion on the fringes of the town, these should be planned through logical and appropriate extension of the settlement.

(184)

Other priories for Halkirk should include: promoting opportunities for redevelopment, infill development and brownfield sites; develop high quality leisure and tourism facilities; and additional housing

HK01

(5126)

Development of this area should be encouraged as the site has planning permission and already commenced development.

(3115)

SEPA note that part of the site may be at risk of flooding from the River Thurso. Developer Requirement for an FRA and that no development should be located in the area shown to be at risk of flooding.

HK03

(5126)

The site is suitable for residential development as it can be divided into two parts (the land between the manse and the cemetery and the land alongside the river bank), it is bounded by walls to the east and west, there are no trees or other significant vegetation, improved access could be established from Crescent Street. Although it is within the existing Halkirk SDA it is noted that it is currently allocated for Amenity use in the local plan. It is also recognised that there may be archaeological considerations due to its proximity to the cemetery and listed building. Development could avoid areas of flood risk. The site is effective as the landowner is willing to release the site for development and, excluding the area alongside the river, it can be easily developed due there are not many physical constraints, such as no contaminated land or ground instability. The non-developable area could also be used to meet the Plan's place making priority of improving access to and along the river. The site is suitable for 5/6 self-build plots and this would be in keeping with the type and character of that on Crescent Street. The area at the rear of the church would be avoided to protect the view of the church from the other side of the river. (3641)

The site should not be allocated for housing as it is currently protected as Amenity land under the Caithness Local Plan in order to preserve visual impact and amenities of the village. There is no justification as to why planning policy can change from PP4 to PP1 as there has been no change in circumstances. The graveyard has been extended twice and it will likely require further expansion in the future. Residential uses are not suitable in such close proximity to graveyards. The site also adjoins the former Halkirk Abbey which is an important heritage feature of the village. Development of the surrounding area would be contradictory to the Plan in safeguarding heritage. The ground level falls below the Halkirk sewage connection pipe which means all waste would need to be dealt with by treatment package (discharging into the river) or septic tank/soakaway systems which need a significant discharge are to operate correctly. The electricity supply to the site might be constrained as the adjoining Abbey House is supplied from across the river on the Braal supply. There are no suitable access points without removing the existing graveyard parking area- which is essential during funerals. There are alternative sites in the village which could be developed instead.

(3115)

SEPA note that part of the site may be at risk of flooding from the River Thurso. Developer Requirement for an FRA and that no development should be located in the area shown to be at risk of flooding.

HK04

(184)

Respondent considers that the reasons for non-preferring HK04 fail to recognise the unique position of the subject land both in terms of its physical context and its commercial opportunity. The Caithness Local Plan (2002) prevented backland development but there have been clear examples of development which has been permitted just outside the SDA that had a good context to the existing settlement pattern. The current SDA line splits the land to the rear of the Ulbster Arms Hotel and it is simply an arbitrary line with no feature on the ground to define it. A more logical boundary for land to the rear of hotel would extend further to the boundary with the Milton Farm fields. This would reflect the settlement boundary to the north and provide continuity with physical features on the ground. The hotel site has been established for over 150 years and additional land is now required to support the growth of the business. Additional high quality commercial/tourism related facilities (focused on catering for fishing and gun sport parties) would bring year round employment opportunities. A greater range of accommodation is required and the hotel has already invested in this over recent years. The hotel has further plans to expand its operations on the site of the existing low guality chalets including additional car parking and amenity area for guests. has a strong environmental ethos with its links with the River Thurso and it is vitally important that the overall composition is sensitively integrated into its setting and landscaped to a high standard with the added benefit of enhancing the local biodiversity. The existing access will be used so no new vehicular access is required to service these proposals

and through the provision of additional on site parking, off site parking will be reduced on Bridge Street and on the access road to the north of the hotel. There are no environmental designations, services are readily available.

HK06

(2166)

The site has no access restrictions as the access point into the site is 7 metres wide which is wider than Bridge Street itself (5.85m from kerb to kerb). Provisions have been made to allow for access to neighbouring properties. The site could be used for affordable housing which a local Councillor highlighted there was a shortage of and the Council's housing list identifies that there is demand of 19 houses in Halkirk.

ADDITIONAL SITES

Halkirk Land W of Bridge Street

(3636)

Small site approximately 3km from A9(T). Closest junction to the A9(T) is via a cross roads, however development is unlikely to have an impact.

(3115)

SEPA note that much of the site is adjacent to Moss of Halkirk which is peaty and likely to contain wetlands. We ask for a Development Requirement that a vegetation survey may be required of the site and surrounding area and the mitigation measures to protect surrounding wetland habitats outlined. Parts of the site may be at risk of flooding from a small watercourse. Developer Requirement for an FRA and that no development should be located in the area shown to be at risk of flooding.

(204)

SNH's advice is that development in this location will likely need to take account of potential for connectivity, via the drain network, to the River Thurso Special Area of Conservation (SAC).

(2166)

Respondent fully supports proposed new site for development, Land West Of Bridge Street Halkirk. There is access to Pollock House Land (Approx 7 meters) which is wider than Bridge Street and there is provision for access to the neighbouring land North & South. As discussed at the CaSPlan consultation event in Halkirk there is a "Desperately serious shortage of housing in Caithness" and last November according to the Highland Council's housing office there was a total demand for 894 mixed sized houses in Caithness.

(5023)

Objects to the allocation of the land west of Bridge St, Halkirk as the respondents states that they bought in 2010 due mainly to the property having the beautiful uninterrupted views. The property is rented out and the visitors often mention the views. The current tenants are opposed to development and they may terminate their tenancy if development was to go ahead.

(5192)

Respondent does not understand the plan for Land West of Bridge Street as he had already submitted is client's land and Mr Mackay's land as a Call for Sites suggestion for housing development. Questions whether CaSPlan is suggesting that the ones outline in red are new as he understood that the land outlined in blue (Ulbster Arms) had already been included in the previous Plan.

During the CaSPIan "workshop" it was raised that there was the possibility that a new road might be introduced from the Milton Farm Road to the West of the area outlined red on your map to allow any further development. Respondent considers this a "non-Starter" as the owner of Milton Farm is not interested in releasing land and if development extended further west it would be detrimental to the working farm.

Respondent adds that suggestions in CaSPlan of extending the grid iron pattern within the area outlined red, or beyond does not "ring true" with the original, "Planned village".

With careful planning & design, housing development within the area outlined red would be of no detriment to the village, and as you have already approved a number of sites in this area & have others (Ulbster Areas) recently in place, then I do believe that both of my clients proposals are perfectly acceptable.

Halkirk Land SW of Ulbster Arms Hotel

(3636)

Small site approximately 2.75km from A9(T). Depending on proposed development scale, a TA may be required to assess the impact of the proposal on the A9(T) junction as the closest junction to the A9(T) is via a cross roads.

(3115)

SEPA note that parts of the site may be at risk of flooding from the River Thurso and a small watercourse. Developer Requirement for an FRA and that no development should be located in the area shown to be at risk of flooding.

(204)

SNH's advice is that development in this location will likely need to take account of potential for connectivity, via the drain network, to the River Thurso Special Area of Conservation (SAC).

Interim position agreed by Area Committee:

Although Halkirk has experienced relatively high levels of housing development since the existing local plan was adopted only a few new sites were suggested to us for inclusion in CaSPlan. HK03 is a sensitive site due to the adjoining cultural and natural heritage. We have noted the Council's the request that the site be reserved for future expansion of the existing cemetery and together with the need for better links to the riverfront it is recommended that HK03 be allocated for Community uses.

The three sites west of Bridge Street which are shown in the MIR map were non-preferred as it would lead to uncoordinated development of the backland areas. Since the MIR was published a larger development site has been considered which extends from Milton Farm road down towards the junction with Camilla Street. Although not all landowners will want their land allocated it will allow the Council greater control over any development and ensures the delivery of infrastructure such as shared access points. We recommend a Business allocation on land behind the Ulbster Arms Hotel to support further rationalisation and expansion of the business and a Housing allocation for the remainder of the area.

It is recommended that HK01 and HK02 are taken forward in the Plan for the uses outlined in the MIR. There are also a number of small infill opportunities which are not being specifically allocated in the Plan.

Recommended Council Response:

As per interim position outlined above, with the following additional comments:

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Caithness Local Plan will be carried forward.

Strategy

Following SNH's request we have added reference to avoiding adverse impacts on the River Thurso SAC.

Emac Planning suggests additional place making priorities. Promoting infill opportunities is

already a priority. We are also allocating the main brownfield site in the village (HK02) and we support, in principle, the redevelopment of brownfield sites. Improving the tourism industry forms part of the CaSPlan strategy and we are supportive, again in principle, of tourism related development on land behind Ulbster Arms Hotel.

<u>HK01</u>

Support for HK01 is noted. A requirement will be added for a flood risk assessment to be carried out that may affect developable land.

<u>HK03</u>

The site was presented as an Alterative in the MIR because it was one of the few sites suggested to us during the Call for Sites exercise. As there has been a significant amount of development in the village over the past 10 years we looked at all options including changing it from Amenity land to Housing. However, the request to allocate part of it for the expansion of the cemetery and the inclusion of a new larger site on land west of Bridge Street now removes the need to allocate HK03 for housing.

A requirement will be added to the Community allocation for a flood risk assessment to be carried out that may affect developable land.

Additional Site - Land West of Bridge Street (HK05/HK06)

There has also been a relatively high level of housing development in the village over the past 10 years. As a result we need to identify a suitable range of housing options for the future growth of the village.

The land west of Bridge Street offers a reasonable direction for the village to grow but it appears to have been resisted due to the problems with uncoordinated, adhoc development. Nevertheless we recognise the pressure for backland development and that some applications in the area have been granted consent since the existing local plan was adopted.

Since the MIR was published we have discussed with several landowners the potential to allocate a larger area. It was agreed that a larger allocation would be acceptable and that it would allow the Council to manage future development in a better. This would include ensuring that access constraints are addressed through Developer Requirements for shared access and prohibiting ransom strips. On the advice of SEPA we also intend to include Developer Requirements for a Vegetation Survey and a Flood Risk Assessment to be carried out.

Issues such as impacts on an individual's view are not material considerations in the planning system. The impact on existing residents' amenity would be assessed as part of the planning application process.

Additional Site - Land SW of Ulbster Arms Hotel (HK04)

We are supportive in principle of the proposals set out by the Ulbster Arms Hotel for expanding and improving the hotel accommodation and other associated land uses behind the hotel. This reflects the Plan's Employment Outcome and helps to strengthen the tourist industry in the area. SEPA have flagged up the potential risk of flooding from the River Thurso and as such a Developer Requirement for the Flood Risk Assessment to be carried out will be added.

A developer contribution has been added that development must take account of potential connectivity, via the drain network, to the River Thurso SAC.

Issue 7: Helmsdale

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Helmsdale	
List of respondents (including customer number):		
Highland Council CPAM Team (3727) Scottish Natural Heritage (204) John Cormack (2106) SEPA (3115) Transport Scotland (4616) Paul Mitchinson (5198) Kathy Mitchinson (5198)		
Summary of the comments received:		
General		

General

Report should carry over mitigation identified in SEA Environmental Report (204)

All streets are not identified *on map* and *sites* are not identified in clockwise order (italicised is assumed) (2106)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage (3115)

Settlement includes several preferred sites next to the trunk roads (A9, A99), further discussion is invited on the access strategies and any potential impacts (4616)

HD04

Site preference and proposed use supported (3727)

Part of the site is at risk of flooding from the River Helmsdale and the sea. Developer Requirement for (1) FRA required to support development, (2) harbour related uses only within the area shown to be at risk of flooding (3115)

HD05

This site could be made 'non-preferred' rather than 'alternative', given that the Sutherland Housing Landscape Capacity Study (2006) identifies this within an area unlikely to be suitable for development due to value of scenic resource (Map 57). In addition the SHLCS notes this area as having high potential for environmental enhancement to improve the visual resource. It is a prominent site sitting on top of a raised beach, with local value for open space and informal recreation (204)

ADDITIONAL SITES HD05

Customer objects to site because:

It is used for informal recreation by the local community

Road infrastructure is not suitable to support additional traffic

Suggest a previous application was refused for the site

Impacts on the visual amenity and settlement setting

Potential for impacts on tourism by detracting from the settlement setting (5198)

Suggest developer requirements from Sutherland Local Plan to ensure setback from seaward edge and safeguard scenic qualities of raised beach feature. Existing informal path network should be maintained and enhanced where reasonably possible (204)

Interim position agreed by Area Committee:

The strategy for Helmsdale focused on carrying forward sites from the Sutherland Local Plan that help contribute towards the settlement's advantageous strategic location on the A9 and Far North Railway Line. Through the MIR consultation, key issues emerged about safeguarding amenity and landscape assets, and ensuring availability of sufficient housing, business and industrial land. Site HD03 is being developed at a lower density than originally planned, therefore there is a need for other housing sites. Site HD05 is recommended for inclusion in the Proposed Plan, incorporating the eastern extension suggested through MIR consultation, and included in the Additional Sites consultation. It is recommended that site HD02 be changed from 'Industrial Use' to 'Business and Industry' to offer further flexibility of uses for the site.

Recommended Proposed Plan content:

As per interim position outlined above, subject to the following:

General

Where appropriate, mitigation identified through the SEA Environmental Report is carried through to the Proposed Plan as developer requirements for sites and as Placemaking Priorities.

HD02

Site is retained as an industrial allocation, but this does not prevent business uses being proposed on the site, which could be supported- a Glossary item is included to clarify this.

Issue 7: Lairg

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Lairg	
List of respondents (including customer number):		
Highland Council - CPA SNH (204) A&H Gordon (4942) Jan Thomson-Fraser (4 Altnaharra Estate Ltd (4 John Cormack (2106) Scottish Environment P Trevor Black Architects	712) 579)	
Summary of the comments received:		
General		

Mitigation set out in development factors and developer requirements for allocations in the current Sutherland Local Plan should be carried forward as appropriate. This should be augmented as necessary by the mitigation identified in the SEA Environmental Report, including mitigation identified in SNH's response to the Environmental Report. (204)

The area is lacking employment opportunities, there is little or no transport infrastructure to get people to jobs and the housing stock is in decline. CaSPlan means nothing to the area unless the local economy improves, with employers attracted to the area; houses will not be needed if there are no jobs. Windfarms being approved locally is also an issue. (4712)

All areas should be encouraged to develop rather than just concentrating development on the east coast. Lairg should have more of a central role in Sutherland for example it should have a nursing home/community facility. (4579)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage. (3115)

Placemaking Priorities

Add "Avoid any adverse effect on River Oykel SAC". (204)

LA01 Old Sutherland Arms Site

Part of the site may be at risk from Little Loch Shin. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

Note that site has been shown as Mixed Use (retail, tourism, community, housing) and welcome this. Concerned about how the term mixed use might be interpreted. It is our understanding that it is intended to mean that a development of any one or more of the named uses would be considered appropriate and that it is not intended to require a development of more than one. The Plan should make this explicitly clear. (5194)

The site is subject to a TPO and is referred to in the Environmental Report with recommended mitigation "Ensure any development does not affect TPOs. Retain as many trees as possible". Application of the TPO in this manner will be hugely detrimental to any potential development of the site as it has since the TPO was established in 2007. We believe it is now time for the TPO to be reviewed and removed. The TPO was established by committee during consideration of application 06/00405/OUTSU. The TPO is unnecessary and there has been no threat to remove

trees. If there was no TPO the Planning Authority still have effective control of any proposals to remove trees. The effect of the TPO is to sterilise the site for development. It has made development of the proposed hotel in 06/00405/OUTSU impossible. CaSPlan acknowledges the importance of the site to Lairg. If the TPO cannot be removed then the wording of the plan should be amended to ensure the TPO does not take precedence over any reasonable development of the site. (5194)

LA02 Southwest of Ord Place

Much of the site is undisturbed peat therefore add the following developer requirements: Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site; Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed. (3115)

LA03 Northwest of Ferrycroft

A large part of this site may be at risk of flooding from Little Loch Shin. Add the following developer requirements: recreational or community use which allows it to stay as open space; and a Flood Risk Assessment may be required to inform layout and design of development. The Environmental Report identifies that peat is present on the site but that it is not thought that the type of development proposed would have an effect. We would suggest that even relatively low-key developments (for proposals such as building new paths, toilets, playing fields or small buildings) could have an effect on both peat and wetlands. As a result we ask for a Developer Requirement to cover: Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site; Vegetation survey to demonstrate how impacts on wetlands have been avoided, or if necessary, mitigated. It should also be noted in the text that these issues may affect the area of the site which can be developed. The site is dissected by a number of small watercourses and large drains. Depending on proposals for the site there may be opportunity to restore these features to a more natural form. (3115)

LA04 Former Laundry

Supports allocation of this land for a mix of business and housing as it gives flexibility to future developments and improvements to land and buildings. (3627)

Supports mixed use to include business development. (4942)

Part of the site is at risk of flooding from a watercourse. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

LA07 Southwest of Main Street

Part of the site is at risk of flooding from a watercourse. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

LA08 Southwest of Main Street

Part of the site may be at risk from Little Loch Shin. Add a developer requirement for a Flood Risk Assessment and no new development should be located in the area shown to be at risk of flooding. (3115)

LA10 East of Manse Road

There is a possibility that this site is on peat and may contain wetland habitats therefore ask for the following developer requirements: Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site; Vegetation survey to demonstrate how impacts on wetlands have been avoided, or if necessary, mitigated. It should also be noted in the text that these issues may affect the area of the site which can be developed. (3115)

Interim position agreed by Area Committee:

There was an over-supply of housing land in Lairg and this influenced the MIR strategy to consolidate development around the central area. It is therefore recommended that the preferred sites identified in the MIR are carried forward to the Proposed Plan. It is also recommended that the non-preferred sites LA11 and LA12 and the alternative sites LA08, LA09 and LA10 do not go into the Proposed Plan as allocations.

Recommended Council Response:

As per interim position outlined above, subject to the following:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Sutherland Local Plan will be carried forward.

Placemaking Priorities

We will add "Avoid any adverse effect on River Oykel SAC" to the placemaking priorities.

LA01 Old Sutherland Arms Site

As per the SEA site assessment, a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

Support is noted for showing the site as Mixed Use. In response to concerns about how the term 'mixed use' might be interpreted, the Proposed Plan will explain that as a general rule not all of the uses listed as suitable for the mixed use site have to form part of proposals subsequently brought forward for the site. Any uses that must be included in any particular site will be explicitly stated in the Proposed Plan.

The TPO was served in recognition of the importance of the mature trees within the centre of Lairg and the contribution they could make to the setting of any re-development of the site. The Council would only be prepared to review the TPO if a new tree survey was undertaken which showed that the condition of the trees had changed. If considered appropriate the TPO could then be reserved with certain amendments.

LA02 Southwest of Ord Place

As per the SEA site assessment the following developer requirements will be added: Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site; Vegetation survey to demonstrate how impacts on wetlands have been avoided. It will also be noted in the text for the site that these issues may affect the area of the site which can be developed.

LA03 Northwest of Ferrycroft

The site will be allocated in the Proposed Plan for Community (recreational) use. The following developer requirements will be added: A Flood Risk Assessment may be required to inform layout and design of development; Peat Management Plan to show how disturbance of peat has been minimised and how peat will be managed on site; vegetation survey to demonstrate how impacts on wetlands have been avoided or if necessary, mitigated. The text for the site will note that these issues may affect the area of the site which can be developed. A developer requirement will also be added that encourages restoring small watercourses on the site to their more natural form.

LA04 Former Laundry

Support for mixed use (housing/business) noted.

As per the SEA site assessment it is noted that part of the site is at risk of flooding from a watercourse and a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

LA07 Southwest of Main Street

As per the SEA site assessment it is noted that part of the site is at risk of flooding from a watercourse and a developer requirement will be added: "Flood Risk Assessment required and no new development should be located in areas shown to be at risk of flooding".

LA08 Southwest of Main Street

As per the SEA site assessment it is noted that part of the site is at risk of flooding from Little Loch Shin. This site was shown as an alternative site in the Main Issues Report but as additional land for housing is not required, this site is not being carried forward into the Proposed Plan as an allocation.

LA10 East of Manse Road

It is noted that there is a possibility that this site is on peat and may contain wetland habitats. This site was shown as an alternative site in the Main Issues Report but as additional land for housing is not required, this site is not being carried forward into the Proposed Plan as an allocation.

Other

The following sites will be allocated for development in the Proposed Plan: LA01; LA02; LA03; LA04; LA05; LA06; LA07.

The following sites will not be allocated for development in the Proposed Plan: LA08; LA09; LA10; LA11; LA12.

Issue 7: Lochinver

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future	
MIR reference:	Question 7: Lochinver	
List of respondents (in	ncluding customer number):	
Alexander Macleod (469 Graham Dougall (4838) Scottish Natural Heritag Assynt Tourism Group (Urban Animation – Ager Bill Badger (5021) Culag Community Wood Culag Community Wood John Cormack (2106) SEPA (3115)	ne (204) (4938) nt (400)	
Summary of the comm	ients received:	
General Site preferences and pla	acemaking priorities supported (4690)	
Report should carry over mitigation identified in SEA Environmental Report (204)		
Area suggested as having "UNESCO status as a most unique area of outstanding beauty" (4938)		
Lochinver needs develo improvement (5063)	pment; low-cost accommodation and jobs. Welcome any attempts at	
All streets are not identif assumed) (2106)	fied on map and sites are not identified in clockwise order (italicised	
waste water drainage (T	include a clear statement requiring all allocations to connect to public The only exception to this could be allocation LV07 in Lochinver, identified "unique tourism and community uses that are sensitive to woodland	
LV01 Road safety concerns w enable safer access to s	vere raised over access to site. Customer offering to sell their property to site (4838)	
Site could extend in low-lying area of the valley. Development of site should not stymie future expansion to north (4938)		
Part of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding. We consider that this site is likely to be peatland and contain wetland habitats. Additional Developer Requirement for (1) Peat management plan showing how disturbance of peat has been minimised and how peat will be managed on site, and (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided, or if necessary, mitigated (3115)		
LV02 Supports site preference site onto 'ground beyond	e and states development has commenced- highlights potential to extend d' (400)	

Include Developer Requirement for (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site, and (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed (3115)

Mitigation in the Sutherland Local Plan and CaSPlan SEA Environmental Report should be taken across into the Proposed Plan, e.g. the need for a design statement to be considered in consultation with SNH (204)

LV03

This site is an undulating, rocky and part-wooded landscape area that currently acts as a transition to the wilder landscapes to the east which are now identified as a Wild Land Area. Any development in this area would need to be low density and extremely sensitively sited not only to respond to the variations in landform, soil/drainage and woodland, but also to ensure that they do not detract from the current remote and undeveloped qualities that are appreciated in this area. The rationale of the site boundary is unclear, as it doesn't seem to correspond to the land pattern, and in particular the SE part appears to go onto higher rugged ground. If this site is to be maintained in the Proposed Plan, mindful that this is within an NSA, we strongly advise it should be limited to a narrower western section along the Canisp Road, with housing being low density, sensitively sited and with a high quality of design, minimising the loss of woodland. The SE part of the site further from the road and on more difficult terrain should be removed (204)

Support site preference (4938)

Does not support site preference as 'against principles of conservation' (5021)

Include Developer Requirement for (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed. Part of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding (3115)

LV04

Part of the site may be at risk of flooding from the sea. Developer Requirement for (1) FRA and no business development to be located in any areas shown to be at risk of flooding, and (2) harbour related uses may be acceptable in areas at risk of flooding (3115)

LV05

Part of the site may be at risk of coastal flooding. Developer Requirement for (1) FRA and no business development to be located in any areas shown to be at risk of flooding, and (2) harbour related uses may be acceptable in areas at risk of flooding (3115)

LV07

This woodland area is included in the Ancient Woodland Inventory (Type 2b - long established, of plantation origin). Great care will therefore be needed that community/tourism 'woodland huts' development here does not significantly diminish the woodland characteristics and the contribution that the woodland makes to the setting of Lochinver. Any tree removal should be subject to the Policy on Control of Woodland Removal (e.g. compensatory planting). Species surveys and protection plans if necessary should be a development factor here (204)

Support site preference, and suggest extension of site boundary (5064)

We consider that this site is likely to be peatland and contain wetland habitats. Developer Requirement for (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site, and (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided, or if necessary, mitigated. It should also be noted in the text that these issues may affect the area of the site which can be developed. Small parts of the site may be at risk of flooding from small watercourses. Developer Requirement that an FRA may be required for development proposed in the vicinity of watercourses (3115)

LV08

Supports inclusion of LV08 for development and cites ongoing feasibility work for site, and suggests extensions of site to include land to SW (former garden areas). Notes that if site is not included or retained within SDA, no further feasibility work will proceed (400)

Include Developer Requirement for (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed. Part of the site may be at risk of flooding from the sea. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding (3115)

LV09

We welcome this large site being classed as non-preferred, given its potential impact on the qualities of the Assynt-Coigach NSA (e.g. 'extensive cnocan landscapes' (204)

ADDITIONAL SITES

LV02

Site believed to be on peat and wetland habitat. Developer requirements should include peat management plan and vegetation survey, both of which may restrict scope and extent of development; this should be included in the site text. (3115)

Customer highlights previous objection to site in 2009 Sutherland Local Plan, which was for a smaller area and number of houses (10 units). Any development should be subject to careful siting taking account of landform and setting, restricted to 1 ½ storey height, and supported by a design statement. (204)

Customer supports site for housing. States that access is possible from existing allocated area and that there is limited peat onsite. States that site is reasonably well screened and development would sit beneath the ridgeline, limiting visual impacts. Customer also states that development could be in keeping with the existing built form and the site is the best opportunity for securing effective land supply in the settlement. Any development on site should not stymie further expansion of the site. (400)

Interim position agreed by Area Committee:

The unmet demand for affordable housing in Lochinver was a key driver to ensure a range of options for housing. The highly sensitive landscape setting was highlighted. An extension to site LV02 was proposed and consulted on through the Additional Sites Consultation, but it is recommended that this site be retained without extension due to its visually sensitive location. Site LV03 was suggested to offer further housing options, but its original extent was unlikely to be developable due to presence of surface water and complex topography. A revised boundary for LV03 is therefore recommended.

Recommended Council response:

As per interim position outlined above, subject to the following:

General

Mitigation identified through the SEA Environmental Report is carried through to the Proposed Plan as developer requirements for sites and as Placemaking Priorities.

LV07

Site boundary has been extended to show the full extent of Culag Community Woodland area.

LV08

Site is not included as an allocation and Settlement Development Area boundary is amended to reflect where appropriate infill development on non-allocated land could and could not occur.

Issue 7: Lybster

Issue 7: Lybster			
MIR Issue	What should the settlement the future	nts in Caithness & Su	therland be like in
MIR reference:	Question 7: Lybster		
List of respondents (ir	cluding customer number)	:	
Alison Kirk (4711) Andrew Gunn (3621) Caithness Horizons (20 Lydia Popowich (4728) Melanie Spirit (4837) Roy Lambert (4681) Scottish Natural Heritag Transport Scotland (461	e (204) 6)		
Summary of the comm	ents received:		
General "no mention of what p internet services" (4711) Need to attract and reta		blic transport and upda	ting telephone and
	sing stock is poor (3621)		
	ive site options for developm	ent (3621)	
	es, no jobs and poor transpo		a long time to sell"
	eral preferred sites next to th strategies and any potential i), further discussions
The introduction should waste water drainage (3	include a clear statement rec 115)	uiring all allocations to	connect to public
Placemaking priorities Add to Placemaking Prio (204)	prities: "Avoid any adverse ef	fect on East Caithness	Cliffs SAC and SPA"
LY02 (Assumed customer refe (4711)	erring to this site) Does not su	ipport development bel	nind their property
LY03 Development would impact on setting of hotel (2014)			
Concerns raised over future of existing houses onsite, particularly in relation to flooding and drainage (4681; 4728) (customers refer to LY10, but assume they actually mean LY03- the preferred site)			
	d within East Caithness Cliffs elcome it being classed as "n		unbeath to S. gaps

Other sites

Previous local plan included sites adjacent to A99 (10a in CLP2002), these are omitted (3621)

Interim position agreed by Area Committee:

There was an over-supply of housing land in Lybster and this influenced the MIR strategy to consolidate development and reflect the existing built form of the settlement and safeguard key assets like the harbour. It is therefore recommended that the sites identified in the MIR be carried forward into the Proposed Plan, and that issues raised from the consultation be addressed through developer requirements.

Recommended Council response:

As per interim position outlined above, subject to the following:

General

The Proposed Plan includes further explanation of the planning context in Lybster that addresses concerns raised. Mitigation identified through the SEA Environmental Report is carried through to the Plan as developer requirements for sites.

LY02

Include site as shown in MIR. This is part of an existing allocation from the CLP 2002, and forms a key component of the placemaking priority to consolidate the built form of the settlement, it also offers a good option for delivering an effective housing site.

LY03

Include site as shown in MIR. This is part of an existing allocation from the CLP 2002. By including appropriate developer requirements identified through the SEA Environmental Report, this site will contribute to consolidating the built form of the settlement and will provide an effective site. Developer requirements safeguard the setting of the listed buildings and capitalise on placemaking opportunity of the 'gateway' location of the site.

Other sites

Sites identified in the CLP 2002 north of A99 identified townscape assets, these are highlighted in the introductory text for the settlement.

Issue 7: Thurso

Issue 7: Thurso		
MIR Issue	What should the settlements in Caithness & Su the future	therland be like in
MIR reference:	Question 7:	
List of respondents (in	cluding customer number):	
Lyndall Leet (3672), Ber Peter Wade (4700), And (4794), Brian Malley (47 Paterson (2032), Jamie Manson (4766), Eileen M Lennie (4745), Kelly Dor (4840), Liz Wassall (483 (4899), John Barkham (4 (4895), SNH (204), Caitt Kenneth Nicol (4944), K Brian Jonhston (2073), Arrowhead (4934), Scot Taylor (2016), Thurso C Paterson (3304), Michae Donald Robson (5078), (4955), David and Laffer Miller (3602), Fiona Doc (4977), Marjory Lord (49 (4763), Jean Alexander Catherine Stewart (5095 Cllr Willie Mackay (1902) Christie (5022), Shelia F O'Hagan (5043), Daniel Galbraith)(3595), Susan Arrowsmith (5059), Alan (5129), Victoria Mackay (5103), Network Rail (49 (2106), Janice Grant (51 Parker (4739), Laura Fa (5210), Hilary Brown (52 Jane Hamilton (5216), D (5220), Nicolas Doherty (5227), Thurso United F Caithness Gymnastics (riles Angus (4701), (2161), Garry Calder Baker (4787), Colin s (4767), Adrian ares (4755), Sharon 768), Stuart Andrew anda Paterson Jordan MacLean rbara Gilmour (3601), erine Murray (3640), alker (3658), Gill (5069), Raymond s (2048), Carol obertson (5077), 79), Paula Coghill ckay (5081), Isobel 651), David Lord an Marie Mackay aire Cairns (5096), am Stewart (5090), Reid (5066), Janetta 5041), Morna arristie (CKD h (4934), John vie (4984), Gail Brown , Jacqueline Ridgley , John Cormack 5094), Caithness PA (3115), Gary Firth Yacht Club David Orr (4756), Swimming Club arajane Mcginley Coghill (5232),), Sophie Dunnet

Summary of the comments received

Vision and Strategy for Thurso

(2032, 4745, 4840, 5091)

Supportive of the preferred vision and strategy for Thurso outlined in CaSPlan

(119)

Pleased that the outputs of the charrette are largely reflected in the MIR. The exception is the enhancements and public participation along the river edge from Loch More to Thurso East. This should be promoted in CaSPIan as it is important resource which would not be excessively

expensive to finance, would attract a variety of sourcing funds and could commence relatively quickly.

(2031)

Connectivity and transport remains a high priority for the area for community growth, developing the tourist industry and improving employment opportunities. Partnership working between the relevant bodies is required to deliver this.

(4765)

To keep the town fresh and focused there needs to be new jobs and new developments

(4686, 3650, 5130)

Supports the priority on focusing development towards brownfield sites. Any existing brown field sites should be developed before the town is allowed to expand into the countryside.

(2016)

Enabling Development and Attracting Investment should be key themes for the new strategy for Thurso. The town competes with other towns and areas where investment can deliver. The LDP needs to be a catalyst for attracting and enabling investment and connectivity.

General Issues

(5129)

Concerned that despite the amount of housing land identified that there are no sites identified for educational uses. Many of the sites in Thurso West would fall within the Pennyland school catchment but there is no provision for new educational facilities.

(3672)

Respondent unsure what the annotation 'mixed use expansion with key greenspace enhanced' means and is concerned this would result 'random development'.

(3672)

Areas around Thurso River should not be built on due to climate change and rising sea levels. The mouth of Thurso River floods now when a high tide from the sea meets the river in full spate and can extend as far as the British Legion. The exception to this would be areas TS08 and /TS11 where the ground levels are higher.

(3672)

Respondent suggests shrubs should be planted instead of trees as they are less likely to be cut down if they start to obstruct people's views from their houses.

(3672)

All areas to the west of Thurso shown in green are on heavy clay pan below the topsoil which does not percolate and ponding can occur in wet winter weather in low lying areas.

(3672)

There is a lack of sporting facilities in the area.

(4701)

The annotation 'Mountvernon' on the map it is in fact Oldfield, as the housing site on the opposite side of the road is the only area known as Mount Vernon (respondent used to own that land before the council acquired it by compulsory purchase in 1962).

(2016)

Consideration of phasing housing land is required.

(4898)

Economic development funding has failed to diversify the economy (except for tourism) and this

funding will cease due to the problems in other EU countries.

Place Making Priorities

(204)

Add to Placemaking Priorities "Avoid any adverse effect on River Thurso SAC and SSSI" (in particular in regard to TS10, TS12 and TS13)

(4931)

Objects to the Plan identifying land for a new supermarket as it contradicts a number of strategic objectives in CaSPlan and national policy. Although SPP aims to promote business, a new supermarket would damage businesses as shoppers would be drawn away from the town centre and footfall would decline. Supermarkets cater for all consumers and local businesses cannot compete. This would contradict the aim of creating a more diverse economy (section 3.2). To improve the tourist market in the area local businesses should be supported and the town centre regenerated as this is what gives a place character. A supermarket would reduce the appeal of the area which is not dominated by national chain stores like other areas.

Housing Demand/Supply

(3629, 3603, 3658, 3678, 4948, 4944, 4798, 4898, 4899, 5076, 5092, 5090, 3608, 5103, 5094) There is no demand for additional houses in Thurso or Caithness. The issues/reasons raised include:

There are a large number of existing empty houses already on the market and efforts should be made to best utilise them before developing on greenfield land.

The economy is expected to decline due to the decommissioning of Dounreay and Vulcan facilities. The main reason for new housing at the last Local Plan review was the growth in employment resulting from the decommissioning of Dounreay. This work has now peaked and is in decline.

There is a declining and an ageing population and young people are moving away.

The marine renewables industry will not provide enough jobs to make a significant change. The marine renewables industry is progressing at a much slower rate than anticipated, e.g. Several wave/tidal companies going into administration.

The fall in oil prices will have a negative impact on the oil and gas industry.

Expected decrease in school roles in Thurso.

The need for future housing in Thurso has been overestimated and is based on seriously out of date information (the current HNDA).

Council Ward Information shows that there has been low numbers of new housing built in the last 5 years and the current stock is adequate.

The background studies to the MIR show that the population of Caithness is in decline and there a surplus of low cost housing in Caithness.

There is already land with planning permission for 400 houses at TS04.

(5091)

Respondent would welcome 400 houses built in the town as that would mean there is demand for them

(4948)

If too many housing sites are identified it could result in several half built housing estates. Existing housing allocations should be built first.

(4934)

'Thurso needs housing'

(4739)

If the population continues to fall then there will be an increase in empty properties both commercial and residential.

Bypass

(4616)

Transport Scotland note that the safeguarding of land for a bypass was included within the Caithness Local Plan adopted in 2002. Scottish Planning Policy states in paragraph 275; "Development plans should identify any required new transport infrastructure or public transport services, including cycle and pedestrian routes, trunk road and rail infrastructure...Plans and associated documents, such as supplementary guidance and the action programme, should indicate how new infrastructure or services are to be delivered and phased, and how and by whom any developer contributions will be made. These should be prepared in consultation with all of the parties responsible for approving and delivering the infrastructure." Additionally, SPP 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 achieved." Currently, Transport Scotland has no plans to fund or deliver a bypass of Thurso, which would connect with the A9 trunk road. The Government's priorities for infrastructure are outlined within the newly updated Progress Report (2013) of the Infrastructure Investment Plan (2011). Any works proposed to the trunk road network will require consultation with and approval from Transport Scotland. The rationale for a bypass should be clearly established through a robust multi modal appraisal exercise. This type of appraisal would assess all modes of travel as part of an objective led approach. The identification of transport interventions should result from the assessment of evidence based transport problems and opportunities of a specific area. A range of transport alternatives should be considered and not focussed on a particular solution. This should be clearly referenced within the plan to ensure developers and other stakeholders are aware of the work required. It is recommended that the Proposed Plan does not include an indicative line or safeguard land for a bypass until such time that the results of an appropriate assessment are known. This is a position that is reiterated to Local Authorities in the preparation of their development plans where such large schemes are proposed without the undertaking of an assessment to determine a scheme's rationale, viability and deliverability.

(4697)

Ensure the proposed bypass route is kept free from development.

(4701)

The south entrance of the proposed bypass route should be at least 300+ metres further south along the A9. This is for road safety purposes, which at present is far to near the sharp corner and the main entrance into the cemetery.

(4700)

Supportive of the proposed new route of the bypass which takes it to the west of the Business Park.

(4898)

There is not a strong case for the bypass due to the decommissioning of Dounreay being almost complete as harbour traffic and railway users will continue to use alternative routes.

(4898)

A bypass will damage the regeneration efforts of Thurso town centre and the existing tourist businesses due to declining footfall numbers and visitors bypassing the town and head straight for Orkney. Benefits from water sports to Thurso would decrease as visitors would not necessarily visit existing businesses.

(4898)

The extension of Provost Cormack Drive is an unsuitable site for a town bypass. The head of the road is elevated with a steep decline on both sides. This will create a blind summit facing almost due south and into the sun at midday. There are two access roads immediately after the blind summit on the south side. The first of these is to John Kennedy Drive and the second a very busy single access route to the whole of High Ormlie

(2031)

Thurso Community Council welcome the continued recognition of the potential bypass route to the west of Thurso and believe a decision on this route should be firmed up within three years of the development plan being approved

TS01/TS02/TS03

(4944, 3666, 4798, 3658, 2016, 5076, 5090, 2031 - Thurso Community Council)

Supportive of all three business and industrial sites for future marine renewables uses. Related issues raised include:

The need for suitable screening to minimise the visual impact from TS05, the potential bypass and any impacts on tourism.

Coastal areas need protected from inappropriate development.

Concerned that significant growth in renewables industry to be up to 20 years away. Cannot rely on renewables or oil/gas industry.

TS03 would be suitable for longer term expansion if required.

(3115)

SEPA note that parts of TS01 may be at risk of flooding from the small watercourses which run down the perimeter of the site. Development Requirement that an FRA may be required and that no development should be located in any areas shown to be at risk of flooding.

(3115)

SEPA state that part of TS03 may be at risk of flooding from the Burnside Burn which has been straightened. Developer Requirements for (1) measures to be taken to naturalise the course of the watercourse through the site, and (2) FRA and no development to be located in any areas shown to be at risk of flooding after any watercourse improvement works.

TS01/TS03

(4700)

There is sufficient business and industrial land already established including at Janetstown Industrial Estate and Thurso Business Park. These should be the priority for future investment as there is a need to encourage reuse of brownfield/vacant employment sites. The existing employment sites are not being protected for employment generating uses for example a church and a whisky storage facility have been approved for the Business Park.

on TS02

(3603)

TS02 should be regenerated to attract more tourists, oil companies, and the marine renewables sector in order to create more jobs

(3116)

SEPA state that much of this site is at risk of flooding from the coast. Developer Requirement for (1) harbour related development only and (2) FRA to inform layout and design.

TS07 – Thurso Harbour

(3672)

Objects to any development on the site as it is claimed the land is unstable and at risk of stormy weather.

(3672, 3681)

Surfing facilities are better located to the east of Thurso Beach (next to canoe club) as this is where the best surf is and the existing access is poor. It is a disgrace that there are not facilities for surfers as it would bring additional business to the town

(2031)

Thurso Community Council supportive of Community uses (recreation only) on TS07.

(3627, 3603, 4944, 4895, 2016, 5092) Supportive of Community allocation at TS07. Relevant issues raised include:

Increased popularity of surfing and so as future generations have a chance to take part in this sport.

Changing facilities and training are needed.

Development of TS07 (along with TS12 and TS13) would greatly improve the appearance of the river front.

Whilst community/amenity use is the prime use here, consideration could be given to Tourism related uses which could complement the harbour/beach areas. It would help provide attractions in Thurso for tourists on their way to Orkney.

Concern over a large/broad brush Community allocation which might stifle future plans of the existing businesses at the harbour site.

(3116)

SEPA state that part of TS07 is at risk of flooding from the sea. Developer Requirement (1) that site be used for water related activities only, and (2) FRA required to inform layout and design.

TS08 – Former Mart Site

(3603, 4895, 4898, 4944, 2031, 5092 - Thurso Community Council)

Supportive of a range of uses to encourage redevelopment of the site. Reasons given include:

The site is an eyesore in the town and for visitors arriving by train.

It is central to the town and could provide land for businesses relocating from TS12 and TS13.

Tesco should be either forced to build or sell the site.

(4898)

Supportive of tourist/leisure uses such as café/tourist information/sports facilities on TS08.

(2016)

Objects to the site being allocated for a supermarket as it is not fit for purpose. At the public enquiry the best design concept shown included a 15 step public access option from Ormlie Road. Not suitable for high volumes of traffic as it is already on a busy road, surrounded by schools and used regularly by hundreds of children. There may already be a problem with CO2 emissions and further development may lead to dangerous levels of pollution. Supports community, business and community uses (e.g. extra parking for the High School).

(4974)

Network Rail note that part of the site should be allocated for car parking for railway users.

TS09

(4944, 2016, 5092, 2031 - Thurso Community Council) Supportive of proposed Community uses, particularly a running track.

(3603)

Supports the Community use and feels that the site should be developed for sports uses including as a running track as the current track is not long enough for 400m events. It would also be used by sporting groups including the North Highland Harriers. It should include changing facilities.

(5111)

Questions the reasons for only half of Viewfirth Park being included within the MIR. Requests that the whole site is allocated for community uses.

(3672)

This site should be kept for a new school as there are structural issues with Miller Academy and Mountpleasant schools.

TS10

(3603)

The site is an eyesore in the town and is in need of regeneration. It could be used for sporting facilities as it is close to existing sports facilities. It is important, however, to protect the appearance of the riverside.

(5092)

Supportive of preferred uses.

(3666)

Supportive of the allocation but any development would need to be sympathetic of the mill itself.

(4944)

Supportive of community and tourism uses only.

(2016)

A great building, site and location for small volume usage.

(2031)

Thurso Community Council supportive of Housing, Business, Community, Retail and Tourism uses on TS10.

(2106)

Questions whether the site is Listed.

(3116)

SEPA state that part of TS10 may be at risk of flooding from the River Thurso. Developer Requirement for an FRA and that no development should be located in the area shown to be at risk of flooding.

TS11

(4726)

Caithness Biodiversity Group note the slopes below Juniper Bank are important for biodiversity and this should limit the extent of any development at this site.

(4770, 3603, 4944, 2031 - Thurso Community Council) Supportive of a housing allocation on TS11.

(3603)

The site is an eyesore in the town as a result of the derelict caravan park.

(4798, 5076)

States the actual site is larger than shown in the MIR and it should be shown in its fullest.

(2016)

A good site for housing but it will not benefit the town in anyway.

(5092)

Objects to development on the site due to its proximity to the river, its tranquil location and it being visible from the entrance to the town from the South.

TS12

(3627)

Supportive of the Mixed Use allocation which helps provides flexibility. In the event that industrial uses are replaced with residential (which would enhance this area of the town) consideration should be given to ensuring sufficient land for industrial provision elsewhere on the West of the river, especially as this location may be more important for businesses which service Thurso & Wick.

(2161)

Respondent questions the proposals for the site and the need for change as it is currently occupied by houses, retailers and businesses

(2016)

Supportive (assumed) of proposed uses but highlights that the road is busy with traffic and the existing businesses would need relocated first.

(3666)

Development of TS07 (along with TS12 and TS13) would greatly improve the appearance of the river front as it is currently an eyesore. Development needs to enhance the harbour

(4944)

Supportive of proposed uses. Industrial development should be directed towards established industrial estates.

TS12/TS13

(2031)

Thurso Community Council supportive of TS12 and TS13 subject to buffer zone between any future development and river being created and successful relocation of existing businesses.

(3116)

SEPA state that parts of TS12 and TS13 may be at risk of flooding from the River Thurso and the

sea. Developer Requirement for an FRA and that no new development should be located in the area shown to be at risk of flooding.

(4705)

Respondent objects to development on the sites and notes that SEPA have identified that parts of the sites are at risk of flooding and there is no information in the MIR on how these issues will be dealt with. Prefers the site to be recreational greenspace. TS13 also has restricted access from George Street with a narrow track past Bridgend House.

(3666)

Flooding issues need to be considered

(4895, 5092)

Development of TS12 and TS13 would greatly improve the appearance of the river front. The current industrial buildings are an eyesore and project a negative image of the town to any visitors.

(5092)

An iconic footbridge would help to link it directly with the town centre and improve the tourist appeal.

(2014)

Respondent notes the desire to make more of the riverfront and connect it with landward Caithness as discussed at the Charrette. As part of this it would be beneficial to redevelop the unattractive buildings at the riverfront.

(4944)

Supportive of proposed uses.

(2016)

Supportive of a mix of retail, business and housing on TS13. Access is a big problem. Non-vehicular access may be a solution.

TS14

(4944, 5092) Supportive of housing allocation.

(2016)

Currently being built out.

(2031)

Thurso Community Council supportive of mix of uses on TS14.

(3116)

SEPA note that the SEA Environmental Report identifies that TS14 are in an area of blanket peat coverage. The map-based and photographic information we hold does not suggest this is the case. However if you have better information (for example you have visited the site) and you are confident this is the case then a Developer Requirement should be included requiring (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed.

TS15 (4944)

Supports preferred use.

(2031)

Thurso Community Council supportive of Housing and Community uses on TS15

(3116)

SEPA state part of the site may be at risk of flooding from a small watercourse. Developer Requirement for an FRA and no development should be located in the area shown to be at risk of flooding.

TS16

(4944)

Supports housing allocation.

(4798)

States that the site actually stretches all the way to the driving range/golf course and questions why this has been omitted.

(2016)

Questions whether TS16 would help deliver wider benefits to the town.

(2031)

Thurso Community Council supports a Mixed Use allocation of Housing and Business due to proximity of hospital (assumed)

(5092)

Objects to housing on TS16 as there is no need for further housing.

(3602)

Landowners of the site supportive of its inclusion for housing uses. It has direct access from the industrial estate and from Henderson Street. Access points owned by landowner. It is slightly elevated giving views over the surrounding area. It would not obstruct any other properties. It is allocated for housing in the current local plan and the landowner has developed sites at Heathfield since the current plan was adopted. As indicated in the landowner's responses to the Housing Land Audit the land is available and free of constraints. Other sites which have been preferred in the MIR (TS06/TS18) have had a history of objections and public local enquiries have concluded that large sections should be protected. They also contradict HwLDP policy on Settlement Setting (page 154).

TS04/TS06/TS17

(3629, 4944)

It is illogical to exclude TS17 on the grounds that it is removed from employment sites when there is no clear idea of the location or nature of future employment sites. The wider landscape impacts claimed as a reason for the exclusion of TS17 should apply equally if not more so to TS04 and TS06.

(4705)

Respondent supportive of TS17 being allocated for development as it considered to have many advantages over preferred sites including good quality access to existing amenities which reduces the need to travel and access to the East of Caithness.

(5092)

Considers the extent land at TS17 proposed is too large but supportive of a small expansion of the preferred housing siteTS14 into TS17.

(4948)

If more housing is needed then respondent supportive of TS17 being allocated as it would have limited visual impact, on a regular bus route, and it close to the town centre.

(2016)

Respondent highlights major traffic, remoteness and landownership issues on TS17. Prefers that Thurso expands to the west.

(2031)

Thurso Community Council supportive of non-preference of TS17.

(5084)

No reasons for excluding TS17 when sites in the west are being allocated for development.

(1902)

Cllr Willie Mackay would like to see an extension of the housing allocation into the adjacent fields on the same side of the A836.

TS15/TS20

(4683)

Supports non-preferred status as planning permission has previously been refused for TS20 and the local water and sewerage system do not have capacity at present on either TS20 or TS15

TS19

(4944)

Support a housing allocation on TS19.

(5092) Supports non-preference.

TS20

(5092) Supports non-preference.

Thurso West

General Strategy

(3650)

There is a clear strategy for the town to grow to the west but at present there is no indication as to priorities (assumed phasing) and it gives the impression of haphazard development. More detailed 'area by area preferences should be shown'.

(3650)

The strategy fails to identify any opportunities on the east of Thurso despite 'obvious sites potentially available'.

TS04

(3116)

SEPA state that part of TS04 may be at risk of flooding from the Wolf Burn. Developer Requirements for (1) FRA and no development to be located in any areas shown to be at risk of flooding, and (2) watercourse to be integrated into the design of the development as a positive feature. Also, to protect existing water users of the Wolf Burn, we request a Developer Requirement for an enlarged buffer to the watercourse (we recommend 20 m) and text highlighting that discharges to this watercourse are unlikely to be acceptable.

(204)

SNH understand that there is a proposal for community woodland as part of this option, especially

to the SW of the potential bypass route (p 44). Newlands of Geise Mire SSSI which lies to the south of TS04 is a ground water dependant wetland. Planting trees in certain areas of TS04 could affect the ground water which is linked to the SSSI. SNH have been in discussions with the consultants for this proposed woodland and have suggested areas where planting should be avoided to protect the ground water. In these sensitive areas SNH have suggested alternative management to benefit biodiversity rather than planting trees, which would still have access, community and natural heritage benefits. This should be reflected in detailed policy text to accompany any allocation of TS04, in the overall context of there being no adverse impact on Newlands of Geise Mire SSSI.

(5089, 5102)

Objects to Mixed Use developments on TS04. Reasons given include:

The economy is expected to decline due to the decommissioning of Dounreay and Vulcan facilities, the lack of progress in the marine renewables industry and the falling oil prices.

The main reason for new housing at that time was the growth in employment resulting from the decommissioning of Dounreay. This work has now peaked and is in decline.

There is declining and an ageing population and young people are moving away. The need for future housing in Thurso has been significantly overestimated and is based on seriously out of date information (the current HNDA). Additional housing led to a surplus of private and low cost housing. This is confirmed by the house price data in the MIR which shows Thurso has the lowest house prices in Highland.

It is on a north west facing slope and highly exposed to the prevailing wind from the north coast. Older residents will prefer more sheltered locations such as the town centre.

Council Ward Information shows that there has been low numbers of new housing built in the last 5 years and the current stock is adequate.

The background studies to the MIR show that the population of Caithness is in decline and there a surplus of low cost housing in Caithness.

The moorland is an unspoilt natural moor habitat (last grazed 12 years ago) and if properly developed could provide an important recreation area for residents and visitors as it is accessible from the town and has a wide variety of wildlife interests.

Developing TS04 would lead to the 'doughnut impact on the town which has ruined many towns in UK and North America'.

(5092)

Respondent notes the size of the site and questions whether there is demand for such a level of housing. If it is required then TS04 is considered suitable.

(4739)

A limited amount of development on TS04 may be suitable.

(2016)

Landowner of most of TS04 notes that the site has been in the Local Plan since 2002 but that expensive infrastructure, drainage and legal issues need to be overcome first. Considers that business development will kick start development of TS04 at some point. Planned community woodland will benefit the town and stimulate further development in the area. Emphasises the need for a bypass route to be confirmed and a masterplan drawn up.

(3629)

The 2006 planning application for TS04 attracted considerable opposition and will do so again

unless strenuous efforts are made to reduce the impact on existing residents by effective landscaping and avoiding any construction which will result in buildings projecting over the existing skyline to the west of Thurso.

(3672)

There was planning permission granted (but now lapsed) for housing on TS04 and this should be reapplied for and built up before developing elsewhere.

(4771, 3304)

Support mixed use development on TS04 and TS06

(4705)

Wolfburn Distillery relies on the high quality and steady quantity of water from Wolf Burn and any upstream development could impact on this. As a result it could affect the business and jobs.

(4898)

TS04 is not suitable for housing. It must be protected for recreational use and tourism development due to the panoramic views from the site of Caithness and Sutherland. It is natural moorland and is important for biodiversity. Moorland walks could be created like what has happened at Dunnet Forest.

(4898)

The proposed by-pass through TS04 is not required and would lead to access/safety concerns from Provost Cormack Drive. If a bypass was required then better alternative routes are available.

(3666)

Supportive of TS04 as it is already allocated for Mixed Use, adjoins existing housing, is on the edge of bypass route, elevated position provides excellent views and does not detract from view into Thurso.

(4944)

If major new housing is found to be required then TS04 is preferred over TS06 as it will help deliver the bypass, remove congestion of Castlegreen Road and assist with the link between Scrasbter Harbour and Janetstwon Industrial Estate.

(2031)

Thurso Community Council support Housing, Business, Openspace and Community uses at TS04.

TS05

(4686)

Any new housing to the west of Bishops Drive should have its own access from the Thurso / Scrabster road. An increase in traffic through the existing estate would impact on the lives of the residents. The road junction at the Weigh Inn should have been replaced with a roundabout before the existing West Gills was built. This junction must be replaced due to the Scrabster industrial changes let alone any new housing.

(2016)

Supportive of TS05 but emphasises that a phasing strategy is presented for the town

(2031)

Community Council supports TS05 subject to green buffer zones being created for future access to TS01 and TS03 and future bypass route.

(4700, 4700, 4944)

Objects to the allocation of TS05 for housing. Reasons given include:

Sufficient housing land allocated at TS04 and TS14.

When Dounreay decommissioning is complete there will be fewer jobs and an over supply of housing so there is no need to allocate more housing land.

The land is very fertile ground and criss-crossed with dry stone walls which provides an attractive outlook from the town.

Housing allocation on TS05 will conflict in terms of noise, pollution etc with the adjoining industrial sites (TS1 and TS03).

Priority should be on brownfield land before developed greenfield land.

(4705)

Parts of the site are prone to flooding and if drainage issues are not addressed then additional housing could exacerbate the problem.

(5092)

If further housing land is required then TS05 would be suitable as it adjoins the recent housing at West Gills.

(3116)

SEPA state that part of TS05 may be at risk of flooding from the Burnside Burn which has been straightened. Developer Requirements for (1) measures to be taken to naturalise the course of the watercourse through the site, and (2) FRA and no development to be located in any areas shown to be at risk of flooding after any watercourse improvement works.

TS06 & TS18

(4897, 4899, 4839, 3666, 4948, 3601, 4944, 3599, 3640, 2073, 4937, 4936, 4658, 4798, 5076, 5078, 5079, 5081, 3651, 5089, 5095, 5092, 5090, 5022, 3681, 3608, 5103, 5130, 5102, 5103, 5118, 5094, 4739) Objects to development on TS06 and TS18,

(3678, 3666, 3629, 3650, 3603, 5084, 4979, 5066, 5056) Objects to development of TS06 only and

(4768, 2014, 2048, 4977, 3595, 5123, 5121) Objects to development on TS18 only. The reasons given include:

General issues covering both sites:

Sense of openness of the area and the green spaces are important to the setting of the town. Recognised as an important open greenspace which adds character to the north west of Thurso and the approach into the town. It will create an overdeveloped feel which is what makes the place attract to people who want to relocate to the area.

"Policies in HwLDP protect views over open water and the Settlement Setting".

The site should be protected for community and open space uses including outdoor recreation (picnic area, shrub/tree planting, active travel links, play areas for children etc) as this will link to the Highland Play Strategy).

The current Amenity allocation must be preserved. The current local plan states that the Council will explore the availability of funding to develop open land to the north of Pennyland Farm as a public park and playing fields.

It is prime agricultural land which is regularly used for livestock grazing. This helps maintain a healthy balance of land uses in the area.

It helps preserve the distinction between Thurso and Scrabster and development of the sites would be detrimental to both settlements. The importance of maintaining green networks and avoiding coalescence between settlements is set out in the HwLDP.

There have been strong objections to developing the site for over a decade. Previous Public Local Inquiries of 1994, 2001 (as part of the preparation of the Caithness Local Plan) and 2007 have concluded that the area should be protected as openspace. It is reported that one Enquiry Reporter concluded that "Available land and a willing owner does not justify development through either local plan use allocation or the granting of planning permission."

The landowner is only looking to benefit from the increase in land value.

The proposals at TS06 and TS18 conflict with national policy on town centres (e.g. National Review of Town Centres) highlights the need for local authorities to support town centres before considering development elsewhere. There are numerous vacant and derelict buildings in Thurso town centre which could be developed before sites at Pennyland.

Royal Hotel states that a hotel would result in an over provision of accommodation in Thurso. Two large existing hotels close during the winter months due to a lack of business.

It will put people off coming to the county.

Pennyland should be protected through the Special Landscape Area designation.

Mixed Use allocation on TS06

Residential and mixed use development could severely compromise the sense of openness Respondent understands that potential developers are already interested in the site.

There is no need to build houses on TS06 as there is already planning permission for 400 new houses at land on TS04. There is also sufficient housing land identified elsewhere in the town, e.g. TS05. There is no need for further housing land to be identified as there were only 170 house completions between 2006 and 2010.

Pentland Housing Association has owned land at TS04 which has never been built due to lack of demand.

There is no demand for additional housing due to economic (decommissioning of Dounreay, lack of progress with marine renewables) and demographic changes (ageing and declining population, declining school roles) facing the area (see above).

Commercial development should be located at existing business parks, the town centre or the Enterprise Area.

Other suitable sites which have not been considered include Springpark, Heathfield and north land of Dunbar Hospital. Land adjacent to TS16 has been omitted from the Plan.

There is already a live planning application for a supermarket on TS08. There is no need for another supermarket since the existing Lidl has expanded. Two supermarkets within close proximity of each other is not appropriate. If there was found to be demand then the former mart site is more suitable.

There is already a problem with congestion at the nearby junction during rush hour.

Only if no alternative site can be found that we should consider TS06.

Tourism/Leisure allocation on TS18:

The views should be protected. It would breach the Council's own policy on protecting open views to seascapes.Last remaining area which provides uninterrupted views from the A9 out to the Bay. Development on this site would spoil the sense of place and ambience.

The SEA Environmental Report Landscape Objective recognises the importance of the landscape and aims to protect it from inappropriate development.

Visitors would be put off visiting the town if the site was developed. It would detract from the impression which visitors get when arriving from the West.

It will detract from Victoria Walk which is an important tourist attraction.

Disagrees that Thurso should aim not to be a stepping stone for visitors going to Orkney as Orkney have been successful in marketing the area and Thurso benefits from this.

A view is not important for a hotel and tourists would only consider it a bonus rather than a necessity.

There is no demand or a business case for another hotel, particularly with Dounreay closing. Two large hotels in Thurso close of the winter period. There has also been a substantial increase in the number of accommodation in Caithness over recent years, e.g. Natural Retreats. These hotels received large public sector financial support and this could be wasted.

If the hotel business fails it may then be considered for alternative uses.

If there was a business case made then it should be located in the town centre. A new hotel if required should be built at the business park or on TS01 or TS03.

Questions the figures on number of guests and jobs created which a hotel could attract presented by the landowner and quoted in the local media.

Any jobs created would be displaced from existing businesses. Create undue competition with Thurso's six other hotels. Tourism jobs are not the most desirable due to them often being seasonal, low paid and low skilled.

A hotel will not attract people to the area. It would simply pull visitors away from existing hotels in the area. Marketing of the area is the only way to drive tourism.

The development would be built for tourists and not local residents to enjoy the area.

There are alternative sites which could be better developed for a hotel, e.g. on land at TS04, Bridgend, former mart site, Thurso Castle or old crab factory. Brownfield sites should be a priority.

Visitors need to have better experiences in Thurso so they return to and recommend the area. The 'green buffer' would along the road side would be better along the existing houses at Pennyland to protect their view.

Coastal stability and the impact on the caves below Victoria Walk are a concern as erosion is already visible along Scrabster Road.

There is already a problem with sewage in the nearby coastal area and any new development would add to this.

Identification of the sites would contradict several statements in the CaSPIan strategy including sufficient levels of housing land already identified, focusing new development in and around town centres, protecting and promoting town centres, minimising impacts on the landscape and natural landscape, and creating/maintaining green networks.

(4977, 4979)

If the hotel was to go ahead it should be no closer to Victoria Walk than the camp site building.

(3678)

There is potential to develop in the grounds of Pennyland House and this would remove any pressure to develop on the fields at Pennyland.

(3629)

With Tesco declaring that it is no longer developing TS08 it is now available for housing and this would relive pressure to develop TS04 and TS06.

(3672)

If TS06 was developed for housing there should be amenities such as shops, bus services and community uses

(204)

TS18 slightly overlaps with Pennylands SSSI, which would require attention if this site does not remain non-preferred.

(4792, 4790, 4779, 4787, 4766, 4761, 4745, 4844, 4840, 2032, 3603, 5069, 5077, 5078, 4955, 4954, 4953, 5085, 4978, 4983, 4941, 4763, 5096, 5091, 5012, 5018, 5041, 5042, 5043, 5044, 5052, 4934, 5059, 5131, 4984, 5101, 4932, 5051) (assumed support: 4794, 4771, 4770, 4765, 4755, 4849, 3304, 5073)

Supportive of a Leisure, Tourism and Openspace allocation on TS18. Reasons given include:

The proposals will help deliver the wider strategy/outcomes for the area and would help to drive further investment in the town.

It would help to retain young people in the area.

It would be a significant improvement to the town and Caithness as a whole in terms of modernisation and investment for future generations.

Thurso needs developments such as this which make the most of the unique location to continue to prosper. Maximise the area's natural assets and the views over Thurso Bay for tourists and local residents. The proposals would help people to enjoy the view out to sea.

It will be an important addition to the tourism offer in Thurso which at present lacks facilities/attractions for visitors.

A quality hotel in this location would also lead to improved coastal walkway which would be significant improvement to the area.

The site is within walking distance of Thurso town centre and of Scrabster and to local facilities.

There is a lack of high-quality tourist accommodation. There is great demand for such a hotel from tourists and people visiting for business. It would help attract and retain more visitors to the town. It would attract more people to the area which would lead to a boost for other businesses and hotels.

Reassurance that it is a local businessman who is proposing the development and not a multinational corporation. The landowner is considered to be determined to deliver the project. Landowner has good reputation in the hospitality industry.

The investment would far outweigh the small loss of view.

The community would be proud of such a facility.
The pub/restaurant in this location would be used a great deal by local residents.

Indirectly help to deliver newer housing.

The site is largely unused at present with sheep grazing during the summer months only.

To much emphasis has been given to individual's views from their houses (which would not be particularly obstructed).

(4839)

TS06 and TS18 form a natural break between Thurso and Scrabster and enhance the appearance of both places. Even low density development would have a detrimental impact on the 'visitor impression of Thurso'.

(2032, 4840)

Supportive of a new hotel on TS18 in the best possible location for overlooking the sea and the best view as the proposal is for a high quality building. The hotel should be as close to the town centre as possible to ensure easy walking distance.

(4940)

"TS18 should be developed into an amenity that will benefit the town and community. This is an ideal location for development that would capture the imagination of locals and tourists alike"

(2031)

Thurso Community Council supportive of Housing, Business, Community and Openspace uses on TS06.

(2031)

Thurso Community Council supports a Mixed Use (business, tourism and community uses) allocation on TS18 as they consider there is an opportunity to develop the site into much needed tourist related business. It would also be nearer to town centre allowing the benefit of business spin-off. Any future development of this site could also allow improvement of the coastal walk.

(3304, 5077)

Supportive of the community woodland proposal.

(2016)

Landowner of TS18, TS06 and most of TS04 responded making the following points:

He is a local resident who was born and brought up in Thurso and emphasises he has Thurso's best interests at heart. As an owner of several businesses he has had a good understanding of the issues facing and opportunities in Thurso for over 30 years.

Thurso Charrette - Mr Taylor highlights that the Thurso Charrette (which helped to inform the MIR) was carried out by independent planning and design consultants who had no pre-conceived ideas of the town. Emphasises that the consultants looked at the town from a fresh point of view and together with input from attendees identified areas for development which had not previously been considered. The only proposal which wasn't debated during the charrette was the hotel/community site on TS18. Following the charrette Mr Taylor commissioned the consultants to prepare a masterplan for his land which emphasised public space and community benefit.

Community debate – following the publication of the MIR and the subsequent non-preference of TS18 Mr Taylor looked to start a debate on his proposals to raise support TS18 amongst the local community. Surprised by the level of support for TS18 and TS06.

Plans for Thurso West – Plans have been identified for expansion of the town to the west since 2002 but a couple of proposed developments which would have kick started the expansion have been thwarted.

Commercial interest – Mr Taylor is the landowner of a large proportion of the allocated land in Thurso and has been approached by various types of businesses interested in locating to the town. As a result he states that land should be allocated for housing, retail, different types of hotel accommodation, tourism, business and technology.

The Plan benefits from several of the large potential development sites being owned by one family. Opportunity to create a masterplan for much of the west side of Thurso.

Attracting investment - Scrabster is positioning itself for growth and the new Local Development Plan has to be ready for, willing and flexible enough to accommodate change. Wishes to see 'attracting investment' promoted as a key aim of Thurso. The economy is recovering and development of TS04, TS06 and TS18 can deliver a brighter and sustainable future for the town.

TS18 - with very considered and careful design, the benefits, both financial and community, far outweigh any small loss of amenity in this area. Amenity value will be improved as there is limited amenity value at present.

Considers TS06 is key to kick starting the proposals in CaSPlan.

280 acres available for the community woodland and a path network and green spaces coming down all the way to the hotel will deliver something great.

ADDITIONAL SITES

Viewfirth Park (extension to TS09)

(2155) 'Should be left as it is'

(4944)

Objects to Viewfirth Park being allocated for Community uses. Reasons given include:

The site is constrained and does not allow for potential expansion

New facilities should consolidated with existing facilities

The area is residential and the increase in traffic would result in congestion problems.

(5111, 5210, 5211, 5213, 4756, 5216, 5217, 5219, 5220, 5221, 5227, 5230, 5231, 5232, 5233, 5235, 5236, 5237, 5238, 5240, 4800) Supportive of the extended Community allocation at Viewfirth Park. Reasons given include:

Sporting facilities would be a very useful and necessary facility for the area.

There is a significant lack of sporting facilities in the town and wider area.

New sporting facilities on the site would reflect the park's original use.

North Highland Harriers running club is thriving and the club is in need of better facilities. It would be a major boost for youth development.

The site benefits from a central location and good links from public transport.

The sports clubs provide a focus for health and fitness for a range of abilities and the facilities at present are sub standard.

Many active sports clubs in the area (e.g. athletics, running and gymnastics) which would greatly benefit from a purpose built sports centre.

Current users of the park (e.g. dog walkers) may not need to be excluded from the area if it was to be redeveloped.

Within a residential area and close to schools which means it is very accessible.

It is a brownfield site which is better being restored than lying derelict.

The openspace is wasted at present and there is a problem with dog fouling.

Current 400m+ events are held at the boating pond which is 426m in diameter.

Athletics club is a maximum capacity due to restrictions in the existing venues.

Any tall building should be kept in a central position as not over impact on privacy of local residents.

The existing play park should be improved as part of the plans for a new sports facility.

(4678)

Supportive of a community centre at Viewfirth Park

(2087)

When reviewing development plan consultations, sportscotland endeavours to identify all outdoor sports facility sites in respect of which we are a statutory consultee where there is an indication that they are proposed for allocation. Whilst it is appreciated that there are no clear plans at this stage as to how the sites may be developed, sportscotland respectfully request that the following comments be considered if the sites are to be allocated in the Plan.

The proposed development is ancillary to the principal use of the site as an outdoor sports facility;

The proposed development involves a minor part of the outdoor sports facility and would not affect its use and potential for sport and training;

The outdoor sports facility which would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location which is convenient for its users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for its users and which maintains or improves the overall playing capacity in the area; or

The relevant strategy and consultation with sportscotland show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site could be developed without detriment to the overall quality of provision.

If sportscotland are correct in identifying the outdoor sports facilities on these sites then we recommend:

Retention of the outdoor sports facility for that use; or

As part of the LDP process, consideration of the loss of the outdoor sports facility against the criteria outlined in paragraph 226 of SPP to assess whether national policy is satisfied; or

If none of the criteria outlined in paragraph 226 of SPP have been met and the site is still to be allocated for redevelopment, acknowledgment in the text of the Plan referring to the site containing/impacting upon an outdoor sports facility, and reference to the need for the requirements of the SPP to be met at the planning application stage.

(5222)

Supportive of development of a new sports centre in Thurso but unsure whether Viewfirth is the best location.

(204)

The 2010 open space audit for Thurso carried out for the Highland Council does not identify whether there is a need for a new sports facility in Thurso, nor whether Viewfirth Park in its current form is a green/open space valued for recreation/use as an outdoor sports facility. The public comments submitted as part of the current consultation on the additional allocation site may give the Council some indication of local feeling and needs for this site and Thurso in general. SNH advice is that the park in its current form is likely to have some amenity, recreational and open/green space value, therefore any new development should seek to maintain and/or enhance these attributes where possible

Interim position agreed by Area Committee:

The preferred strategy in the MIR was largely based on the outputs of the Thurso Charrette which was carried out in 2013. The principles identified at the Charrette were generally supported by those who responded to the MIR consultation. We recommend that this should continue to form the basis for the strategy of the Proposed Plan.

It was generally agreed at the Charrette that the strategic expansion of the town should continue to be to the West. The potential bypass route was realigned to the west of the Business Park. Key housing sites were identified at Pennyland, West Gills, Heathfield and Juniper Bank and sites for Business and Industrial uses at Scrabster Harbour and Scrabster Main Farm. Several brownfield sites were flagged as priorities for redevelopment including the former mart site and regeneration areas around the harbour and river corridor.

The site options at Pennyland (TS06 – Land West of Pennyland House, TS18 – Land North of Pennyland House and TS04 – Land North West of Provost Cormack Drive) raised significant debate. Valid points were raised both for and against development. It is recognised that the sites TS06 and TS18 are sensitive as they form an important entrance into the town and give the West of the town a sense of openness.

It is recommended, however, that the proposals for a hotel and public park on TS18 are supported for a number of reasons. As many respondents highlighted, with the decommissioning of Dounreay alternative sources of employment must be supported. The tourist industry is considered as a major growth sector and could help to support a variety of employment opportunities. Visit Scotland's '*Aspirations and Ambitions… our development opportunities*' report identifies the need for higher quality hotels in the north of Highland and particularly in Caithness. The need to grow the food and drinks industry is also identified. Developer Requirements would be set to minimise the landscape impact and ensure that it is designed to a high quality.

The hotel development would also help to open up the area for the enjoyment of the wider community. Although the area has been marked as 'Amenity' land in both the existing local plan and the MIR the site has limited actual amenity value for residents or visitors. Victoria Walk is an important asset to the area but at present is used mainly by dog walkers or those travelling into the town centre. The provision of car parking and improved access to Victoria Walk could greatly improve the accessibility to the coast for tourists and the wider community.

TS06 was identified as suitable for Mixed Use development at the Charrette. As such the site was 'preferred' in the MIR for Business, Housing, Community and Openspace uses. Based on the

timescales of this Plan it is recommended that only certain parts of the site are taken forward. It is considered that a small Housing allocation on the east of TS06 be taken forward to add greater flexibility of housing options in Thurso West. Developer Requirements will be included to ensure it is designed in a way which respects the B-Listed Pennyland House and Steading and the view from the A9.

Interest has been expressed in developing a new petrol filling station at Pennyland. As there appears to be a lack of filling stations on the West side of Thurso it is recommended that a retail allocation (petrol station only) is identified at land East of Thurso Business Park on TS06. This would form part of a small Mixed Use allocation which includes Business uses to allow for small scale business units. This allocation would allow for greater scope to open up TS04 for development and cluster commercial uses around the existing Business Park.

One of the 'Placemaking Priorities' highlighted views that a new supermarket was needed. At present however it appears that there is not a requirement to allocate land for a large supermarket. We have had no direct contact from any supermarket retailer interested in developing in the town since the MIR was published, and Lidl have recently expanded their store at Pennyland to almost 1,350m² in sales area. The former mart site still remains the preferred choice and live permission for such a development exists on the site.

The large scale expansion for housing development suggested to us at Mountpleasant/Thurso East is not recommended to be allocated. The main direction of growth for the town is well established. Sufficient land is identified in the West for housing and employment uses together with suitable infrastructure improvements. At present there appear no significant justifications for expanding to the east.

The site at Viewfirth Park featured in the Additional Sites consultation as the MIR TS09 was extended due to interest raised in developing the site as a sports facility. The response was overwhelmingly positive and we recommend that the larger Community allocation is continued through to the Proposed Plan.

Recommended Council Response:

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Caithness Local Plan will be carried forward.

Strategy and Place-making Priorities

The preferred strategy in the MIR was largely based on the outputs of the Thurso Charrette which was carried out in 2013. On the whole, those who responded to the MIR consultation generally supported the principles identified at the Charrette. We recommend that this should continue to form the basis for the strategy for Thurso in the Proposed Plan.

It was generally agreed at the Charrette that the strategic expansion of the town should continue to be to the West. The potential bypass route was realigned to the west of the Business Park. Key housing sites were identified at Pennyland, West Gills, Heathfield and Juniper Bank and sites for Business and Industrial uses at Scrabster Harbour and Scrabster Mains Farm. Several brownfield sites were flagged as priorities for redevelopment including the former mart site and regeneration areas around the harbour and river corridor.

One of the 'Placemaking Priorities' in the MIR suggested that a new supermarket was needed. This was partly included to encourage feedback from the local community as to whether or not a supermarket was still required. At present it appears that there is not a strong desire for a new supermarket. We have also not had any direct contact from any supermarket retailer interested in developing land at Pennyland since the start of the CaSPlan preparation process. Lidl have recently expanded their store at Pennyland to almost 1,350m² in sales area. The former mart site still remains the preferred choice over Pennyland and live permission for such a development

exists on the site. Therefore we will not take forward the reference to the supermarket within the Placemaking Priorities.

Reference will be made to improving connections to the wider green network including a footpath from Thurso, along the Mall walk and eventually reaching Loch More.

SNH requested an additional place making priority "Avoid any adverse effect on River Thurso SAC and SSSI". However following the HRA a paragraph been included in the settlement text which addresses this issue and specific references have been added to the Developer Requirements for TS10, TS12, and TS13. We are awaiting confirmation from SNH of appropriate mitigation measures which may be added to these.

Housing Demand/Supply

Please see Issue 2a 'Housing Needs in Caithness and Sutherland' for the response to general comments on our approach to identifying housing demand and allocating an effective supply of housing land.

Several respondents questioned the need for more housing when there is planning permission for 400 houses at Pennyland. For clarification the planning permission at Pennyland/High Ormlie (05/00573/OUTCA and 06/00587/REMCA) has now expired. As outlined below the area will remain in the Plan but some components of it will be identified for long term expansion. A total indicative housing capacity for Thurso West has been identified as 180 houses.

Strategic Road Improvements

Strategic improvements to the road network in Thurso have been considered for several decades. The creation of a distributor road and relief road has been regarded as an important component to relieve current transport issues and to support the further growth of the town.

Informed by the Council's Transport Planning Team, it is considered that there is a robust rationale for the inclusion of the distributor/relief road in the local development plan:

- One of the main constraints within Thurso is the reliance on a single road crossing of the River Thurso. This leads to congestion problems during particular situations.
- It would help relieve traffic congestion in the town centre. The A9 Trunk Road runs through the centre of the town. However the town centre is not suitable for HGVs or transporting large haulage items due to the narrow roads and sharp corners. Traffic is regularly forced to stop or roads closed when large vehicles move through the town centre.
- The traffic congestion and HGV movement is likely to increase due to the expansion of commercial activities at Scrabster Harbour and at the Enterprise Area at Scrabster Mains Farm which the Scottish Government is actively promoting in the National Planning Framework 3. The expansion of the marine renewables industry and increase in business from the oil and gas industry in the area will also put greater pressures on local roads.
- Developments such as that proposed at Pennyland and Scrabster may require further access points off the A9 trunk road and other proposed development will increase traffic onto the A9 via existing junctions. Together these will contribute to traffic congestion moving through the town on the trunk road.
- The creation of a distributor road is required to open up housing and employment allocations in the west of Thurso. Although these are some of the most suitable expansion sites many have been held back due to the need for investment in transport infrastructure. It is important that the road is designed to be potentially upgraded to relief road status and sufficient land is safeguarded.
- Identifying potential routes for strategic improvements will help to ensure that they are safeguarded from development which may impact on the feasibility of its delivery in the future. The bypass route identified in the Caithness Local Plan was challenged in the past. A PLI was carried out which concluded that the route should be preserved. As a result it defined the western edge of the housing estate at Upper Burnside.

The potential relief road route was a topic of discussion during the charrette. There was a general consensus that the preferred route was to pass on the west of the Business Park. The comments made during the MIR consultation are generally supportive of this amendment. However, due to the uncertainty of which route is technically the most suitable, we propose to show both the route shown in the existing Caithness Local Plan and that identified at the Charrette.

Despite the amendment to the potential bypass route it is also recommended that the route defined in the existing Development Brief is continued to be protected 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. An option for the bypass to be routed on the east side of the business park should be safeguarded. Sections of the distributor road on this route should be designed to be able to be readily upgraded to bypass level.

In relation to the bypass Transport Scotland highlighted that SPP states that spatial strategies should be deliverable. Although it is recognised by the Council that there is no commitment by the organisations who may deliver such strategic transport improvements it is also widely understood by other stakeholders. Despite this there is a strong desire by the Council and the local community for the routes to be shown in the Plan.

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

It was also noted that CaSPIan shows a major area of proposed development at Pennyland, to the west of Thurso. While some of the eastern parts of this area could be accessed from existing residential streets this will not be possible for areas to the west. Additionally Business allocations in the western part of the site will require additional access. A road network will therefore be required from the existing A836 into the site and this could form the basis of the type of western distributor envisaged in the 2002 local plan.

Transport Planning concluded that the approach set out in the 2002 Local Plan is reasonable. It allows the provision of a western distributor road to serve the development areas to the west funded by the developers and in the longer term can form the basis of a new river crossing and connection over the railway line to the A9 to the south. This will inevitably require public funding but when completed will provide an alternative route to the north and west of Thurso avoiding the town centre. In the meantime it is recommended that land should be safeguarded for the new river crossing and connections. The final connection to complete the route to Scrabster will require safeguarding of route options each side of the long term housing site as shown in the Proposed Plan.

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

Prioritising Brownfield Land

As mentioned in Issue 2b Managing Growth, we prioritise and promote development of brownfield sites. This takes the pressure off greenfield land and helps to regenerate towns and villages. However, due to the potentially high additional costs involved or the general unsuitability of sites available we often need to allocate suitable alternative greenfield sites to ensure that valuable

investment in the area is not discouraged.

Flood Risk Concerns

We have worked closely with SEPA to ensure that the sites recommended for inclusion in the Plan are either not at risk of flooding or a flood risk assessment is required to be carried out as part of the planning application process. This may affect the developable area and ultimately inform the final decision on the development.

Sites

TS01/TS02/TS03

The sites are recommended for Business and Industrial allocations as they help to support national and Council aims of helping to grow the marine renewables sector. TS01 was identified as an Enterprise Area by the Scottish Government in 2012 for renewable energy related development. This was mainly due to the importance of Scrabster Harbour to improve its facilities and recognising the finite space available at the existing harbour area. A planning permission (14/00418/FUL) for a new access road and 11 industrial plots was approved for Scrabster Mains Farm. Landscaping/screening will be added as a developer requirement to reduce the visual impact, particularly from the west. As TS03 will not be an allocation but identified as a potential longer term site there will be no developer requirements set out at this time. Concerns over flood risk will need to be added if and when the site is taken forward as an allocation in the future.

TS03 was identified during the Thurso Charrette for employment purposes, more specifically as a long term expansion of TS01. It is recognised that inclusion of additional land south of the enterprise area (TS03) likely exceeds the requirements for business and industrial land. We recommend that it stays in the Plan but as a 'long term site' in order to provide flexibility and form part of the longer term vision for the area.

General support for TS02 is noted. A Developer Requirement will be added to TS02 for a survey to be carried out of small blue butterfly/kidney vetch and appropriate mitigation.

TS05 – West Gills

The issues raised are noted. Concerns over the amount of housing land are addressed above. It is recognised that the land is relatively good agricultural land and the stone dykes are valued features of the landscape. As our aim is to direct development to either brownfield sites or the most suitable greenfield in the short term it is recommended that TS05 is included as a longer term potential housing site only. Allocation of the site will need to be considered during future plan reviews. If and when the site is allocated in the future then specific developer requirements will be identified.

TS07 - Thurso Harbour

The general support and reasons given for a Community allocation at the harbour are noted. The points raised regarding an alternative site for surfing facilities at Thurso East may have some validity. As the site proposed at Thurso East lies outwith the Settlement Development Area an application could be generally supported by the wider strategy outlined in CaSPlan. The decision would also then be made against the HwLDP planning policies. However, there have been previous efforts made by Caithness Sports Facilities Ltd to develop a site at the harbour and a Community allocation would help establish the principle of such a proposal. The Community allocation (specifically for water sports facilities) is not intended to prohibit any expansion plans of the existing businesses at the harbour. This will be addressed in the Developer Requirements for the site.

TS08 – Former Mart Site

The reasons given in support are noted and agreed. The mart site was chosen by a Scottish Government Reporter as the more suitable site for a new supermarket over an alternative application at Pennyland during a PLI in 2007. The planning permission is now 'locked on' as Tesco provided evidence that a 'meaningful start' has been made. In recent months the new site has been purchased by a development company who are exploring mixed use options for the site.

It is therefore recommended that the site is allocated for Mixed Use (Retail, Business, Tourism, Community and Housing) to provide a flexible planning framework which encourages the redevelopment of the site.

TS09 – Viewfirth Park (including extended boundary)

The reasons given in support are noted and agreed. Since the MIR interest was shown in developing the whole of Viewfirth Park as a sports facility. As a result an extended version of the site was included as part of the Additional Sites consultation. We recognise the need for improved sports facilities in both Thurso and the wider area as the existing indoor facilities are heavily used and the outdoor athletics facilities are often not fit for purpose.

A member of the public requested that Viewfirth Park be protected for a new school. However the Highland Council's Care and Learning Service confirmed that there are no plans to rebuild/relocate the schools and that there was no need to allocate land in the town for such purposes.

It is recommended that the whole of Viewfirth Park is allocated for Community uses. The developer would be required to carry out a Transport Assessment with particular focus on the potential impact on the local transport network, and access arrangements and parking issues.

TS10 – Millbank

The comments in support are noted. As outlined in the SEA site assessment the Mill is B-Listed and the Foundry is C-Listed. As a result the developer would be required to carefully consider the protection and where necessary retention of the key cultural heritage features.

On SEPA's advice a Developer Requirement will be included for an FRA and that no development should be located in the area shown to be at risk of flooding.

It is recommended that the site be allocated for Mixed Use to maintain a flexible and positive policy planning framework.

<u>TS11</u>

A developer requirement will be added for a setback from the slope to the east side and from the railway line. In case of different ownership a requirement will also be made for access to extend to the former caravan park. The existing field track which is also a core path should be retained and made into a positive environmental and recreational feature.

<u>TS12</u>

Concerns over the impact on existing businesses are noted. However, the Plan allocates large amounts of business and industrial land elsewhere in the town including at the mart site, expansion of the business park and at Scrabster Enterprise Area. The redevelopment of the riverside is a medium/long term vision which would support the change of use from industrial to cleaner mixed use development if and when sites became available.

Thurso East (TS14/TS17)

Points put forward in support of development are noted. However, the main direction for growth of the town (to the west) is well established. Sufficient land is identified in the West for housing and employment uses together with suitable infrastructure improvements. At present there does not appear to be significant justification for expanding to the east. If such reasons were presented then other sites may be preferable such as land at Oldfield as it could help to round and provide a better entrance into the town. As a result the large scale expansion for housing development suggested to us at Mountpleasant/Thurso East is not recommended to be allocated.

Pennyland - TS06/TS18/TS04

The site options at Pennyland (TS06 – Land West of Pennyland House, TS18 – Land North of Pennyland House and TS04 – Land North West of Provost Cormack Drive) raised significant debate. Valid points were raised both for and against development. It is recognised that the sites

TS06 and TS18 are sensitive as they form an important entrance into the town and give the west of the town a sense of openness.

It is recommended, however, that the proposals for a hotel and public park on TS18 are supported for a number of reasons. As many respondents highlighted, with the decommissioning of Dounreav alternative sources of employment must be supported to help attract investment and jobs. The tourist industry is considered as a major growth sector and could help to support a Visit Scotland's 'Aspirations and Ambitions... our variety of employment opportunities. development opportunities' report identifies the need for higher quality hotels in the north of Highland and particularly in Caithness. The need to grow the food and drinks industry is also identified in the report. To ensure a high quality development which minimises the impact on the landscape, the developer will be required to produce a masterplan for the site which will address issues including the siting and design of the hotel, provision of a public park area, landscaping, access from the A9, enhanced active travel connections and coastal walk improvements. High quality, low level design is essential. The inclusion of features such as stone dykes can also help to integrate the development within its surroundings. The visual impact can be reduced by locating the hotel on the eastern side of TS18 which will maintain open views to Dunnet Head and Scrabster Harbour along the A9 at the Weigh Inn.

With the hotel development being associated with the creation of a public park it would help to open up the area for the enjoyment of the wider community. Although the area has been marked as 'Amenity' land in both the existing local plan and the MIR the site has limited actual amenity value for residents or visitors. The Caithness Local Plan set out support for enhancing the public amenity of TS06 and TS18, including creating a playing field and pitch and putt course. These facilities have never been delivered and the proposals set out in CaSPlan present a more likely mechanism for achieving greater public access to and amenity of the area.

Victoria Walk is also a valuable asset to the area but at present is used mainly by dog walkers or some people travelling into the town centre. The provision of car parking and improved access to Victoria Walk could greatly improve the accessibility to the coast for tourists and the wider community.

TS06 was identified at the Charrette as suitable for Mixed Use development. As such the site was 'preferred' in the MIR for Business, Housing, Community and Openspace uses. Based on the timescales of this Plan it is recommended that only certain parts of the site are taken forward. It is considered that a small Housing allocation on the east of TS06 be taken forward which may help to enable development at Thurso West. Developer Requirements will be included to ensure it is designed in a way which minimises the impact from the A9 and respects the B-Listed Pennyland House and Steading.

According to the landowner there has been interest expressed in developing a new petrol filling station at Pennyland. Although the former filling station on Ormlie Road has recently re-opened there may still be demand for a filling station closer to the A9. As a result it is recommended that a retail allocation (petrol station only) is identified at land East of Thurso Business Park on TS06. This would form part of a small Mixed Use allocation which includes Business uses to allow for small scale business units. This allocation would allow for greater scope to enable wider development of TS04 and cluster commercial uses around the existing Business Park.

Through consultation with relevant agencies and from feedback through the MIR there is concern that more should be done to encourage visitors to stop and spend time in Caithness on their way north to Orkney. A high quality hotel in this location and the creation of an easily accessible public park alongside the A9 would be important additions to the town and help to retain tourists in the county for longer. This would then help to create employment opportunities and have positive economic impacts on the wider area.

Concerns over the economic feasibility of the hotel proposal appear unjustified. At both national and local levels there is a desire to grow the tourist industry in Caithness and Sutherland. Visit

Scotland identifies a lack of medium-level hotels in Caithness. Initiatives such as the North Coast 500 and organisations such as Venture North are already helping the industry to grow and the demand for bed-space is likely to increase. It is acknowledged that gaining finance can be a constraining factor for development in recent years but this is due to financial institutions being more risk averse. If the landowner or a development company gains finance it is a good indication that a strong business model has been put in place.

Suggestions of other possible sites for a new hotel were suggested. However, there has been a lack of landowner/developer interest in taking any of these sites forward. Many of the other locations are also arguably less attractive for a quality hotel.

To preserve a sense of openness the development of the hotel will be tied to the delivery of a public park. This will help to formalise the amenity land and preserve more than half of the existing open fields to the north of the A9. In addition a development setback along the south of the main road together with good quality, low-level siting and design of built development will mean that the sense of openness is retained.

The concerns over the coalescence between Thurso and Scrabster/Burnside have been considered. However the extent of coalescence of Thurso and Scrabster has already occurred and no change is proposed to land between Burnside and Scrabster. The concerns over coalescence between Burnside and Thurso is not justified as Burnside is a relatively modern housing estate with few, if any, services or facilities. The area should be considered as a suburb of Thurso and not as a stand-alone community. The suggested setback on TS06 and the public park will mean that a sufficient gap remains between the two areas to maintain a sense of openness. These areas will also serve as parts of the green network serving as a continuous green active travel corridor from the sea, through Pennyland, to the moorland at High Ormlie and out past the golf course.

The request that Pennyland should be allocated as a SLA is addressed in Schedule 4 Issue Environment and Heritage.

The recommendations are not considered to contradict several other statements within CaSPlan or the HwLDP. Although the site is located outwith the Town Centre Boundary the hotel proposal is considered as being largely location dependant. A unique selling point of a hotel, spa and restaurant would be its location, looking over Thurso Bay. This would appeal more to tourists rather than business and budget visitors which the current hotels appear to be largely geared towards. It is therefore considered to provide an additional tourist draw to the town rather than an out-of-town development which would compete with town centre businesses. With improved pedestrian linkages including Victoria Walk the town centre would still be easily accessible from the site.

Settlement Setting is a feature which the Council identifies as part of Policy 57 of the HwLDP. It aims to protect areas which are intrinsically important to the setting of a settlement such as land between settlements. As stated above the issue of coalescence is not considered to be significant between the relatively new housing estate at Upper Burnside and Pennyland. Scrabster can be considered as a settlement as it was established between the Braes of Holburnhead and the sea due to the harbour. East Gills, Burnside and Upper Burnside have been created since the second half of the 20th Century and with no facilities and services there is no distinct 'settlement'. Although the sense of openness should be preserved the land between the areas should not be protected for coalescence reasons.

Planning History

The planning history of Thurso West has been taken into consideration in the preparation of the recommended strategy for Thurso. Many of the issues which were considered in previous planning applications and PLIs, however, have limited bearing to the decisions on the options which are now available. The conclusions drawn from previous PLIs, for example, were mainly based on the comparison of potential development sites within Thurso West or across the town

more generally. Many of these previous options have now been either built out or are not being actively pursued by the landowner. The decision is now less concerned with determining which site is better but ultimately about the extent to which land at Pennyland has potential for development. As highlighted in sections above, following careful assessment it is considered that various proposals can be accommodated at Pennyland with appropriate mitigation to minimise the visual impact while also maximising benefits. Many of the proposals are important for economic development, improving access to quality public open space and delivering strategic transport improvements.

Issue 7: Tongue

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future			
MIR reference:	Question 7: Tongue			
List of respondents (including customer number):				
Scott Coghill (4685)		Ngaire Mingham (5097)		
Julie Thompson (4694)		Wild Land Ltd. (5114)		
John Ferguson (4698)		Altnaharra Estate (4579)		
Highland Council CPAM Team (3627)		Bob Reid for Wild Land Ltd. (5025)		
Stuart Nicholson (4725)		G Skene for Peter Burr Stores (5057)		
Scottish Natural Heritage (204)		Paul Houghton Planning for The Church of		
Scottish Environment Protection Agency (3115)		Scotland General Trustees (4639)		
North Coast Connection (5088) John Cormack (2106)		、 <i>,</i>		
Summary of the comments received:				

General

Report should carry over mitigation identified in SEA Environmental Report (204)

Development of the area should be supported, rather than concentrating growth on east coast 4579)

A potential tourism development proposal currently at the design stage (at the time of writing) is being explored in Tongue and the surrounding area. It was highlighted that this proposal may bring a potential 100 jobs to NW Sutherland. A detailed initial masterplan was submitted alongside comments to the online consultation form. The masterplan detailed a series of destination points linked by existing and potential new accesses (roads/ tracks) on the stretch of land between Loch Hope across the Kyle of Tongue, to the settlement of Tongue. Details for each of the destinations is provided as well as outline masterplan-style sketch proposals for Tongue that include the sites identified in the MIR as well as additional sites within the SDA, identified over two phases. The need for additional housing to accommodate such an increase in jobs is highlighted, as is the developer's keenness to work with the community and Council on the proposals, and integrate the proposals into the community. The proposals include the refurbishment, upgrading and conversion of various 'destinations, farm steadings, hunting lodges and keeper cottages into high-quality tourist accommodation, working and service buildings, spa facilities and 'hub' buildings. The proposal includes a suite of planning-related proposals including road, tack and public access upgrades, additions, removals and alterations (5025; 5114)

All streets are not identified on map and sites are not identified in clockwise order (italicised is assumed). Why are there two roads at top of map both labelled A838 & no sign of the A836 mentioned in the para below TG04 page 76 (italicised verbatim) (2106)

The introduction should include a clear statement requiring all allocations to connect to public waste water drainage (3115)

Placemaking Priorities

Addition of 'Development should be of a quality reflective of its location within the Kyle of Tongue National Scenic Area' (204)

TG01

Customer highlights that their house is incorrectly included within the site. Raises issue with surface runoff, wastewater arrangements and suggests limited electricity supply (4694). Parts of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA

and no new development should be located in the area shown to be at risk of flooding (3115)

TG02

Some customers unsupportive of development on the SW part of site adjacent to Varrich Place. Suggest the portion of the site north of Varrich Place as alternative for development. Concern over impacts on residents' views. Alternative site uses have been submitted in addition to customers' comments, these are to form a viewpoint across the Kyle to Castle Varrich (4685; 4698; 4725; 204)

TG03

Support site and request change of use from housing to mixed use to include business and residential. (3627)

Unsupportive of site for housing use. Suggests change of use to include business (for the specific use of a care home) (5088)

Parts of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding (3115)

Suggest change of use of site from housing to community/ business (assumed) to support use of site for care home (5097)

TG04

Parts of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding (3115) Concerns over road safety and parking if an access is taken to the site from the western part of the A838 raised (5057)

Customer highlights that part of site currently allocated in Sutherland Local Plan; indicated a local car mechanic business is interested in developing on the site; and requests the allocation is carried forward in CaSPlan. The customer provides detailed site description that can be summarised as follows:

Site bound by A838, fire station and a range of fencing and woodland.

Site is steep sloping with a westerly aspect.

Multiple constraints are highlighted: A & B-listed buildings nearby (Tongue House; Tongue Parish Church, Cemetery and gatepiers; Tongue Manse, steading and gatepiers); proximity of site to Tongue House Designed Landscape; potential ecological (Kirkiboll Burn) and archaeological interests that may require survey.

Site access can be taken from both east and west sides of the A838 road, and customer suggests also potential for shared access with fire station site.

Customer also highlights key reasons why the site would be an effective allocation, citing PAN 2/2010 effective sites test:

Land owner willing to release land for development Site not at risk of flooding or ground instability

Vehicular accesses could be provided at upper and lower roads on the site to the required standard.

Slope is an issue, but scope for road-frontage development. Suggests 2/3 along west boundary of site, and 5/6 along east boundary of a density and design in keeping with the settlement.

Customer states that client (landowner of site) is flexible to extent of site for development; type of ownership (private/ affordable/ self-build plots), and type of development, should needs other than housing be identified for Tongue.

Mature vegetation not considered a constraint to developing site, and additional planting could be used to reinforce screening between any new development and the designed landscape to the north (4639)

TG05

Agree with site preference to non-prefer site. Cite potential impacts on qualities of the NSA and natural heritage assets as important reasons for safeguarding from development (204) Agree that part of the site within the SDA is not appropriate for development, due to its contribution to the settlement setting, and agree with non-preference of part of site outwith SDA, but highlighting that development on that part of the site should still be considered under Highland-wide policies (4639)

'No Reference'

Customer refers to the playing field south on Tongue Primary School, agreeing that the land should remain in the SDA boundary and accepting the land should remain undeveloped open space (4639)

Interim position agreed by Area Committee:

Tongue's strategic location and sensitive heritage assets were central in developing the MIR Placemaking Priorities. A major new tourism development proposal highlighted through the MIR consultation emphasises the need to ensure sufficient land for housing and services, and to consider how to manage growth in relevant areas. Concerns were raised from residents neighbouring TG02 about potential impacts to amenity, and loss of a key view and informal access, it is recommended that this site's boundary be revised to exclude the part west of Varich Place. Site TG04 was preferred as an alternative given its sensitive location, but it is now considered that this site be included in the Proposed Plan as two sites, the western part north of the Fire Station for business and community uses, and the rest of the site for housing. It is recommended that uses for site TG03 include housing and business. Sensitivities of the settlement in terms of landscape and heritage assets are recommended to be addressed through developer requirements. It is also recommended that Melness is included as a Growing Settlement in order to effectively support growth and development.

Recommended Council response:

As per interim position outlined above, subject to the following:

General

Mitigation identified through the SEA Environmental Report is carried through to the Plan as developer requirements for sites.

TG01

The site boundary has been amended to reflect the developable area of the site.

TG04

The site has been divided. The eastern part is identified for longer-term housing use. The western part, north of the fire station is allocated for business and community uses.

Melness

Melness is now included as a growing settlement.

Issue 7: Wick

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Wick		
List of respondents (including customer number):			
Gordon Johnson (4679) Robert Cormack (5020)			

	Robert Connack (3020)
THC CPAM Team (3627)	Jill Smith (5045)
Elspeth McLeod (4727)	WM Sinclair (5053)
CliveTeuchert (2023)	NDA Properties Ltd (5128)
Michael Smith on behalf of MM Miller	A Crowe (5104)
(2125)	Mr and Mrs Paterson (5106)
John Cormack (2106)	Historic Scotland (4616)
SNH (204)	SEPA (3115)
Crown Estate (4836)	Bill Mowat (1365)

Summary of the comments received:

General

Investment required to improve the key entry points into the town to make it more attractive to visitors (4679)

The level of dereliction of buildings and walls is a problem and detracts from the image of a thriving community (4679)

The choice of Wick as the operations and maintenance base for the Beatrice offshore wind farm should be acknowledged under SDA section for Wick (4836)

Respondent questions whether now is the time to reconsider the inclusion of a bypass of Wick. Reasons given include the growth of the energy industry in the Pentland Firth and Orkney Waters. Every other town along the A9 has now been bypassed with the except of towns and villages in Sutherland and Caithness. (1365)

WK04

There should have been a reference to the National Nuclear Archive and its employment opportunities; and also the potential tourism potential of the local Caithness Archive which will be housed in the same building. This is a major asset not being properly exploited by Highlife Highland. (4679)

This is the site of the nuclear archive centre (2106)

Supportive of preferred status (3627)

Council bin lorry depot and recycling area (2106)

Support preferred site in the MIR both the retained industrial and business allocation from the Caithness Local Plan and the addition of community uses identified in MIR. Respondent highlights that a planning application has been lodged for the NDA (Nuclear Decommissioning Authority) Archive facility which includes the erection of a new building, formation of parking/access and landscaping. The proposed development is of a particularly high quality that looks to utilise a vacant brownfield site which will make a significant contribution to the local economy and create a number of jobs in the area. The proposed NDA Archive reflects the emerging land use allocation for the site. Specifically, the preferred uses at the site as identified in the MIR enables the proposed development which will be beneficial to Wick and the wider area. (5128)

WK05

Supportive of preferred status (3627)

WK06

Playpark and coastal paths (2106)

WK07

Concerns over feasibility of proposals, reasons 'for building on a sunken ammunition ship' and other harbour constraints including site deposits and vulnerability to south and east winds. (2106)

WK07 is an amalgamation of the existing harbour area in the NW, a disused quarry in the SE, and an intervening strip of coastal land joining these sites. This central strip of coastal land would appear to have some amenity value, with footpaths, and is zoned for Amenity in the current Caithness Local Plan. It is unclear what is intended for this part of WK07, and it may be no more than to provide access between the harbour, the quarry area and perhaps WK06. If the whole of WK07 is taken forward to the Proposed Plan as an Industrial harbour-related allocation, it should provide for the maintenance as much as possible of the amenity value of the area between the lifeboat slipway and the quarry. (204)

Much of WK07 is at risk of flooding from the sea. Developer Requirement for (1) harbour related developments only and (2) FRA to inform layout and design. (3115)

WK08

Supportive of preferred status (3627)

WK09

Respondent uncertain as to what is planned for the site. However they object to it being allocated for industrial uses as there are noise issues, particularly at night. (4727)

Site should have regard to the watercourse running through/adjacent, e.g. it can form a component part of a green network here (204)

Part of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no development should be located in the area shown to be at risk of flooding. (3115)

WK10

The site should be called 'The Shore' not 'Shore Road'. (2106, 5020)

Part of the site may be at risk of flooding from the sea. Developer Requirement for a FRA and no new development should be located in the area shown to be at risk of flooding. (3115)

WK11

Supportive of preferred status (3627)

Area built on pure sand and respondent questions what will happen when global sea levels rise. (2106)

Part of the site may be at risk of flooding from the Wick River and the sea. Developer Requirement that (1) areas of development adjacent to the coastline will require an FRA and no new development to be located in any areas shown to be at risk of flooding. (3115)

WK12

Supportive of preferred status as this gives greater flexibility in finding a future use for the site (3627)

Respondent recommends that the Council purchases the land for the expansion of the cemetery which is 90% full. (2106)

Part of the site may be at risk of flooding from a watercourse. Developer Requirement for an FRA and no development should be located in the area shown to be at risk of flooding. Cemeteries can have a detrimental impact on groundwater. Their acceptability, including the potential location and scale of development at a site, can be assessed only following intrusive ground investigation. In the absence of such information, SEPA reserve position on the acceptability of this extension. If no further information is provided a Development Requirement should be attached requiring intrusive ground investigation to be undertaken in line with SEPA's Groundwater Protection Policy (or Cemetery Guidance, if it is published by then) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for an extension to the cemetery due to an unavoidable impact on groundwater. (3115)

WK13

"West of Green Road East of George St and including old abbatoir" (2106)

Respondent states that "WK 25 is described as being North of Green Road, the nearby North point on the plan clearly shows this to be totally wrong. The site shown lies to the West and North West of Green Road". (It is assumed this refers to WK13) (5020)

WK14

Supportive of preferred status (3627)

WK15

Supportive of preferred status as this gives greater flexibility in finding a future use for the site (3627)

WK16

Not much ground left after new children's home put up in 2014. (Council) car park too big. (2106)

WK18

East/south half is a bog and needs complete draining (2106)

SEPA note that the ER identifies that WK18 is in an area of blanket peat coverage. The mapbased and photographic information SEPA hold does not suggest this is the case. If this is the case then a Developer Requirement should be included requiring (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed. (3115)

WK19/20/21/22

Approx a mile from the town centre. (2106)

WK20

Part of the site may be at risk of flooding from a watercourse. Developer Requirement for a FRA and no development should be located in the area shown to be at risk of flooding. In addition, to protect existing water users of the nearby watercourse we also request Developer Requirement text highlighting that discharges to this watercourse are unlikely to be acceptable. (3115)

WK21/22

Site should have regard to the watercourse running through/adjacent, e.g. it can form a component part of a green network here (204)

Part of the site may be at risk of flooding from a watercourse. Developer Requirement for a FRA and no development should be located in the area shown to be at risk of flooding. In addition, to protect existing water users of the watercourse we also request a Developer Requirement for an

enlarged buffer to the watercourse (we recommend 20 m) and text highlighting that discharges to this watercourse are unlikely to be acceptable. (3115)

WK22

Supportive of preferred status as this gives greater flexibility in finding a future use for the site (3627)

North West corner has mill lade through it built by Thomas Telford. Concerns over whether it is a Listed building. (2106)

WK23

Concerns over proximity to waste water treatment plant. (2106)

Part of the site may be at risk of flooding from the sea. Developer Requirement for an FRA and no new development should be located in the area shown to be at risk of flooding. (3115)

WK23/WK27

Objects to further housing development at WK27 and WK23 due to significant growth in population (quotes a report by THC that Broadhaven was the fastest growth in any of the Highland wards of "26% growth") but there has been no investment in infrastructure or facilities. The increase in population has resulted in increased levels and speed of traffic in the area. Respondent states that there have been two fatal road accidents and several serious incidents since they have lived there with one car crashing into their garden. Requests for traffic calming measures have been refused by the Council for reasons that it was a bus route and it was a clearly marked 30mph area. The respondent claims Broadhaven Road has become a racetrack and that immediate action is required to address the problem. The elderly residents of the care home and other vulnerable residents are at risk when they are out walking in the area.

There is also a lack of greenspaces in the area for residents and visitors. Respondent emphasises that green spaces and networks benefit communities as they enhance quality of life and sense of place, benefiting wildlife and biodiversity ensuring Wick is an attractive place for people to visit, live, work and bring up their children. There are no children's playparks close by with the only playing fields at Hillhead School which is due to close meaning there will be no assistance for crossing the road. Children often play on the street and along the cliffs and shore at North Head.

Respondent states that the land at North Head is becoming increasingly more instable with paths and fences being eroded away. Serious considerable is required to determine whether it is suitable for increased population in this area.

WK23 is not suitable for children's play area due to the proximity to Waste Water Treatment Plant which emits odours despite being assured that it would be odourless.

There is a covered broch on WK27 which is an important historical site and is not suitable for housing development. It should be developed for recreation and tourist purposes instead. There is also opportunity to develop archaeology, active travel routes and coastal walks along Noss Head, with Sinclair and Girnigoe castles, Staxigoe Harbour and Sandigoe beach.

A more suitable/sustainable approach would be to redevelop brownfield sites in more central locations such as the town centre and Pulteneytown as these areas are close to existing amenities and transport and not contributing to urban sprawl. This would also help increase footfall in the town centre and enhance its vibrancy and sense of community. (5045, 5104, 5105, 5106)

WK24

Supportive of preferred status (3627)

Site is already partly developed. (2106)

This allocation contains the scheduled monument The Pap, broch 350m E of Hillhead (Index no. 578). In light of the restriction placed on the allocation by the mitigation outlined in the SEA we would recommend that the allocation be redrawn to exclude the monument and proposed 20m buffer. Any proposed development would still have to consider the potential impact on the setting of the monument. (4616)

WK25

"West of George Street and South of Robert Street" (2106)

WK26

No connection to public sewer network available (2106)

WK27/WK28

Landowner of the site is supportive of it being in the Plan as there are no issues as with wildlife conservation, flooding, drainage, road access and it would round off the existing boundary. (2023)

WK29

No connection to public sewer network available. The east section (the lower glebe) is used for Caithness county show and the field to west of lovers loan is used as stock pens for same (2106)

Support non-preference of WK29 as it is partly located within and may impact on the Lower Wick River SSSI. (204)

WK30/31

"Agricultural land" (2106)

SEPA note that the ER identifies that WK30 is in an area of blanket peat coverage. The mapbased and photographic information SEPA hold does not suggest this is the case. If this is the case then a Developer Requirement should be included requiring (1) Peat Management Plan showing how disturbance of peat has been minimised and how peat will be managed on site (2) Vegetation survey to demonstrate how impacts on wetlands have been avoided. It should also be noted in the text that these issues may affect the area of the site which can be developed. (3115)

WK32

Site name should be 'West' of Police Station not 'East'. (2106, 5020, 5053)

Site cleared for housing but there was no demand for the houses so never built. (2106)

Landowner highlights that planning permission was gained for 8 houses in 2006. It is an infill site, close to the town centre and would benefit from being developed for housing. Plans to develop the site have been delayed due to the economic downturn however the economy is showing signs of improvement and they now intend to submit fresh plans within the next 18 months. Landowner requests that the site is carried forward in the Proposed Plan for housing. (5053)

WK33/34

"Agricultural land 1 mile from town" (2106)

Sites at Staxigoe and Papigoe (WK35, WK36, WK37) The land at WK36 is not suitable for housing as it gets boggy in wet weather. It has potential as a nature site with ponds and low shrubs and extending to include the adjoining cliffs. (4679)

Respondent wishes to see the land at Elzy Farm, Staxigoe between Moray View Avenue and Pilot Place, Papigoe to be allocated for residential development. (2125)

Queries why the sites were not on the map. Agricultural land. (2106)

Interim position agreed by Area Committee:

The Wick Charrette which was carried out in 2013 focused mainly on the town centre, Pulteneytown and the harbour area. Where possible the outputs are reflected in the preferred strategy in the MIR. In the existing local plan large scale housing expansion was envisaged to the South West of the town. Although several of the sites have planning permission and part built-out the strategy in the MIR aimed to round-off the town rather than expand it in one direction. New housing sites which were suggested to us at Call for Sites at Broadhaven and at Thurso Road each have merits and were considered as suitable for development. However, due to the oversupply of preferred housing land it is recommended that these sites are not taken forward as allocated sites but identified as 'longer term potential'. The remaining sites will be largely taken forward as shown in the MIR.

Recommended Council Response:

General

Where appropriate, Mitigation identified through the SEA Environmental Report will be carried through to the Plan as developer requirements for sites or as placemaking priorities for settlements. Where appropriate and still relevant, any developer requirements or development factors for allocations in the current Caithness Local Plan will be carried forward.

We recognise that the level of dereliction in some areas continues to be an issue. As part of the Placemaking Priorities we have highlighted the regeneration opportunities of vacant and derelict sites and we have actively tried to allocate these sites with a wide range of potential uses.

We now include reference within the settlement text to Wick Harbour being the operations and maintenance base for the Beatrice offshore windfarm and the opportunities which this provides to the area.

Sites

WK04 - Land S.E. of Wick-John O Groats Airport

At the time of the MIR it was not fully confirmed whether the nuclear archive centre was going ahead. Since then the planning application has been approved and initial work has commenced. We are therefore referring to the development in the site allocation and promoting the potential benefits in the Placemaking Priorities.

WK07 – Wick Harbour

The land along the south head has historically been used for industrial purposes, e.g. harbour related, quarries and landfill. Although investment has been made to improve the path network it continues to look like an industrial area and be used for industrial. The storms over the past couple of years have also damaged parts of the path network. As a result the impact of redevelopment of the area is not considered particularly significant. Nevertheless a Developer Requirement would be added to ensure that core paths along the coast are retained in some form.

Developer Requirements also added for a Flood Risk Assessment (FRA) to be carried out and that no development should be located in areas shown to be at risk of flooding.

WK09 – Old Pulteney Distillery

The site was included as some other distilleries were allocated for industrial uses in the Inner Moray Firth LDP. This was to support the principle of distilleries to expand their operations if needed. As Old Pulteney distillery did not suggest the inclusion of the site, neither did they make comments to the MIR consultation it is considered that the allocation is not required. As a result we are recommending that the site is not carried forward to the Proposed Plan.

WK10 – Land at The Shore

Developer Requirements added for a Flood Risk Assessment (FRA) to be carried out and that no development should be located in areas shown to be at risk of flooding.

Site name to be changed to Land at The Shore.

WK11 – Lower Pulteneytown

Developer Requirements added for a Flood Risk Assessment (FRA) to be carried out for areas adjacent to the coastline and that no new development should be located in areas shown to be at risk of flooding.

<u>WK12</u>

Developer Requirement will be added for an FRA and that no development should be located in the area shown to be at risk of flooding. An additional Development Requirement will be attached requiring intrusive ground investigation to be undertaken in line with SEPA's Groundwater Protection Policy (or Cemetery Guidance, if it is published by then) before any development occurs at the site. Suitability for cemetery extension remains subject to detailed investigation which demonstrates that there is not an unavoidable impact on groundwater conditions.

<u>WK13</u>

Site name changed to 'Land West of Green Road'

<u>WK16</u>

Site now built-out and should not be taken forward in the Plan.

<u>WK18</u>

As noted in Issue 2a 'Housing needs in Caithness & Sutherland' the Council has updated its HNDA since the MIR was published. Whilst CaSPlan is based on the 'higher continued growth scenario', for the plan area the sites preferred by the Council exceeded the housing land requirement to a significant degree. As a result we are looking to phase larger sites and identify some areas as longer term. This will leave the option open for future plan reviews to allocate the land if, at that point, additional land is required. It is recommended that WK18 is taken forward as a longer term Housing site as it benefits from being close to existing services and is on relatively poor agricultural land but at present there is currently sufficient land allocated elsewhere.

<u>WK20</u>

Developer Requirements added for a Flood Risk Assessment (FRA) to be carried out and that no development should be located in areas shown to be at risk of flooding. In addition, a Developer Requirement stating that discharges to the watercourse are unlikely to be acceptable.

<u>WK21/22</u>

Developer Requirements added for a Flood Risk Assessment (FRA) to be carried out and that no development should be located in areas shown to be at risk of flooding. In addition, a Developer Requirement for a 20m development buffer from the watercourse and a statement that discharges to the watercourse are unlikely to be acceptable.

SNH comments on the area around the watercourse being part of the green network will be identified within the settlement plan for Wick.

<u>WK22</u>

Mill lade is not Listed but is identified in the Highland Historic Environment Record. Any development would be assessed against Policy 57 of the HwLDP which states that developments would need to demonstrate they would not have an unacceptable impact on the heritage resource.

<u>WK23/WK27</u>

As per the response to WK18 the MIR showed an oversupply of preferred housing land. Although WK23 and WK27 both benefit from being arguably natural expansion sites which could round off the north-east of Wick, there are alternative sites in the town which have greater priority. Many of these already have existing planning permission or are brownfield sites which offer redevelopment opportunities. It is therefore recommended WK27 is shown as a long term housing site but due to

the proximity to the WWTW that WK23 is not carried forward.

The petition letter referred to a Council housing report which indicated that Broadhaven was one of the fastest growing 'Wards' in Highland. However, the report shows that overall Wick Ward fell in population by 4% but within this Ward the area of Broadhaven experienced a growth of 26%. This mainly reflects the increase in housing (approx. 200 houses) which occurred on the south side of Broadhaven Road during the 1990s and early 2000s.

It is recognised that there is a lack of openspace around Broadhaven. It is anticipated that if WK27 be taken forward in the future for housing development that a proportion is protected for openspace provision.

It is recognised that there has been an issue with the speed of vehicles on Broadhaven Road. It is suggested that this could actually be addressed through further housing development which would help to maintain a sense of being within a town rather than at present on the edge. Developer Requirements could also be attached to such a development to ensure that traffic calming measures and possible pedestrian crossing are created on Broadhaven Road. If there is a need in future Plan reviews to allocate WK27 then these issues can be picked up.

Issue 7: Growing Settlements

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Growing Settlements		
List of respondents (in	cluding customer num	ıber):	
Scottish Natural Heritage (204) Jan Thomson-Fraser (4712) Durness Development Group Limited (3618) Altnaharra Estate Ltd (4579) Laid Grazings & Community Committee (5023) Scourie Community Development Company Ltd (5061) Simon Stevens (4676) John O'Groats Leisure Ltd (4689) CLAF & D&CCC (4754) Caithness Horizons (2014)		Bill Badger (5021) lan Georgeson (3368) Bill Mowat (1365) John Swanson (2112) John Cormack (2106) Victoria Mackay (5123) Scottish Environment Protection Agency (3115) Durness Community Council (348) Strutt and Parker on behalf of Balnagown Estates (5115) Creich Community Council (4930)	
Summary of the comm	ents received:		
 General (4579) As long as previously allocated areas in area's not mention in the plan are restricting alternative sites in these locations, for example Altnaharra is not even mentioned in the entire CaSplan, however is a settlement which has a Hotel/School/Church and has recently been expanding, which should be encouraged. SEPA recommends the following general requirements be included for all Growing Settlements: Development should be directed towards areas of the settlement within or adjacent to public waste water drainage infrastructure and there should be a requirement for them to connect; Areas adjacent to the coast and watercourses which may be at risk of flooding should be avoided. FRA may be required. (3115) 			
CAITHNESS			
Dunbeath (204) Add to Placemaking Priorities Avoid any adverse effect on East Caithness Cliffs SPA and SAC or Dunbeath Water SSSI. It is unclear which "old quarry on the north bank of Dunbeath Water" is being referred to in the 4th bullet point, and we assume this is downstream of the SSSI.			
(2014) Dunbeath has suffered greatly from the flyover of the A9, which split the village entirely, and took away much of its former economic viability - Ironically. Resopondent supports the clear statement of protection for the strath and harbour, and hopes that investment might be attracted to reinforce it as a locus for creative and heritage activity, tourism and rural community development. It's designation as a Growing Settlement is important. It cannot afford to become a Forgotten Community.			
Dunnet (204) Add to Placemaking Priorities Avoid any adverse effect on Dunnet Links SSSI			

(4754)

It seems that the already increase of Families within the village boundaries have not been taken into account. For example in the area known as Westside there has been a significant increase of young families in the last 2 to 3 years. As an example the road from Mary Anne's Cottage to the north as accepted 4 new occupied houses with children. To the south the number is two with one occupied by a family. Up the Bank road towards the north the number of families has also increased. The main problem is the road traffic (numbers & speed) with no sign of a path to help protect the increased population.

(2106)

Questions why we state that Dunnet is on the A99/A9 John O Groats to Lands End route.

John O'Groats

(204)

Add to Placemaking Priorities Avoid any adverse effect on North Caithness Cliffs SPA or John O'Groats SSSI

(4676)

No mention of further investment in regards to superfast broadband even though the 2009 masterplan did not take into account that john o'groats is too remote to be supplied by fibre from either Thurso or Wick

(4689)

It is important to make sure that the large free public car park is retained for visitors and not turned in to a development site or a chargeable parking area. It is also very important to make sure that suitable access remains for public transport and tour buses alike to the ferry terminal, taking into consideration the older population that use these services, as sometimes their mobility may not be that good. Consideration has to be made in order to make sure that the pedestrian friendly areas do not impact on the 'end of the road' status that JOG has. Although safe pedestrian areas are required they should not be granted at the expense of loosing the finishing line feeling people currently experience when they arrive here on their end to end journey, which will happen if the current area has planning granted.

(2014)

Supportive of new energy recent development has injected into the profile of JoG, the choice to develop 'high-end' accommodation for it seems a risk. If JoG and Dounreay are to be designated to only economic development areas in Caithness, then a lot of work has to be done to make sure the whole county buys into the idea, and to make sure the benefits JoG enjoys in terms of investment are redistributed back outward to enhance other parts of the county.

(1365)

There is a serve lack of an indoor tourist facility at JoG. John O' Groats is well-known as the most important tourism destination north of Inverness. The recently upgrading/extension of the 1875 John O'Groats House Hotel as the 'Inn at John O' Groats' by Natural Retreats Ltd is highly commendable, while the lodges/chalets surrounding it, are comfortable and appear to be built to a high standard. But the new operator provides year-round work for 30 less people at the 'End of the Road' than was the case there 20/25 years ago.

(5123)

The road and footpath links between Gill and John O Groats need to be improved.

Keiss

(2106) Questions why the station is not on the map.

Latheronwheel

(204)

Add to Placemaking Priorities Avoid any adverse effect on East Caithness Cliffs SAC and SPA

(3368)

The Latheronwheel comment in "Placemaking priorities" of "Focus future development towards the West of the settlement" seems illogical. There are no good existing exits onto the A9 East or West. However a development to the East of the existing settlement would remain with an area of the main "body" of the village whilst support existing services and community facilities more naturally and allowing a new junction to be made East of the main existing village entrance which would provide much safer visibility splays than any existing junction.

(2106)

States that there is not a footpath between Latheron and Latheronwheel.

Reay

(204)

Add to Placemaking Priorities Avoid any adverse effect on North Caithness Cliffs SPA or Sandside Bay SSSI

Watten

(204)

Add to Placemaking Priorities Avoid any adverse effect on Loch Watten SAC/SSSI and Caithness Lochs SPA Pending the Habitats Regulations Appraisal of the plan, we advise that the third bullet point should be amended to - Protect the setting of Loch Watten and improve recreational facilities and tourist appeal, subject to no adverse effect on its site integrity as SPA, SAC and SSSI.

(2112)

The field south of Watten Hall was previously entered for phased development (mixed development and amenity area). Landowner notes that the hall committee has approached them for land to extend the car parking area and landowner feels it would be to the benefit of the community for this to be taken forward to the new plan. There is also a gap site (1 residential plot) north of Henderson Square which could also be included.

SUTHERLAND

Bettyhill

(204)

As well as quoting the SLA under Placemaking Priorities we would like to see Kyle of Tongue NSA specifically mentioned (given that landscape designations to the west and east• are referred to beforehand). Therefore the 2nd bullet point should be amended to "Ensure future development is sensitive to Kyle of Tongue National Scenic Area and Farr Bay, Strathy and Portskerra Special Landscape Area".

(4579)

All 3 area's should be supported and encouraged to develop, compared to concentrating development on the East coast, I/e Sutherland should be more centralised, at Lairg for example

(3115)

Development should aim to avoid any areas of good quality peatland or deep peat. This may have to be demonstrated by way of an appropriate survey. Durness

(204)

Add to Placemaking Priorities Proposals must ensure no adverse effect on the integrity of Durness SAC or SSSI.

(4712)

In 10 years respondent has seen Kinlochbervie and Durness decline in many ways. There are few jobs to keep people here, the housing stock is in decline and there is little or no transport to get people to and from jobs. The biggest change has been the approval of windfarms locally, many of which are awaiting a final decision. This part of the county is being held back and as such is in decline. The CASPLAN means nothing to these areas unless the local economy improves, the houses will not be needed if there are no jobs. There needs to be an infrastructure of transport to let people get to work easily and also to attract and keep employers here.

(3618)

The proposal for a harbour development on the West shore of Loch Eriboll is for a combined Commercial and Leisure facility (not purely recreational as stated in the plan). There is a need for further development of the core path network to link the hamlets to encourage more activity, green transport and tourist activity. Loss of services and jobs within an isolated rural setting such as Durness would be devastating for the community. Durness (parish) has been identified as a fragile area, nothing has changed, it is still fragile. The biggest export is the young people that leave and do not come back. The influx of retirees does not compensate for the loss of the young people. Maintaining the existence of the primary school is pivotal for the future survival of this village. Even the loss of part time positions here in Durness will have a dramatic impact on the resilience of the community. Transport and road links are vital. Winter gritting is barely adequate as is. The proposal to reduce this further is unacceptable and may well result in injuries or fatalities.

(5023)

We completely support the "recreational harbour facility" on Loch Eriboll is listed on page 79. A more general point was made under this heading - the amount of land lying dormant there is - and in this respect the Plan should surely strongly support the Crofting Commission's efforts to free this up and also try and create more new crofts.

(5021)

"Re Oldshoremore, Cape Wrath and Durness - excellent - keep expanding."

(348)

Durness Community Council wholeheartedly support the plan for a Harbour in Loch Eribol, although it should be noted that the harbour will be for commercial as well as recreational usage.

(3115)

Development should aim to avoid any areas of good quality peatland or deep peat. This may have to be demonstrated by way of an appropriate survey.

Embo

(204)

The 5th bullet point under Placemaking Priorities should also refer to Loch Fleet SSSI.

Invershin

Does not feature as either a Settlement Development Rea or a Growing Settlement. It is not clear what practical difference this will make but it does seem a startling omission compared to some of the settlements on the north and west coasts that are include. Suggest that it is included as a Growing Settlement with its own issues and priorities. (4930)

Kinlochbervie

(4712)

In 10 years respondent has seen Kinlochbervie and Durness decline in many ways. There are few jobs to keep people here, the housing stock is in decline and there is little or no transport to get people to and from jobs. The biggest change has been the approval of windfarms locally, many of

which are awaiting a final decision. This part of the county is being held back and as such is in decline. The CASPLAN means nothing to these areas unless the local economy improves, the houses will not be needed if there are no jobs. There needs to be an infrastructure of transport to let people get to work easily and also to attract and keep employers here.

Rosehall

Object to the non-identification of Rosehall as a settlement. Balnagown Estate/Boccardo SA own land currently allocated in Rosehall which is included in the 2010 HLA and therefore forms part of the Established Land Supply used in calculating the shortfall (informed by the HNDA) to be met through new allocations in this LDP, and enabling the Council to make the statement that there is currently enough land within sites recognised in existing local plans to accommodate the current and future need for new homes. If the site at Rosehall (and potentially elsewhere) is lost, then there would need to be alternative sites allocated to make up the numbers. Alternatively, the settlement boundary and land allocation at Rosehall could be retained in the plan to meet housing need and demand adjacent to the local shop/post office. If Rosehall is to be included as a Growing Settlement we believe the Issues would be that the settlement provides a valued community resource (shop) which should be supported. There is available capacity in the water and sewage systems and at the local schools. The area is popular for fishing, sporting and hill walking. We believe that the Placemaking Priorities would be that development should seek to consolidate built form with low downward emission design street lights with drainage provision that safeguards the adjacent River Oykel SAC. (5115)

Does not feature as either a Settlement Development Rea or a Growing Settlement. It is not clear what practical difference this will make but it does seem a startling omission compared to some of the settlements on the north and west coasts that are include. Suggest that it is included as a Growing Settlement with its own issues and priorities. (4930)

Scourie

(204)

In view of proximity to Scourie Coast SSSI and Handa SPA, we would like to see a Placemaking Priority added as for other settlements (e.g. Melvich, Portskerra) as follows "Any proposed development should have regard to the nearby natural heritage protected areas".

(5061)

Scourie Community Development Company Ltd and Scourie & District Community Council both disagree with the third section of Placemaking Priorities for Scourie, namely ' The land stretching from the Village Hall to the Caravan & Camping site should be safeguarded from development to help retain good croft land...' The land from the Village Hall to the Beach Road is not croft land, and already has been developed with the building of a new Fire Station and an extension to the Church. Future proposed development in this particular area might include a modest Geocentre, a Visitor Centre to co-ordinate the development of tourism across the North West Highlands Geopark as a whole.

ADDITIONAL SITES CONSULTATION

Invershin

Notes recognition of the relevant protected area and other environmental interests. SNH considers there to be potential for development along a strip, the width of one house plot, west of the A837 north of the junction with the A836 towards the cemetery. (204)

Rosehall

Notes recognition of the relevant protected area and other environmental interests. Development close to the River Oykel Special Area of Conservation (SAC) should be discouraged due to the potential for connectivity and therefore impacts on the SAC, and development between the road and the river should have Developer Requirements for mains sewerage so as to avoid impacts on the SAC. (204)

Support the identification of Rosehall as a Growing Settlement. Rosehall has at least one local facility and serves a wider rural catchment and as such we believe that it merits inclusion as a growing settlement as it may be a focal point for development in the area and would be relatively sustainable compared to some other options in the locality. We are happy with the "Issues" identified and acknowledge the local road network as being a feature which could limit the overall scale of development possible. In respect of the "Place Making Priorities" identified, we would highlight that, according to the records of Historic Scotland (see: http://pastmap.org.uk/) Invercassley House is not a listed building. In light of that, we query the status being given to it through the wording of the Policy that development should have regard to its "setting". This is a potentially wide ranging term and affords a level of protection that is not believed to be warranted. The words "...concentration of housing" seems to have been left off the text published for consultation in the last bullet point. (5115)

Interim position agreed by Area Committee:

We intend to carry forward the list of Growing Settlements shown in the Main Issues Report. Some minor changes may be made to the guiding criteria. Following suggestions made during the MIR consultation we consulted on the addition of Invershin, Rosehall and Thrumster to be included as Growing Settlements. Following a generally positive response we recommend that these settlements are included as Growing Settlements in the Proposed Plan.

Recommended Council Response:

As per the Interim Position outline above, subject to the following:

Dunbeath

Key natural heritage assets are highlighted in the Placemaking Priorities. The need to capitalise on opportunities for economic growth and development is outlined.

Dunnet

"Avoid any adverse effect on Dunnet Links SSSI" has been added to Placemaking Priorities

Dunnet is on the National Cycle Network and this forms a route which many people use when travelling the John O Groats to Land's End journey.

John O'Groats

The Council supports the general principle of making the site more pedestrian friendly. However, it is recognised that certain levels of vehicular access should remain. The detail of any particular layout will be assessed at planning application stage.

Added to Placemaking Priorities "Avoid any adverse effect on North Caithness Cliffs SPA or John O'Groats SSSI"

Latheronwheel

Key natural heritage assets are highlighted in the Placemaking Priorities. The reference to directing development to the west of the settlement has been removed.

Reay

Added to Placemaking Priorities "Avoid any adverse effect on North Caithness Cliffs SPA or Sandside Bay SSSI"

Watten

Added to Placemaking Priorities "Avoid any adverse effect on Loch Watten SAC/SSSI and Caithness Lochs SPA"

Pending the Habitats Regulations Appraisal of the plan, the third bullet point has be amended to – "Protect the setting of Loch Watten and improve recreational facilities and tourist appeal, subject to no adverse effect on its site integrity as SPA, SAC and SSSI."

Bettyhill

Key natural heritage assets are highlighted in the introduction and Placemaking Priorities. Opportunities to support growth and development are now outlined and the requirement to avoid areas of good quality peat included in the Placemaking Priorities.

Durness

Key natural heritage assets are highlighted in the introduction and Placemaking Priorities. Support for the opportunity for a community-owned harbour facility is expressed. The issues raised in relation to social and economic fragility in the area are addressed in the Vision and Spatial Strategy of the Plan.

Embo

Loch Fleet SSSI has been added.

Invershin

Following from the suggestion during the MIR consultation that Invershin should be a Growing Settlement, it was included and was part of the Additional Sites consultation.

Kinlochbervie

Issues raised in relation to social and economic fragility in the area are addressed in the Vision and Spatial Strategy of the Plan. Emerging community priorities highlighted recently are now recognised in the Placemaking Priorities.

Rosehall

Following from the suggestion during the MIR consultation that Rosehall should be a Growing Settlement, it was included and was part of the Additional Sites consultation.

Scourie

The need to safeguard key natural heritage features is highlighted in the Placemaking Priorities. The statement to safeguard land from development has been revised to reflect community development priorities, but continues to require that key amenity views are respected.

Thrumster

We agrees with comments made during the MIR consultation that Thrumster should be a Growing Settlement due to a relatively significant amount of development in the area and the range of facilities which exist at present. A set of Issues and Placemaking Priorities have been included.

Melness

Melness is now included as a Growing Settlement in light of emerging proposals for a major new tourist development, and to ensure any development arising from emerging industries can be supported and directed to the right locations. As well as recognising these factors, the need to support the role of crofting, safeguard key natural environment features and to support future opportunities for economic growth and development is recognised.

Issue 7: Economic Development Areas

MIR Issue	What should the settlements in Caithness & Sutherland be like in the future		
MIR reference:	Question 7: Economic Development Areas		
List of respondents (including customer number):			
Caithness Horizons (2014)			
The Crown Estate (4836)			
Bill Mowat (1365)			
Scottish Environment Protection Agency (3115)			
Forestry Commission Scotland (4692)			
Colin Moore (5092)			
Peter Wade (4700)			
Kenneth Nicol (4944)			
SNH (204)			
Cottherand Diadiversity (Crown (1700)			

Caithness Biodiversity Group (4726) Fran Simmons (5130)

Summary of the comments received:

(2014)

If JoG and Dounreay are to be designated to only economic development areas in Caithness, then a lot of work has to be done to make sure the whole county buys into the idea, and to make sure the benefits JoG enjoys in terms of investment are redistributed back outward to enhance other parts of the county. Dounreay - Not much flesh on this skeleton.

(4836)

Under the Gills Harbour settlement development area section, the ferry service running to Orkney has been omitted.

(1365)

Gills Harbour can play an important role in providing protection and a safe haven to those involved in the energy sector in the Pnetland Firth. GHL directors were pleased when the Highland Council recently unanimously agreed to list Gills Harbour as 'A Port for Action' in a marine renewables context. The family-firm of Pentland Ferries Ltd (PFL), has successfully revived the ancient 'short sea route' from here to Orkney by investing many millions of pounds into the upgrades that have essentially transformed Gills Harbour and have produced a modern regular year-round RO:RO service. PFL is planning/ has consent from Marine Scotland for further port upgrades here. The ferry company recently (12.14) received overwhelming (96%) support from the c. 4,500 persons who replied to an electronic questionnaire that asked whether Orkney IC should grant access to Pentland Ferries to Burwick. (Highland's opposite-number Council administers a partlycompleted facility there on behalf of the Orkney population). PFL has publicly offered to complete the Burwick site at the S end of S. Ronaldsay at no cost to the public purse, and to provide (again at no expense to the public purse) a second ship for the proposed new 8-mile sea-route from This will bring Orkney within a 30 minutes sailing-time 'shuttle-service' from/to Caithness, Gills. and potentially allow day-commuting for the first time to what in recent years has become a more prosperous area than Caithness; the latter being entirely out-with day-travel commuting range of All of this could make further demands on facilities at Gills Harbour, where 'booming' Inverness. the private-sector investment by PFL has been very large, by Far North of Scotland standards.

The reference to Gills Harbour as one of Caithness & Sutherland's Economic Development Areas over the coming two decades is very much welcomed. (p. 50 of the CASPlan document). The Council's CASPlan document (P. 50) refers to 'limits' of the landward expansion of the Harbour due to steep slopes 'behind' it; but the natural way for this harbour to expand, in common with so many non-estuarial ports world-wide, is laterally along the coastline. It also talks of 'access

constraints', but this is a feature common to all three of Caithness's main harbours. All are constructed at the foot of low cliffs. Gills is the only Caithness port than can offer an 'alongside a deep quay', (with a c. 4 M depth at LAT, 'lowest astronomical tides') tidal-turbine refurbishment/maintenance facility. That can be made to happen at quite a modest cost, if the present breakwater-berth were to be roofed over and have a working 'atmosphere-controlled' engineering-works area included.

(3115)

SEPA are supportive of the approach proposed whereby this area will be developed in line with the Dounreay Planning Framework.

Additional EDA Suggestions

(4692)

The Plan needs to place greater emphasis on the potential of the Georgemas Junction site and its existing and future economic role in Caithness and the moves to increase its use and further its potential as a strategic rail frieght and transport hub which makes best use of the new purposebuilt railhead facility and other infrastructure. The role of the site for marine renewables and rural activities should be reaffirmed but perhaps some of the prescriptive list of developments needs to be refocussed.

(1365)

Murkle Bay could be another flat-land port alternative, much as was envisaged in an earlier Structure Plan, when it was zoned as an oil & gas platform-fabrication site. SNH objections would be likely and, in any case, it is on the 'wrong' (i.e. W) side of the notorious Pentland Firth tide-race known as the Merry Men of Mey.

(5092)

States that there is no mention of Forss Business Park in the Plan.

(4700, 4944, 5130)

Investment in modernising Janetstown Industrial Estate should occur before developing TS01 or TS3.

ADDITIONAL SITES

Forss Business and Technology Park

(204)

SNH advice is that any development here would need to consider the known use of the site by geese connected with the Caithness Lochs Special Protection Area (SPA). Development would also need to ensure the maintenance of the Scottish Primrose (Primula scotica) population found in this location. This plant is nationally scarce and endemic, only found in the Orkney islands and the northern coast of Caithness and Sutherland.

(4726)

Primula scotica can be found on the headland immediately west of the Forss business & technology park and the site would need to be surveyed for this plant prior to development west of the current site.

(4944)

This is unlikely to provide support for the decommissioning of Dounreay and the growth of the renewables industry. History has shown that any company supporting Dounreay which has been based here has relocated away to other locations. Development should be focused in Thurso close to Scrabster (marine renewables) or on existing business parks to make them sustainable and vibrant rather than a scatter gun approach.

Murkle Bay

(4726)

Murkle Bay is a beautiful site and is a relatively undisturbed shoreline which is valuable for biodiversity. Scheduling for development here would be inappropriate.

(4944)

There is no justification to carry this forward. Marine renewables is not developing at the pace originally thought. There is only one developer working in the area (MeyGen). Significant investment has and continues to be put into Scrabster as a marine renewables base. Any development here will impact on tourism in particular to surfing / kayaking / watersports.

Janetstown Industrial Estate

(4944)

Support the inclusion of Janetstown as an Economic Development Area (assumed).

Georgemas Junction

(3636)

Transport Scotland would welcome early discussions on proposals at this location which is adjacent to the A9 trunk road and could have road and rail impacts depending on scale and nature of use.

(4944)

Supportive of developments related to freight. The area should not be developed for biomass due no infrastructure and a close by residential area. It will also impact on tourist development which is being developed in the area (e.g. walks).

Interim position agreed by Area Committee:

The MIR identified Dounreay and Gills Harbour as the Economic Development Areas. Other sites were considered as part of the Additional Sites and Issues consultation including Forss Business and Technology Park, Georgemas Junction, Janetstown Industrial Estate and Murkle Bay. We suggest that all are carried forward to the Proposed Plan with the exception of Murkle Bay due to potential environmental impacts and the lack of developer interest over the past 40 years it has featured in successive development plans.

Recommended Council Response:

As per interim position outlined above, with the following additional comments:

As part of the review of the HwLDP there is now a desire to move all site specific content currently within HwLDP to the area LDPs. Consequently Seater Waste Management Facility has also been included as an EDA with relevant Issues and Placemaking Priorities identified.