

# Coastal Development Strategy - Consultation Report

Section	Organisation	Comment	Response
General Comments	Phillips Aitchison limited	<p>RESPONSE TO THE HIGHLAND COASTAL DEVELOPMENT STRATEGY</p> <p>The use of "Inner Moray Firth" in this document and in the HWLDP Main Issues Report is confusing. One minute it is accurately used to describe an area of sea and coastline. The next it becomes an inaccurate label for a large area of Inverness dormitory hinterland which goes no further north than Tain, and many miles inland. It would be better if the Inverness hinterland were called something else. In any event, the term needs clarification on a map for the Coastal Development Strategy, and to show that it covers the entire coastline as far north as Helmsdale, all of which is classified as of International Importance; and includes the sea area out to a line drawn between Helmsdale and Burghead.</p>	<p>The phrase "Inner Moray Firth" is indicative and widely used, though it does not appear on Ordnance Survey maps or charts. It is normally taken to mean the Beauty/Inverness Firth, the Cromarty Firth, the Dornoch Firth, and the land and settlements adjacent to these. A straight line drawn across the sea between Helmsdale and Burghead is one definition of the outer boundary which has been used from time to time for specific purposes but this line does not follow any clear physical boundary and is essentially arbitrary.</p>
General Comments	HIE Lochaber	<p>We would wish further clarification as to the implications of the coastal designations of developed, undeveloped and isolated, and consultation on this process. We would be concerned if the designations restricted sustainable economic development. The designations should have regard to future opportunities rather than reflecting current land uses, and caution against a potential anti-development designation. When implications of designations are clarified, it is recommended that there is further review and consultation on the locations and appropriateness thereof.</p>	<p>The designations are as per the guidance in NPPG13. The text will be clarified due to subsequent changes in national policy.</p>

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General Comments	HIE Lochaber	It would be helpful to confirm the timescales of the next stages of the process, and whether these allow further consultation. As noted above, there are a number of areas where we would wish to have further detailed discussions.	Noted.
General Comments	Historic Scotland	Part 1: Draft Coastal Development Strategy I welcome the aims of the strategy and the acknowledgment of the issues covered by the strategy relating to the historic environment, particularly in terms of coastal erosion.	Noted.
General Comments	SEPA	We consider that the Strategy is well laid out and easy to follow and have no specific concerns regarding the proposed aims and visions.	Noted and response welcomed.
General Comments	Scottish Natural Heritage	We welcome The Highland Council's initiative in producing a Coastal Development Strategy, and in carrying out the coastal classification recommended in NPPG13. We consider that the strategy could become a very valuable tool, particularly in providing a future link between terrestrial and marine planning, but that in order to maximise its value, further work may be needed to develop certain aspects of the strategy. Our response below sets out some general comments and detailed textual points (many of which have been provided by SNH Area staff) are contained in an appendix to the letter.	Noted and support welcomed.

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General Comments	Scottish Natural Heritage	<p>Whilst the coastal classification will be a useful guide to assist in strategic planning, we are not convinced that the strategy has been entirely effective in setting out the Council's vision for Highland's coastal areas. We consider that there are some notable gaps in the strategy, which surprisingly have not been highlighted through the SEA process. Whilst the strategy does describe the major issues affecting Highland coastal areas, we would have expected more emphasis on setting out strategic policies to address these issues. We are also not clear how the coastal classification maps will be used to inform detailed planning policy. Appendix 1 of the strategy lists the principles contained in NPPG13 on development appropriate to the different classifications, but it would have been helpful to elaborate in the body of the strategy on the extent to which these principles are intended to be applied for the HCDS area.</p>	<p>The national guidance in NPPG 13 has been superseded in 2010 by the consolidated SPP. This no longer requires local planning authorities to classify their coast using the categories of Developed and Undeveloped, though the SPP continues to recognise the category Isolated Coast and its sensitivity. However, many local planning authorities, including Highland Council, have already classified their coast using the NPPG 13/ PAN 53 methodology and the results of this exercise are still relevant as an indication of the overall level of development around the coast. The new SPP states that "development plans should identify coastal areas likely to be suitable for development, areas subject to significant constraints, and areas which are considered unsuitable for development such as the isolated coast". In the Highland context, areas which could be highlighted as suitable for development in the strategic sense will be the coast which was previously classed as Developed and some parts of the coast which were previously classed as Undeveloped on account of a low level of urbanisation but which have obvious strategic development potential (e.g. the north side of Loch Kishorn).</p> <p>Coastal areas which are subject to significant constraints will largely be the remaining areas which were classed as Undeveloped and which have a broad protective designation (e.g. National Scenic Area, AGLV, views from settlements over open water, marine Natura sites) or have infrastructure limitations.</p> <p>Areas unsuitable for development are likely to</p>

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General Comments	Scottish Natural Heritage	<p>It would be helpful if such strategic coastal policies then informed the Highland-wide Local Development Plan HWLDP (and further subsequent LDPs) to ensure that detailed planning policies are put in place to address these issues in appropriate locations and work towards the proposed vision. We note that several major coastal proposals in the HWLDP Main Issues Report (some of which are contained in the National Planning Framework 2) are barely mentioned in this strategy, e.g. A96 corridor developments, Nigg masterplan, development of Scrabster and Wick harbours. This lack of integration also applies to marine renewables which are strongly supported in the HWLDP MIR (particularly in the Pentland Firth) but which receive scant attention in this strategy. The link with The Highland Council's Renewable Energy Strategy is also unclear and there is no reference here to the implications of landfalls for the sub-sea connections to National Grid required for renewable energy developments (mentioned in the MIR but not here).</p>	<p>include coastal areas which are physically unsuited (e.g. because of exposure or topography), Isolated Coast (particularly where it coincides with a protective designation), terrestrial Natura sites and SSSIs.</p> <p>Text amended in several sections.</p>

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General Comments	The Crown Estate	Broadly, we feel that the CDS would benefit from focussing on development opportunities as well as those constraints to development. For example, the CDS represents a point at which onshore but coastal elements of offshore renewables developments in the Pentland Firth could be planned for. This has the potential to anticipate Regional Marine Plans and would therefore be timely and welcome. We are also keen to see greater clarity on the relationship of the HCDS with the HWDP currently in prep.	Text in CDS has been amended to increase clarity of purpose of each document.
General Comments	Moray Firth Partnership	1) The MFP welcomed the preparation of this Strategy, which is important in terms of the Moray Firth area. However, given the importance of the coast and the range of relevant and important issues with this Strategy, there appears to have been a relatively low profile given to the consultation.	Noted.
General Comments	Moray Firth Partnership	2) There is a need in terms of the integrated management of the Moray Firth for liaison with neighbouring authorities on relevant issues, rather than plans being prepared in isolation. The extent of any such liaison or coordination between areas is not apparent and we would welcome further collaboration between all the authorities involved.	Noted.

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General Comments	Moray Firth Partnership	3) There are a number of major plans and proposals affecting the Moray Firth area, including the A96 corridor development, Whiteness, the Nigg Masterplan etc. , which are part of the Highland wide Local Development Plan, that are only briefly mentioned within this strategy. The Pentland Firth Marine Spatial Plan which is currently being developed is not mentioned, although the issue of marine renewables will be one of the key drivers in that area, with the impacts on local roads, harbours and other infrastructure as well as sub sea cabling and other issues. It is not clear therefore how the THC Coastal Development Strategy will inform the LDP and how it will be used to create an integrated vision and policies for the Highland coastal areas.	Text in CDS and HWLDP to be amended to increase clarity of purpose of each document.
General Comments	Scottish Salmon Producer's Association	The report has a readily understandable and practical structure, and clearly defines why the HCDS has been created, and the context in which it should be considered. The Needs and Aims of the HCDS are clearly stated, and are broadly supported by our members.	Noted and support welcomed.

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General Comments	Scottish Salmon Producer's Association	<p>It is noted that the presence of aquaculture does not automatically modify the classification of coastline from Isolated to Undeveloped or Developed category. One member feels 'we should be concerned about this if it will be a reason to restrict further aquaculture development at existing sites or new locations, i.e. it implies a presumption against development'. A further example given is that in Loch Nevis there are a number of aquaculture sites with a medium scale of output and yet the coast is marked as Isolated. One company feels that 'Industry must ensure that this vague classification does not act as a further barrier to future aquaculture development. All existing site leases should be included in the developed category, given that all existing sites are within 3 nautical miles of the coast'.</p>	<p>The noticeable presence of a fish farm is not regarded as an indicator of Developed coast in PAN 53. It is an indicator of Undeveloped coast. However, the classifications are composite and allocation to a given category requires the presence of a number of different indicators. The stretches of coast in Loch Nevis which have fish farms and which have been classified as Isolated have been classified this way because most of the other indicators of Undeveloped coast are not present (e.g. low-density settlements, minor roads/rail/power installations, minor centre of activities) whereas several of the indicators of Isolated coast are present.</p>

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General Comments	Scottish Salmon Producer's Association	<p>A general observation has been that the Nature Conservation section 5.10 has been written in a completely different format than the other Sectors. As a result the HCDS appears disproportionately biased towards Nature Conservation and against other developments in the Highlands. Whereas in the other sections of the HCDS, the sectors are described, and the policies and Framework plans are detailed, with growth or improvement potential described, the Nature Conservation section focuses on how all the other developments in the Highlands are regarded as a problem for Nature Conservation. There are no details given as for the other sections, in terms of describing Nature Conservation, and its value, or plan details, or benefits. The section simply seems to focus primarily on the deleterious impact of everything else. If this is the intent of the detailed sections, then surely the negative impacts affecting the other industries should also be described in the relevant sections, otherwise the approach becomes pejorative and biased.</p>	Each sector section has been written following the format given in the amended text in section 5.0.



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General Comments	Scottish Salmon Producer's Association	<p>To summarise, the greatest concerns we have relate to the influence that the Classification maps and objectives may have on the HCDS, and about the negative connotations and perceptions that seem to persist about aquaculture. On classification, a member points out – ‘The HCDS report suggests Plans should only allow Development in areas classified as Developed. For example, page 56 states “if a coastal location is required for a Development; it should be accommodated in Developed area”.</p> <p>However, the maps clearly show that, apart from Fort William, Lochcarron, Broadford, Portree, Lochinver and Ullapool, the entire west coast is Classified as either Undeveloped, or Isolated. In these Classifications areas (Undeveloped or Isolated) development is not to be encouraged and only considered if proposal yields socio-economic benefits that outweigh any other potential impacts, or there are no feasible alternatives’.</p> <p>The question therefore arises “What scope is there to reconsider the Classification maps to properly reflect the existence of aquaculture developments?”</p>	<p>The CDS does not suggest that development should only be allowed in areas classified as Developed. Page 56 in the draft CDS document was an appendix which set out the Scottish Government’s definitions and policy guidance for the coast as expressed in NPPG 13. This policy guidance has since been superseded by the Scottish Government’s consolidated SPP. For the record, the NPPG 13 guidance said that development which requires a coastal location should generally be accommodated on the developed coast. It did not presume against development on the Undeveloped coast. Rather it set a key criterion for development there – it should yield social and economic benefits sufficient to outweigh any potentially detrimental impact on the coastal environment. On the Isolated coast NPPG 13 said there should be a presumption against development.</p> <p>The indicators used for classifying the coast cover a number of different factors, not just the presence or absence of fish farms. It is a composite classification which broadly indicates the overall level of development along the coast and it takes fish farms into account.</p>

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General Comments	RSPB	Highland Council is to be commended on undertaking to develop such a Strategy as Supplementary Planning Guidance to the upcoming Local Development Plan. The general thrust of the Strategy, in terms of promoting sustainable development and setting a strategic planning framework is welcomed. On the whole, we consider it a very thorough and balanced document.	Noted and support welcome.
General Comments	Dunnet Head Educational Trust	2. The LDP and the Coastal Development Strategy should be consulted together when plans for new development are submitted to the planning department.	Noted. As the CDS will form supplementary guidance, this is the intention.

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General Comments	Jones Lang Lasalle	<p>A matter that is not clear from the draft Coastal Development Strategy is the planning status that it will have once formally approved by the Council. THC website notes that the Coastal Development Strategy will become a part of the LDP that is currently being prepared; however, the Coastal Development Strategy indicates that it will be a non statutory supplementary document to the LDP. Should the Coastal Development Strategy become part of the LDP, we suggest that it would be appropriate for the Coastal Development Strategy to be progressed as Supplementary Guidance (SG) which would give the document Development Plan status when considering developments down to the low tide water mark.</p> <p>Considering the importance of the coastal zone and the potential increasing interest in development arising from the marine renewables industry, we recommend that there would be distinct benefits in progressing the Coastal Development Strategy as SG. This would give the document greater status and weight as a planning policy document. The timescales for preparation are also generally in line with the LDP process which would allow the spatial strategy of the LDP to develop and be consistent with the policies within the Coastal Development Strategy. However, we strongly recommend that any matters that would affect the spatial strategy of the LDP be fully contained and detailed within the LDP itself as opposed to solely within SG or supplementary policy statements.</p>	Noted. Text in section 1.1 amended to indicate that the CDS is intended to provide supplementary guidance.

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General Comments	Jones Lang Lasalle	<p>It will also be particularly important for the Coastal Development Strategy to respond to the National and Regional Marine Plans as and when they come into force. The Marine (Scotland) Bill was introduced to the Scottish Parliament on 29 April 2009 and passed Stage 1 on October 2009. The Bill is therefore at a reasonably advanced stage in the Parliamentary consideration process. Among other matters, the Bill provides the statutory framework for the Scottish Government to prepare National and Regional Marine Plans, where National plans will provide the policy framework to meet international and national objectives and those objectives of a regional nature will be met by regional planning. Section 11 of the Marine Bill requires that Public Authorities, when granting licences for marine works, or in making other decisions, to have regard to the Marine Plan. It is suggested that this requirement would extend to plans and programmes being prepared by a Public Authority such as the Coastal Development Strategy. In the regard it will be important for the Coastal Development strategy to respond to the National and Regional Marine Plans and to be consistent with them.</p>	<p>Noted. Text in section 1.1 amended to mention the likely timescale for preparation of the national and regional marine plans and the need, in due course, for subsequent editions of the CDS and HWLDP to take these into account.</p>

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General Comments	Jones Lang Lasalle	We recommend that the Coastal Development Strategy recognises that different types of development will have very different locational requirements and that the wider impacts of a development (not just on the coast when considering marine renewables which will potentially have significant onshore supporting development) will require to be considered in the round to establish the acceptability of a particular location for development.	Agreed that different types of development have different locational requirements. Text of subsection 1.1 amended to acknowledge this. The coastal classification is not however based on the technical suitability of different stretches of coast for different types of development. It is based on the extent to which the coast is developed at present and when read in conjunction with national policy and the policies in the HWLDP this will provide an overview of the appropriateness of development generally in different areas.

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General Comments	International Power Marine Developments	<p>It is important that this development strategy is integrated with other emerging plans and programs, inducing;</p> <ul style="list-style-type: none"> <li>· Marine Spatial Plan</li> <li>· Crown Estate marine energy leasing rounds</li> </ul> <p>“The seaward boundary of the coastal zone for terrestrial planning purposes has traditionally been the Mean Low Water Mark of Spring Tides (MLWS)... for the purposes of this study, the landward limit of the coastal zone has been taken as 1 km inland from MLWS”. (Section 3.1, p8)</p> <p>[Referring to NPPG 13] “For statutory planning purposes the limit of the coastal zone in the seaward direction is, at the time of writing, 3 nautical miles. The landward limit of the coast is more difficult to define but can be determined by the geographical effects of coastal processes and coastal-related human activity; it is therefore a zone of variable width”. (Appendix 1 p55)</p> <p>The geographic extent of the policy should be made clear.</p>	<p>The boundaries of the coastal zone can vary widely according to the definition used and can involve a mix of physical, biological and socioeconomic factors. Some marine influences extend far inland and some terrestrial influences can extend well offshore. Other interactions between land and sea and between the activities which take place on them are much shorter in range. 3 nautical miles offshore is an established administrative boundary and represents the current limit of local authority planning powers over marine aquaculture. It has therefore been taken as the indicative offshore limit of the CDS. To provide the basis for the coastal classification as PAN 53 suggested, the landward limit of the coastal zone has been taken as approximately 1 km inland from MHWS. This should also be regarded as an indicative boundary for strategic planning purposes and should not be interpreted too literally.</p>

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General Comments	International Power Marine Developments	<p>“At the time of writing, the Scottish Government has recently consulted on a draft Scottish Planning Policy (SPP) which consolidates and rationalises existing subject policies into one document. For Coastal Planning it considers whether to remove the specific requirement for development plans to classify the coast, but the three types are retained as a general guide to development on the coast”. (p11)</p> <p>Referring to “Scottish Planning Policy –Proposed Policy Changes Consultation” [1] which states on p7: When identifying areas which are appropriate for development, planning authorities should take into account the locational requirements of different types of development, for example ports, marine fish farms and other marine industries, land-based development associated with off-shore renewable energy generation and tourism and recreation related development. Tidal energy is highly location specific, since good areas of tidal resource are only found in certain areas. We ask that this unique characteristic is accounted for in development strategy.</p> <p>Referring to the Scottish Government’s Renewable Action Plan [2] which states under “Specific Actions: Marine Renewables” (p40): Through MESP, facilitate a “deploy and monitor” approach to early marine renewable developments We ask for clarity on how this will be implemented in the development strategy.</p>	<p>Text of 5.12.3 amended to add mention of the fact that only a limited range of sites are likely to be technically and commercially viable for harnessing tidal power at present, however the range of opportunities may widen as the technology develops.</p> <p>At the time of writing, with no formal development proposals yet submitted for marine renewable energy installations in the Pentland Firth, it is not possible to say how the “deploy and monitor” approach will work in practice. However, it does not mean “deploy regardless”. For deployment to be considered sustainable it should be compatible with the existing pattern of interests and the CDS and HWDP will help in guiding this. Consents for offshore renewable energy developments will be granted by the Scottish Government after consultation with local interests.</p>

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General Comments	International Power Marine Developments	<p>“There are four Inshore Fisheries Groups in Highland that aim to improve the management of Scotland’s inshore fisheries and to give commercial inshore fishermen a strong voice in wider marine management developments. The IFGs will develop Management Plans for the North West and the Moray Firth in the next few years. Highland Council will work with these groups to ensure sustainable development of this sector, whilst working with other stakeholders to resolve any conflicts of resource use”. (p17)</p> <p>It is a cause for concern that the North Coast IFG is yet to be constituted. Marine energy developers and stakeholders in the Pentland Firth need to engage local inshore fisheries stakeholders and marine energy development plans need to be in step with IFG Management Plans.</p>	The formation and running of the IFGs is outwith the control of HC and the CDS process.
General Comments	International Power Marine Developments	<p>“Support the introduction of local fisheries management through Inshore Fisheries Groups”. (p40)</p> <p>This requires the inauguration of the North Coast IFG.</p>	Noted, but outwith control of HC.



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General Comments	International Power Marine Developments	<p>“Counter the issues of remoteness, exposure and relatively low visitor numbers by playing to this coast’s strengths. These are unspoilt and distinctive coastal scenery, strong energy infrastructure and potential for harnessing tidal power” (p45)</p> <p>The electricity infrastructure in the north of Scotland is very weak. There is currently no capacity to connect further generation and there is a grid “queue” of 9.3GW [6]. NPF 2 has identified the upgrade of the Dounreay – Beaully 275kV circuit [7] and the Marine Energy Group has called for local reinforcements from Dounreay to north east Caithness [8].</p>	Text of 6.2.3 amended to indicate that the energy infrastructure on the north coast is relatively strong at the Caithness end.
General Comments	Nairn West Community Council	1.The NWCC welcomes the draft strategy which is, overall, a comprehensive and useful document.	Noted and support welcome.
General Comments	Nairn West Community Council	2.It is essential that the Highland-wide Local Development Plan, and the four new regional LDPs, especially that covering the Inner Moray Firth, fully reflect - and are consistent with - the analysis and priorities set out in this Coastal Development Strategy.	Noted.
General Comments	Nairn West Community Council	3. Detailed comments (below) on the text focus mainly on those parts of the draft where specific issues relevant to Nairn and its region need to be addressed or highlighted.	Noted.

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General Comments	Nairn West Community Council	<p>Conclusion</p> <p>24. We hope that the assessments contained in this draft strategy, once refined and agreed, will be fully reflected in the Local Development Plans. The coastal zone of the Highlands is one of the region's prime assets, and the coast and beaches of Nairn are vital to the future of the town and community. It is essential that all proposed development takes full account of this fundamental point. The NWCC would welcome the opportunity to be involved in, and to comment on, further versions of the coastal strategy document.</p>	Noted.
Background	HIE Lochaber	<p>Page 3 Might be appropriate to refer to the major changes imminent from (a) the Water Framework Directive and (b) The Marine Bill - expected to be enacted by Summer 2010.</p>	Noted.
The need for a CDS	HIE Lochaber	<p>Page 3, 1.2 1st bullet - in addition to decline in some communities probably more issues are arising from the growth of others with demands on infrastructure such as water and sewerage with significant implications for coastal water quality.</p>	Noted.

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The need for a CDS	Scottish Natural Heritage	P3. 1.2 We suggest that marine and coastal tourism and recreation should be highlighted in this list, including the need to reconcile pressures on habitats and species that can arise from these activities. This includes formal provision (e.g. marina development and nature based tourism businesses) as well as informal use (e.g. leisure/recreational use).	Noted and text amended.
The need for a CDS	Laid Grazings Committee	As you say in section 1.2 "the main planning challenge here is to sustain the viability of key settlements and encourage diversification in the local economy" - and encouragement of Inshore Fishing and an aquaculture framework, particularly with relation to future developments, should be key elements in this challenge. But not trying to keep the Loch Eriboll superquarry alive since this would purely and simply wipe out Laid.	All reference to superquarry potential removed.

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Aims	Phillips Aitchison limited	<p>Section 2.0 Aims</p> <p>This section states: "the scope of the HCDS is to provide strategic vision and guidance for development on and around the Highland coast i.e. development in the planning sense ..... The HCDS thus provides a classification of the Highland coast which is linked directly to national planning policies but the guidance it offers is largely non-statutory and supplementary to the HWLDP". It seems to us that there is little point in producing this strategy, or in commenting on it, unless the document has considerable weight in framing the policies which end up in the HWLDP. We certainly expect that to be the case. We regret to note the many inconsistencies between this document, the Draft Transport Strategy and the Main issues Report, and it is essential that we see these resolved in the final outputs. We strongly agree that one of the three principal aims of the strategy should be to "guide the sustainable development and use of Highland's coastal zone whilst safeguarding its natural and cultural heritage assets". At the Rural Gathering conference in Perth (25/9/2009), Professor David Freshwater of the OECD pointed out that remote and economically vulnerable areas all turn to tourism as their saviour and said, "you can't all live off tourism. Tourism has to be done well if it is to support your economy".</p> <p>Our point here is that the Strategy needs to recognise explicitly the relationship between economic development and landscape conservation (together with archaeological and built heritage), since these are the key assets which sustain tourism in the North Highlands. Anything which causes a significant detriment to conservation will damage the economic wellbeing of the Far North.</p>	<p>Noted. There are specific landscape designations (NSA and AGLV/ Special Scenic Area) to help safeguard Highland's key landscape assets and landscape is always a consideration in evaluating individual planning applications. The coastal classification has also identified Isolated Coast in Highland which national planning policy indicates should be afforded special protection even if it has no other policy designation. All three of these elements are recognised in the Highland-wide Development Plan and its policies are pitched accordingly.</p>

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Aims	Scottish Natural Heritage	<p>We very much support the stated aims of the strategy as set out in section 2. We recognise that approaches to coastal and inshore planning will need to be reviewed when a marine planning system is introduced in due course (3rd para of section 2). However, we would hope that the HCDS could provide a clear steer on the vision and priorities for different sections of the Highland coast and inshore waters which would help to inform future regional marine planning and would be very valuable in providing an integrated approach between terrestrial and marine plans. We would certainly expect that the HCDS could do more than provide 'baseline information' as stated here.</p>	Support noted; text amended in various sections.

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Aims	Scottish Natural Heritage	<p>We welcome the clarification provided in section 2 on the scope of the strategy and understand that it focuses on aspects relating to traditional built development on the coast or inshore area. There are certain developments at the coast (e.g. marinas, ports) where the main impacts may arise from the use of adjacent waters, rather than merely their physical presence on the coast. It will therefore be important to consider the marine implications of coastal developments, even when these relate to issues like shipping for which the strategy states it will not provide guidance. There has historically been no clear locus to coordinate activities like recreational boat traffic, which is an increasing activity in the Moray Firth and currently the subject of a study by The Moray Firth Partnership. When the findings become available, it will be important for appropriate bodies, including The Highland Council, to work together to coordinate management and minimise impacts.</p>	Noted.

Section	Organisation	Comment	Response
Aims	The Crown Estate	<p data-bbox="584 180 808 204">Specific comments:</p> <p data-bbox="584 248 1234 416">P4, Aims: We note that the aims include to cover the nearshore area as well as coastline. Clarification of this to cover only those issues over which the planning authority has direct control would be useful here – i.e. terrestrial planning, and aquaculture.</p>	<p data-bbox="1301 180 1912 932">As stated in the draft document, the CDS aims to provide a strategic planning framework which is cognisant of the wide range of interests around the coast. It represents supplementary guidance for the Highland-wide Development Plan and does not attempt to provide detailed locational guidance. Thus, whilst only a few types of installation within nearshore waters normally require a consent from the local authority (e.g. fish farms and shellfish farms, works on piers/slips/jetties outwith a designated harbour area), the strategic planning context still has relevance to other types of installation (e.g. renewable energy) or other types of activity (e.g. inshore fishing, tourism and recreation). Similarly, there are certain types of terrestrial activity on the coast (e.g. forestry). which are outwith the scope of statutory planning control. However, their development impacts on the wider environment and community to some degree so should still have regard to the wider planning context and this is what the coastal development strategy provides.</p>

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Aims	Moray Firth Partnership	4) Although it is recognised in Section 2 that the strategy will have to be reviewed once new provisions for marine planning are introduced under the Marine Bill, we would hope that the final Strategy could be enhanced to provide a clearer steer in terms of priority issues for the Moray Firth and other sections of coastline. Rather than just providing "baseline information", the Strategy could form the basis of a more integrated approach that linked marine and terrestrial planning.	Text amended.
Aims	Golspie Community Council	•Aims, Section 2.0: Members support the aim to guide the sustainable development and use of Highland's coastal zone whilst safeguarding its natural and cultural heritage assets, because of the economic benefit which Golspie can derive from tourism.	Noted and support welcome.
Aims	Nairn West Community Council	Section 2: Aims 4. We endorse the objectives of ensuring sustainable development, and of safeguarding natural and cultural heritage assets.	Noted.
Importance of Coastal Zone	Phillips Aitchison limited	Section 3.0 - East Coast In paragraph 2 we would like to see the list of examples containing Dornoch Firth and Duncansby Stacks changed to include Loch Fleet. We will return to this later on, but Loch Fleet is arguably one of Scotland's most outstanding National Nature Reserves, and one of the least well known.	Text amended in several sections.



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Importance of Coastal Zone	Phillips Aitchison limited	Section 3.1 - Methodology for area classification Section 5.2 - Tourism and Recreation In Figure 1, why is National Scenic Area the senior classification for landscape, at the expense of areas of international (meaning greater) importance? This appears to reduce the extent of the area requiring special protection.	NSAs are the Scottish Government's top landscape designation. There are no international landscape designations in Highland as yet.
Importance of Coastal Zone	Nairn West Community Council	Section 3: Importance of the coastal zone  5. We would underline the observation that "the coastal zone is the focus for much of the Highland's economy and recreational activity... and renowned for its landscape and wildlife". This is especially true of the region of the Moray Firth around Nairn. But the same area is under the most acute housing and urban-development pressure. These pressures are described in the paragraphs about the East Coast. We therefore recommend that the coastal strategy document should go further, and state clearly that the qualities of the coastal environment have to be robustly protected and given proper weight in the development-planning process.	Noted; text amended in several sections to further highlight links to HWLDP policy.

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Importance of Coastal Zone	Nairn West Community Council	6. We suggest that the paragraph listing those "areas of the East Coast which are particularly important for their scenic and amenity value" e.g. Dornoch Firth ...the Sutors" should also include the Nairn-Culbin-Findhorn Bay sector of the coast, which is of significance for birdlife, nature and recreation. The fact that this extends into Moray/Grampian should not preclude the development of a holistic and integrated approach to this part of the coast.	Noted and text amended.
Methodology	HIE Lochaber	Pages 8 &12 - Conflicting definitions of the coastal zone - does it run inland from "Mean Low Water Mark of Spring Tides" or from "high water mark"? It is suggested it could be readily established as the seaward limit of local authorities' planning powers (other than for marine aquaculture).	Terrestrial Planning is defined to MLWS whilst marine planning is to HMWS; as per the new Scottish Planning Policy (SPP), the terrestrial and marine planning systems are legally and functionally separate but overlap in the inter-tidal area.
Methodology	The Crown Estate	Classification of coasts: whilst NPPG 13 remains the active guidance, I would note the recent consultation on consolidating SPP, where a proposal to remove 'isolated coast' was discussed. Whilst we have sought to clarify the policy aims of this approach, we would welcome reference to this, if appropriate, in the CDS.	Noted. As the national guidance changed after the draft CDS was produced, the text has been amended to reflect this. The 'isolated' coast has remained in the new SPP.

Section	Organisation	Comment	Response
Methodology	Scottish Salmon Producer's Association	A number of concerns relate to the PAN53 Classification of Highlands as 'Developed', 'Undeveloped' or 'Isolated' and the suggested level of development based on these Classifications. It is suggested that the details of these Classifications is highly important and rather than have that contained predominantly in Appendices 1 & 2 it should be fully dealt with in the main body of the document.	Since the policy elements of the coastal classification which were contained in NPPG 13 are now superseded by the new SPP, it does not seem appropriate to include these in the revised version of the strategy. The classification is still useful however as an indication of the overall level of development and development potential around the Highland coast. The maps therefore remain in the revised strategy document while the details on how they were derived i.e. the PAN-53-based indicators, remain in the appendices.

Section	Organisation	Comment	Response
Methodology	Jones Lang Lasalle	<p>NPPG13 (Coastal Planning) seeks to encourage development on the developed coast, with an emphasis on protecting the undeveloped coast and a presumption against development on the isolated coast. While it is recognised that these are sound planning principles, it should also be recognised that the NPPG was drafted prior to the wider realisation of the offshore renewables potential that Scotland offers, as well as the Government policy, targets and programmes in support of this industry. In this regard, it would be appropriate for the Coastal Development Strategy to include a relevant policy statement detailing the criteria that THC will consider in determining development proposals within the developed, undeveloped and isolated coasts. In drafting such a policy framework it should be recognised that it would be quite possible for either sub-sea electricity transmission cables or marine renewable and offshore wind farm development to require onshore infrastructure to be developed on the isolated or undeveloped coast. Such a requirement may arise for strategic reasons, or simply may be the most preferable location for development in the interest of balancing a number of environmental, economic and other factors, or minimising wider impacts arising from, for example, onshore transmission infrastructure or routing such infrastructure through sensitive areas. Within THC there have already been examples of development in isolated and undeveloped locations as a result of strategic necessity such as the oil rig fabrication facilities formerly located at Loch Kishorn and the still operational NATO refuelling base on Loch Ewe. We therefore suggest that an appropriate policy statement requires to be included within the Coastal Development Strategy that recognises the policy guidance within NPPG13, whilst at the same time addressing the potential requirement for</p>	<p>The national policy position on the isolated coast is a presumption against development to avoid the gradual attrition of this increasingly scarce resource. Development in such areas, even on a very limited scale, could only be justified if it were of over-riding national interest and if binding agreements were made for full site reinstatement at the end of the development's lifespan. Many areas of the Highland coast have however been classified as Undeveloped and where local site and community conditions allow, there is likely to be more justification for development there. The north side of inner Loch Kishorn is an example of this.</p> <p>It would not be appropriate for Highland Council to list criteria for development in the coastal areas classified as "Developed", "Undeveloped" and "Isolated" because this has been done already by the Scottish Government.</p>

Section	Organisation	Comment	Response
		development on the undeveloped and isolated coasts to support the marine and offshore renewables industry.	
Methodology	Nairn West Community Council	7. Within the Methodology section (3.1) we welcome the recognition of the major role of tourism and recreation, which are key elements in the economy of the Nairn area. We recommend that this should be echoed in the HWLDP (which barely mentions these aspects) and in the forthcoming Inner Moray Firth plan.	Comment noted and passed to HWLDP team.
Coastal Population	Scottish Natural Heritage	P 12. 5.1.2 It might be worth mentioning the major housing development proposals along the A96 corridor where the population is set to expand by circa 30,000 over the next 25-30 years. This development will be either within or close to the 1 mile inland limit. The associated infrastructure (water supply and disposal) are particularly relevant for HCDS.	Text amended.
Coastal Population	Scottish Natural Heritage	5.1.2 The sea level rise projections referred to here appear to be severely underestimated (see references in our general comments above). This issue is very important and merits proper cross-referencing to section 5.13.2 and a proper re-evaluation of coastal flood risk in relation to proposed developments.	The text will be amended to reflect most up to date information available, kindly provided by SNH.

Section	Organisation	Comment	Response
Coastal Population	Nairn West Community Council	<p>Section 5: The Coastal Resource</p> <p>8. The point in para 5.1.2 (House building) about the need to consider carefully the impact on the coastal zone of new development, with its infrastructure demands such as sewerage and access, is central to the strategy. This is topical in Nairn and along the A96 corridor, where the adequacy of wastewater treatment and the problems of sewage overflow into the Nairn river-mouth are already matters of concern. We therefore consider that in para 5.1.4 the text should say that decisions on housing development should also take full account of (not just "be informed by") the impact on the coastal resource.</p>	Noted.
Tourism & Recreation	Phillips Aitchison limited	<p>Section 5.2 - Tourism and Recreation</p> <p>Tourism will be a vital feature of the future economy of Sutherland. It is essential that we redress the lazy VisitScotland assumption (supported by the Highland Council's own narrative) that anything of value is on the West Coast.</p> <p>East Sutherland is equally rich in brochs, standing stones, souterrains, hut circles, cairns and industrial archaeology. These are grossly under-promoted.</p> <p>Specific suggestions appear under 6.1 below.</p>	Noted.

Section	Organisation	Comment	Response
Tourism & Recreation	Scottish Natural Heritage	P13 5.2 Tourism and recreation should include mention of golf courses which occupy a significant proportion of the east coast. Dornoch Golf Course has an international ranking sitting just outside the world's top ten golf courses. Other links courses such as Golspie and Brora are of regional importance in terms of their design, history, and economic significance.	Noted. As the CDS is an over-arching strategy document and covers over 3,600 km of coastline, it is not appropriate to mention every facility or activity.
Tourism & Recreation	Scottish Natural Heritage	5.2.1 It is not clear whether tourism employment figures here derive from VisitScotland or Wild Scotland statistics. Could this be clarified?	Data have come from a variety of sources including Visit Scotland and HIE.
Tourism & Recreation	Scottish Natural Heritage	5.2.2 There is scope for further proposals for coastal footpaths/heritage trails – e.g. there has been talk of a Moray Firth coastal trail for some time and there are localised coastal paths identified in the Core Path Plans.	Noted.
Tourism & Recreation	Scottish Natural Heritage	5.2.4 There are examples of proactive initiatives/schemes where development/public bodies and NGOs work with the commercial sector to develop marketing and/or accreditation schemes for tourism businesses. These schemes promote operators that adhere to best practice in terms of their approach to watching and interpretation/guiding e.g. <a href="http://www.dolphinspace.org">www.dolphinspace.org</a> – similar approaches could be used elsewhere and WildScotland could have a key role to play.	Noted.

Section	Organisation	Comment	Response
Tourism & Recreation	Nairn West Community Council	9. The references in para 5.2.1-4 (Tourism) to wildlife, nature-based tourism, walking, sailing and other outdoor recreation - which also includes high-quality beaches such as Nairn, which should be listed as well as Dornoch - further emphasise the need to ensure that development and uncoordinated building projects (para 5.2.2) do not adversely affect the coastal assets and landscape.	As the CDS is an over-arching strategy and covers over 3,600 km of coastline, it is not appropriate to mention every facility or activity. However, the text has been expanded to include further examples of tourist sites.
Tourism & Recreation	Nairn West Community Council	10. The draft recognises this risk (para 5.2.4), but could usefully be more prescriptive on how to avoid the potential conflict. It is very difficult accurately to compare environmental cost and socio-economic benefit (this is comparing apples and oranges - and how do you 'cost' the impact on a landscape?) We recommend that the final sentence should be redrafted to read "Development should be discouraged where there is a risk of significant environmental impact".	The Scottish Planning Policy (SPP) states that coastal areas likely to be suitable for development may contain internationally and nationally designated nature conservation sites" the
Forestry	Nairn West Community Council	11. We think that para 5.4.1 (Forestry) should include reference to Culbin – which is a recreational asset as well as an important coastal forest on the Moray Firth.	Text amended.



Section	Organisation	Comment	Response
Aquaculture	Phillips Aitchison limited	Section 5.5 - Aquaculture We note in Section 5.5.3 the national policy presumption against further aquaculture on the north and east coasts, but we concur with the views of the Laid Common Grazings Committee (see Appendix 2) that some aquaculture development should be allowed in Loch Eriboll. The laid crofting township runs along the shoreline and some form of community owned aquaculture venture could be of great economic importance to the locality.	The national policy presumption is against the further expansion of finfish farming on the north coast. This does not preclude the continuation of finfish farming at its current level in Loch Eriboll and there is no national policy presumption against the expansion of shellfish farming on the north coast.
Aquaculture	HIE Lochaber	Pages 15, 16 Aquaculture - the section ignores shellfish farming, also 5.5.2 and 5.5.3 contradict in claiming that the salmon sector's desire is respectively "more and bigger sites" and "fewer and larger sites".	Text amended.

Section	Organisation	Comment	Response
Aquaculture	Scottish Natural Heritage	<p>Aquaculture</p> <p>We are surprised that the HCDS does not contain more strategic policies for aquaculture. We recognise the important work carried out by The Highland Council in producing Aquaculture Framework Plans, but still feel it would be useful to set out high level policies in this strategy about the types of areas that are considered more or less suitable for finfish/ shellfish farming operations. The HWLDP MIR sets out a preferred option for a general policy on aquaculture, and in our response to that consultation we have expressed a preference for the alternative approach of identifying appropriate search areas, based on constraints such as landscape, ecology or other environmental interests.</p>	<p>If the Council were to flesh out more strategic policies for aquaculture, to be even-handed it would have to do this for all the sectors discussed in the CDS. The Council does not feel it is appropriate to expand the scope of the document in this way because it aims to provide a broad overview rather than a lot of sector-specific detail. Generalisations about the types of areas more or less suitable for certain activities are likely to add little to what has been published already in the form of locational and design guidance and they would add little to what developers already know.</p>
Aquaculture	Scottish Natural Heritage	<p>P16 5.5.3 There is a reference here to the concerns of river proprietors that salmon farming poses a threat to native populations of wild salmonids. This understates the scale of the problem and the level of concern. At the very least it should refer to the impact on the long term conservation of these populations and the impact on their economic value. Perhaps it should refer to the wild fisheries interests rather than river proprietors.</p>	<p>Noted. Text of 5.5.3 amended. See comment below from SSPO: The nature of these 2 comments together suggest that the correct balance has been struck.</p>
Aquaculture	Scottish Natural Heritage	<p>5.5.3 This section should also clarify any differing policy approaches between finfish and shellfish aquaculture.</p>	<p>Noted and text amended. Note that the legal definition of aquaculture includes both finfish and shellfish.</p>

Section	Organisation	Comment	Response
Aquaculture	The Crown Estate	<p>Aquaculture: We acknowledge the value the Council's Aquaculture Framework Plans (AFPs) in addressing, at an appropriate scale, the potential for development in light of other marine uses, conservation interests and the interest of other stakeholders including those of the adjacent terrestrial environment. AFPs should include scope for innovation on the part of potential developers to address the issues highlighted in being able to arrive at proposals that while possibly exceeding the originally anticipated capacity for development, still suitably mitigate the particular concerns present such as to offer an acceptable level of effects. AFPs, in addressing aquaculture potential at an appropriate scale, have tended to work at the individual sea loch scale. We recommend that in seeking to achieve an appropriate balance between development and potentially conflicting interests, a more holistic/over-arching view is also employed, whereby such a balance is sought on a regional scale. The HCDS addresses aquaculture potential on a regional basis and weighting interests with respect to planning recommendations for development should be implemented so that potential limits to broader industry development, as well as to development proposals themselves, be given a regional importance weighting. An approach of this nature will hopefully meet both industry and conservation/stakeholder interest objectives where, whilst inevitable compromises may have to be made at a local level, a balance can still be achieved at a strategic level.</p>	<p>The Council's aquaculture framework plans (AFPs) are not part of the CDS exercise. They are subject to public consultation individually and generally deal with semi-enclosed marine areas which have a coherent identity (e.g. specific sea lochs). The AFPs do not preclude innovation on the part of developers who wish to submit large-scale proposals. Each application is ultimately dealt with on its individual merits. The AFPs merely indicate, as a guide, the maximum scale of aquaculture operation which the Council feels it could comfortably support on a given stretch of coast, taking into account the physical environment and other interests there. Regional as well as local considerations would be factored into any appraisal of large-scale development proposals.</p>

Section	Organisation	Comment	Response
Aquaculture	Scottish Salmon Producer's Association	The document is perceived by all of our members as being either 'overly cautious to aquaculture', or as giving 'no clear suggestion of actual support for aquaculture but plenty of unfounded expressions of problems or conflicts'. A further comment is that 'coastal development seems to be highly conditional in most areas'.	Not accepted that the strategy is overly cautious about aquaculture. The value of aquaculture is stated at several points in the document. The general policy presumptions against the expansion of finfish farming on the north and east coasts are Scottish Government policies not Highland Council policies. Competition between aquaculture and other interests for space around the coast is a fact of life which a meaningful strategy has to acknowledge. Highland Council has done more than most local authorities to reconcile and pre-empt conflicts of interest by production of local planning guidance for aquaculture. Much of the Highland coastline is of high natural heritage value so is inherently sensitive to development. Unconditional support for development in such areas is not realistic.

Section	Organisation	Comment	Response
Aquaculture	Scottish Salmon Producer's Association	It is felt the Aquaculture section at P 15-16 is lacking in substance and is poorly presented in terms of detail, relative to other sections such as Forestry and Tourism. These other sections promote and describe well structured development opportunities, yet the Aquaculture section merely suggests 'refer to Local Plans', which we know are under review but are now very out of date as well as not covering all areas of Highland.	<p>The sections of the CDS which deal with the main sectoral interests, each follow a standard format. They aim to provide a one-page overview which incorporates the following elements:</p> <ol style="list-style-type: none"> <li>(1) description of the activity/interest, its geographical extent and an indication of its significance;</li> <li>(2) relevant coastal planning issues associated with that sector;</li> <li>(3) development opportunities;</li> <li>(4) the main thrust of the Council's coastal planning strategy for that sector;</li> <li>(5) reference to any relevant planning guidance produced for Highland specifically</li> </ol> <p>It is difficult to describe the development opportunities for aquaculture at the broad regional scale without overgeneralising. Most of the good sheltered sites for aquaculture have now already been developed, and in gauging where expansion of existing sea farms may be appropriate, much depends on local circumstances. The Council's aquaculture framework plans, which cover most of the areas in Highland attractive to aquaculture operators, are able to provide this local guidance. They are therefore a relevant reference and provide a level of local guidance which is not, for example, available for forestry. Most of these framework plans date from 2000 or later. The few remaining older plans are either in the process of revision (Loch Torridon, Kylesku/Eddrachilles) or scheduled for revision soon (Lochs Ewe and Linnhe). Comparison with the forestry section in relation to development opportunities is not altogether valid</p>

Section	Organisation	Comment	Response
Aquaculture	Scottish Salmon Producer's Association	Specific reference is made as follows: - 5.5.3 “concerns of river proprietors” must not act as a barrier to aquaculture expansion, credible peer-reviewed science must be considered, not speculation.	<p>because of the much wider range of opportunities available for the development of woodlands. Also, there are different funding arrangements in place for forestry which partly derives from the fact that many woodland schemes deliver significant direct environmental benefits.</p> <p>Similarly, the opportunities for tourism and recreation around the coast of Highland are quite different from those for aquaculture and they are wider ranging. Often the best sites for developing tourism and recreation facilities, even those which relate to the natural and cultural heritage of an area, are within existing settlements.</p> <p>Noted. See comment above from SNH: The nature of these 2 comments together suggest that the correct balance has been struck. Legitimate concerns should always carry more weight in the evaluation of planning proposals than ones lacking in substance.</p>

Section	Organisation	Comment	Response
Aquaculture	Scottish Salmon Producer's Association	5.5.3 suggests development on the west coast should be within the carrying capacity. However, whilst carrying capacity has been highlighted as a theoretical concept no relevant models of carrying capacity have been developed, and no areas have been defined by a specific carrying capacity? Are the MSS-FRS Loch Categorisation methods based on nutrient and benthic indices continuing to be relied upon? If they are, that should be clearly stated. Development would also be “assisted by Council Aquaculture Framework Plans”. Have these been renewed yet? Many were long ago out of date and are not particularly useful for a Planner or a developer when trying to use today. If carrying capacity models or new plans are available, the details of these should be discussed in this section, in the way that available guidance and policies are described in other Sector sections.	<p>Assessments of carrying capacity are not restricted to numerical modelling exercises or solely to biological productivity and waste dispersal. The term is used in the CDS in its broader sense which means assessment of a range of factors to determine the appropriate locations and maximum scale of development for a given type of activity. The MSS-FRS classification of sea lochs based on nutrient and benthic indices is updated quarterly so is not appropriate for inclusion in the CDS.</p> <p>Most of the framework plans date from 2000 or later. The few remaining older plans are either in the process of revision (Loch Torridon, Kylesku/Eddrachilles) or scheduled for revision soon (Lochs Ewe and Linnhe).</p>
Aquaculture	Scottish Salmon Producer's Association	5.5.4 "Council will support development of aquaculture in appropriate areas provided that it is in harmony with other interests and with minimum environmental impact" is far too weak a statement of intent to support the future development of a crucially important sector of the food economy of the Highlands	The Council's primary role in relation to aquaculture is that of a local planning authority which supports the sustainable development of aquaculture and seeks to deliver integrated management of Highland's coastal resources. Such an approach helps to minimise conflicts between aquaculture and other coastal interests and promotes synergy between them. This provides a more stable base for aquaculture development in the long term than an approach which tries to force aquaculture over other interests or sets unrealistic development targets.

Section	Organisation	Comment	Response
Aquaculture	Nairn West Community Council	12. We welcome the presumption in para 5.5.3 (Aquaculture) against further aquaculture projects on the east coast, not just to safeguard wild stocks, but also because of the other Moray Firth priorities of nature and recreation (dolphin-watching, sailing etc).	Noted.
Inshore Fishing	HIE Lochaber	Page 16 5.6 Fishing - refers in its second line to "freshwater" fish which requires clarification. In 5.6.2 it would be useful to confirm if the four inshore Fisheries Groups are yet in existence in the Highland Council area.	Text amended.
Inshore Fishing	Scottish Natural Heritage	5.6 This section should perhaps be titled 'Inshore and Freshwater Fishing'	Noted.



Section	Organisation	Comment	Response
Inshore Fishing	Laid Grazings Committee	<p>Also you will see that in our submission to the Highland Wide Local Development Plan we completely agree with your section 5.6 on the need to encourage Inshore Fishing and shell fish farming such as we have in Loch Eriboll. This again is completely inconsistent with a superquarry with its high volume of shipping whatever folk may try and prove about clean ballast water etc. And this is really where the accent should be put - sustaining existing and developing new kinds of Inshore Fishing and aquaculture. You will remember that we deplored the absence of a quantified framework for present and suggestions for future aquaculture in the Loch Eriboll Aquaculture Framework Plan. And here we would hope that Loch Eriboll would not be included in the "national policy presumption against further aquaculture development on the north and east coasts" (section 5.5.3). This is where the diversity of employment and new development potential lie in coastal development.</p>	<p>The national policy presumption has been decided by the Scottish Government. It is against the further expansion of finfish farming on the north coast and includes Loch Eriboll. This does not preclude the continuation of finfish farming at its current level in Loch Eriboll and there is no national policy presumption against the expansion of shellfish farming on the north coast.</p>
Other coastal industry	Phillips Aitchison limited	<p>Section 5.7.1- Mineral Extraction</p> <p>It was we who drew the attention of the Laid Common Grazings Committee to this section of the draft Strategy, and the Committee has kindly given us permission to reproduce in Appendix 2 the representation which it has already submitted.</p> <p>We could not possibly improve on it and we support it strongly.</p>	<p>Noted.</p>

Section	Organisation	Comment	Response
Other coastal industry	Scottish Natural Heritage	P18 5.7.5 A Masterplan for Nigg has just been submitted to the Scottish Government by THC. It describes the future use of Nigg as being focussed on the fabrication of oil platforms and renewables structures combined with its continued use as a fuel terminal. Not quite sure therefore what the term “multi-activity, multi-user facility” means in this instance.	Several different types of industry, owned by a number of different businesses should be able to make use of the facility for a range of activities.
Other coastal industry	Scottish Natural Heritage	5.7.6 This is an important area and one we have been grappling with in the Inner Moray Firth for the last year or so. Here we were asked to advise on 3 marina developments (Inverness, Avoch and Whiteness). Collectively they would result in around 600 new berths in the Inverness Firth, a key area for the dolphins. In order to inform our advice we commissioned a piece of work from SMRU Ltd to develop a computer model and from this to recommend what the capacity for recreational craft in the Moray Firth SAC might be. They advised that there was capacity for around a further 300 boats in this area, subject to various assumptions and provisos being made. On the back of this we advised THC that after the additional 300 berths had been filled there should be no new berths in the Inner Moray Firth until further data to fine tune the model has been provided and until there is a better understanding of acceptable numbers of boats. There is therefore clearly an issue in relation to harbour/marina development and issues of disturbance to marine wildlife and THC strategy should recognise this – especially in particular areas i.e. marine SACs or key areas for cetaceans, seals or birds.	Accepted. Text of 5.7.6 and 5.10.2 through to 5.10.4 amended to acknowledge the importance of keeping port and marina development in balance with the need to safeguard protected marine species and bird populations.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Other coastal industry	Scottish Natural Heritage	P18 5.7.7. Should also mention Kishorn which has been developed as a link site for timber and fish farm supplies. Also has other potential that needs to be drawn out.	Text amended.

Section	Organisation	Comment	Response
Other coastal industry	Jones Lang Lasalle	<p>The Coastal Development Strategy considers ports, harbours and marinas within chapter 5 and it identifies that a main priority is to maintain the functionality and safe service provision that exists in ports and harbours. The strategy also identifies that there is considerable potential to further diversify port activities. With specific regard to Nigg, the Strategy identifies that there will be opportunity for diversification to support growing wind turbine fabrication for both onshore and offshore wind farms.</p> <p>While SSE supports the identification of Nigg in this regard, there appears to be little information within the Strategy that identifies potential growth within other ports. The importance of Nigg and other ports would not only be for wind turbine fabrication, but also to support wave and tidal renewables development. Nigg is located on the south eastern coast of the THC area and would be well placed to serve offshore renewable energy development interests on the east and north coast. However, Nigg is reasonably remote from the potential marine development areas identified off the west coast of THC, and indeed those located further afield off the Western Isles and Argyll. As such, we recommend that consideration is given to the potential of other ports to serve these locations. We suggest that identification of appropriate ports may be best achieved through developing a port strategy to aid the facilitation of marine renewables development. It would therefore be appropriate not to only progress a development masterplan for Nigg (as identified within the Coastal Development Strategy) but to progress a masterplan for other ports that are identified through the port strategy as being of potential strategic importance to the offshore wind and marine renewables industry (and also to</p>	<p>Comments noted: detail port development issues will be dealt with by the HWLDP and Local Plan process. The Main Issues Report for the Highland wide Local Development Plan suggested major bases/ ports which could in particular have potential roles to play in supporting marine renewables development, namely Nigg, Wick, Thurso/ Scrabster, Kishorn and Mallaig. Since then, and as a separate exercise, the National Renewables Infrastructure Plan (NRIP) has identified a range of sites which offer the potential to help Scotland become an established location for offshore wind turbine manufacturing and construction operations. NRIP highlights that investment in these locations over the next five years is key to growing a globally competitive renewable energy sector in Scotland and ensure other parts of the country can benefit in the longer term. Within Highland, the locations so identified are: Nigg, Ardersier and Kishorn. On-going discussions will inform the identification of first phase priority sites to support wave/ tidal testing. In addition the analysis has identified a medium term list of locations, which for the Highland area adds in Highland Deephaven plus, for wave and tidal, Scrabster and Wick.</p> <p>In addition to the locations identified by the NRIP there may be other ports and harbours which, whilst not prioritised by the NRIP for action and investment at this time, could nevertheless have a role to play in supporting developments in particular locations or specific needs of the industry. For example this might include Mallaig, which lies</p>

Section	Organisation	Comment	Response
		consider biomass as the industry develops).	<p>within an area on the west coast where the NRIP notes further demand for port infrastructure. It might also include Gills Bay, which is acknowledged as part of the existing facilities in the area by the Pentland Firth and Orkney Waters Marine Spatial Plan Framework &amp; Regional Locational Guidance for Marine Energy (Draft Report – 2010).</p> <p>The Council has an Inner Moray Firth Ports and Sites Strategy (2006) and has recently prepared a Masterplan for Nigg. The Highland Renewable Energy Strategy identified scope for a wide range of renewable energy technologies to be developed. The Highland wide Local Development Plan will seek to provide for developments to support the growth of marine and other renewables, promoting the potential roles of ports, harbours and other bases. We will consider supplementing the Plan with Masterplans for those sites where there is a clear need, though in some cases the preparation of these may be developer-led.</p>

Section	Organisation	Comment	Response
Other coastal industry	International Power Marine Developments	<p>“Enhancing the provision for recreational boats and tourism interests is often a key element in this but a holistic approach is required which takes account of both the harbour’s immediate environs and its wider catchment area”. (p18)</p> <p>It is important that this holistic approach encompasses increased vessel traffic associated with the installation &amp; servicing of marine energy devices.</p>	Noted.

Section	Organisation	Comment	Response
Other coastal industry	Laid Grazings Committee	<p>As you can imagine, we are angered by the continued reference in section 5.7.1. to the Loch Eriboll superquarry - "sites for large coastal quarries have been proposed in the past.. .. On the west side of Loch Eriboll, but have not thus far been developed." We are dismayed that, by mentioning it thus, you are still trying to keep this project alive despite - and here we are only repeating once more what we have been saying to you for some ten years or so - the totally negative conclusions of your own £50,000 Durness Coastal Quarry Study in 1994 which were accepted by Highland Council Planning Committee at a meeting on 20th April 1994.</p> <p>Amongst the totally negative conclusions was the recommendation "that no further consideration should be given to the development of any of the rock resources at Durness". This report has been ignored by your services over the years as if it just did not exist and here we go again in August 2009 with the Loch Eriboll site having been "proposed.. .. But not yet developed" with no caveat that it had been totally ruled out by your own study - and a sort of implication that it is just waiting for a developer to come along.</p> <p>We object in the strongest possible terms to this and ask for the reference to be removed. Or at least there should [be] the caveat that your own study has rejected it. An this caveat should not be in the terms that you usually use that there are a few objections of the Report to be overcome. It should make it clear that the proposal was unequivocally and comprehensively rejected on the grounds of insufficient reserves of questionable quality rock and on economic, social and environmental grounds.</p>	Text amended; all reference to superquarry had been removed.

Section	Organisation	Comment	Response
Other coastal industry	Laid Grazings Committee	There is also an inconsistency in the first sentence of section 5.7.1 where it is said "Quarries can .. Provide .. Much-needed resources for roads and building work." Contrast this with the (clearly correct in our opinion) statement in the Minerals section of the Highland Wide Development Plan that "There are unlikely to be deficiencies in supply within the period of this Plan".	Although it may be likely that there will be a sufficiency of supply, this suggest that current supplies, which require ongoing works, are therefore needed.
Other coastal industry	Nairn West Community Council	13. We recommend that the harbour of Nairn should be explicitly included in para 5.7.5-6 (Ports, Harbours, Marinas). It delivers sailing/marina facilities and other tourism opportunities, and the coastal strategy should rightly prioritise both its functionality and its possible enhancement (as in para 5.7.6), which would complement the other recreation and tourism-focused activities of the Nairn area.	Text amended to include Nairn.
Water Quality	SEPA	Section 5.8.1: On first mention you may wish to refer to SEPA as "the Scottish Environment Protection Agency (SEPA)", and "SEPA" thereafter.	Amended as suggested



Section	Organisation	Comment	Response
Water Quality	SEPA	Section 5.8.2: We welcome that reference to flooding is made in the document but query whether a section on water quality and waste disposal is the best place for it. You may wish to consider a separate paragraph on this issue, identifying the requirement for new development to avoid flood risk and be in line with relevant Scottish Planning Policy. Alternatively your section on climate change could identify the current risks of flooding.	Climate change section amended to provide more detail on flood risk.
Water Quality	Scottish Natural Heritage	5.8.1 Water quality is a big issue along the A96 corridor and any new development will discharge into the Moray Firth SAC. SNH have an advice note on suitable water quality standards in areas frequented by dolphins (although Scottish Water are currently appealing against this advice). This strategy could perhaps recognise that the notified interests of coastal and marine designated sites need to be taken into account as part of coastal development.	Text amended.
Water Quality	Scottish Natural Heritage	5.8.1 SEPA River Basin Management Plans should be referred to here.	Text amended.
Water Quality	Scottish Natural Heritage	P19 5.8.1. There should be a reference to the development of a number of schemes by Scottish Water to bring first time sewerage systems to settlements such as Aultbea and Kishorn in order to address water quality failures within shell fish areas.	Text amended.

Section	Organisation	Comment	Response
Water Quality	Scottish Salmon Producer's Association	An important query is raised re 5.8 on page 18, where the CAR Regulations for Diffuse Source pollution are stated as particularly relevant to aquaculture. In fact this is not the case for fish farms, which are regulated under CAR Regulations as Point Source, rather than Diffuse Source, pollution. This is then picked up correctly on page 19, para 2 which states that SEPA monitors Point Source discharges such as sewerage and fish farms.	Text amended.
Water Quality	Scottish Salmon Producer's Association	Furthermore, it should be noted that SEPA not only monitors coastal water quality, as mentioned, but also sediment benthos status. In light of the importance granted to tourism, diving holidays, wildlife, nature conservation , it would be fair to note that SEPA monitors and strictly regulates both water and seabed quality for environmental impact under CAR Point Source Fish Farm regulations.	Text amended.
Water Quality	RSPB	1. Water Framework Directive (WFD) Reference could be made in 5.8.1 to the Partnership working of the North and West WFD Area Advisory Groups, set up and co-ordinated by SEPA, which aim to address waterbody quality issues in Highlands. Highland Council is represented on these groups.	Text amended to include Area Advisory Groups.

Section	Organisation	Comment	Response
Water Quality	Nairn West Community Council	14. Water quality (para 5.8.1-4) is critical, both in the Nairn rivermouth zone and in respect of the more extensive beach littoral. This is vital for health (residents and visitors), wildlife (dolphins and birds) and recreation. Nairn has already experienced problems and failures of waste water treatment and disposal. We believe that para 5.8.2 of the strategy should address the issue of existing capacity, as well as the requirements placed on proposed new developments.	As stated, water quality is largely dealt with by SEPA and detailed comments are outwith the scope of the CDS.
Archaeology	Phillips Aitchison limited	Section 5.9 - Archaeology and Built Heritage It is insufficient just to "support initiatives by Historic Scotland and the Scottish Coastal Archaeology and the Problem of Erosion (SCAPE) Trust to make a systematic record of the archaeological sites on Scotland's coast and to gauge the level of threat to them" As written, this section is concerned solely with conserving archaeology and built heritage in connection with development and erosion. It ignores completely the potential for archaeology based tourism which is, for example, a major source of revenue for the economy of Orkney. It follows therefore that at 5.9.4, there needs to be active promotion of the cataloguing of all such sites with an assessment of their tourism potential, and cross reference to economic development strategy. Such a linkage is well expressed at 5.10.1 with regard to natural heritage.	Section 5.9.3 highlights the importance of archaeology for both tourism and education.

Section	Organisation	Comment	Response
Archaeology	Nairn West Community Council	15. We suggest that para 5.9.3 (Built Heritage) should refer to canals, harbours and the older fishing-port architecture as part of the cultural heritage. The region has some of Telford's finest work. And specific coastal towns and villages, including Nairn's Fishertown (and the village of Cromarty?) are listed as Conservation Areas. The safeguarding of such assets should be a specific objective in a coastal strategy document.	Text amended.
Nature Conservation	Phillips Aitchison limited	Section 5.10 - Nature Conservation as an engine for economic development We strongly support the commitment to protection of designated nature conservation sites through the development planning process. We would like to see this strengthened to a general presumption against development except in carefully specified circumstances, such as infill. This might restrict, for example, further encroachment onto currently unzoned land south of Dornoch in the next phase of the Local Plan, and direct future south side expansion to north of Sutherland Road.	The Highland-wide development plan will provide the policy framework for dealing with proposals which would involve development in or close to designated nature conservation sites.

Section	Organisation	Comment	Response
Nature Conservation	Phillips Aitchison limited	<p data-bbox="580 180 1249 416">We also support the SNH submission that some organisation should take responsibility for managing the impact of recreational tourism on some species and habitats. For example, recent use of Loch Fleet National Nature Reserve has included jet skiers, kite surfers, quad bikers, trail bikers and mountain bikers, hang gliders and model aircraft flying.</p> <p data-bbox="580 456 1249 520">A further commentary on the Loch Fleet National Nature Reserve is attached as Appendix 1.</p>	Noted.

Section	Organisation	Comment	Response
Nature Conservation	Phillips Aitchison limited	<p>Para 2 states: "the Council will work with SNH and other appropriate agencies to support the development of sustainable wildlife-watching opportunities around the coast of Highland". We are aware of a proposal by RSPB and the Scottish Wildlife Trust to create a bird watching hide at Loch Fleet on the shore of Balblair Bay. This would require a dangerous new access on the A9 between Golspie and The Mound. Golspie Community Council would prefer such a hide to be approached through Balblair Wood from the Ferry Road, using the path and bridge recently upgraded by SNH, because it would be safer, attract extra footfall to the existing Nature Reserve, could be jointly publicised as part of any tourism initiative, and would be to the economic benefit of Golspie. Fund raising for the hide will benefit from this sort of additionally, and it would be a good example of collaborative working if Highland Council worked with the proposers to achieve it. While this is an issue of detail rather than strategy, the Strategy is littered with many other detail examples and we would like to see this logged for future action now.</p>	<p>The issue of access arrangements to a particular bird hide at Loch Fleet is one of local detail and it is not appropriate for it to be included in this strategic document. The Council may be able to help with this proposal but the proper approach should be through the access officers and the local planning office.</p>

Section	Organisation	Comment	Response
Nature Conservation	Scottish Natural Heritage	Coastal development and biodiversity In our scoping response, we highlighted the issue of coastal developments (and associated recreational boat traffic) in the Inner Moray Firth and impacts on the protected bottlenose dolphin population. For an issue of such significance, which affects European protected sites and species in an area earmarked as a major development expansion zone, we feel the strategy should consider the ecological capacity for recreational use. This could inform the sub-regional strategy for the East coast and also inform the consideration of options within the HWLDP. Further detail on this issue is contained in our comment on section 5.7.6 in the appendix to this letter.	It was beyond the scope of this document and HC resources to carry out such research. However, should data become available, it can be incorporated in future plans.
Nature Conservation	Scottish Natural Heritage	P21 5.10 Nature Conservation. This section might include more specific links to coastal and marine BAP/LBAP habitats and species in relation to their distribution and management needs in different parts of Highland. For example, machair is a special and threatened coastal habitat with a particular stronghold within the Highland Council area and which is experiencing very specific pressures and management needs (could also be mentioned in section 5.3 on crofting). This section could also mention wintering birds which occur on the east coast in internationally important numbers.	Text amended.

Section	Organisation	Comment	Response
Nature Conservation	Scottish Natural Heritage	P 21 5.10.2 In addition to ‘organised wildlife watching trips’, recreational boating should be added as an activity which can have an adverse impact on some species and habitats (especially relevant to the internationally protected Moray Firth bottlenose dolphin population).	Noted and text amended.
Nature Conservation	Scottish Natural Heritage	5.10.2 The strategy states that adverse impacts may arise ‘if no organisation takes responsibility for managing these impacts’ and we would advise that this is already an issue. Could this strategy recognise this as an issue and consider how the problem could be overcome e.g. by supporting/utilising existing groups where they exist such as the Moray Firth Partnership, by looking for opportunities through the Marine Bill or by clarifying THC’s role in this area.	This is not a spatial planning issue. It is an issue of corporate responsibility, site management, and effective monitoring which ultimately belongs with the main agencies with responsibility for safeguarding wildlife resources i.e. SNH and the Scottish Government.
Nature Conservation	Scottish Natural Heritage	P22 5.10.4. In addition to the Wildlife Safe (WISE) accreditation, it would be helpful to refer here to the Dolphin Space Programme and the Scottish Marine Wildlife Watching Code.	Noted and text amended.
Nature Conservation	Scottish Natural Heritage	5.10.4 We would welcome a stronger commitment here to taking forward the provisions of the Scottish Biodiversity Strategy (including reference to the Highland Council’s Biodiversity Duty).	Noted and text amended.



Section	Organisation	Comment	Response
Nature Conservation	Scottish Salmon Producer's Association	Paragraph 2 states “much of Highland economic value comes from natural heritage, such as wildlife watching”. It is surprising, but may well be true, that other industries, such as aquaculture, contribute so much less not only to the local economy, but the Highland economy as a whole, and on a larger scale, the Scottish economy.	This section of the strategy deals with nature conservation, not other industries.

Section	Organisation	Comment	Response
Nature Conservation	Scottish Salmon Producer's Association	<p>Section 5.10.2 identifies aquaculture as a pressure on Nature Conservation. Due to significant research effort, improvements in industry management policies and strategies, and massive technological advances, it is very questionable if this statement now has any basis in fact. Aquaculture must operate within stringent guidelines and strict SEPA and other regulatory standards to ensure that it is not a damaging influence on Nature Conservation. Intensive and expansive fish farming has co-existed with Nature conservation interests for more than 25 yrs. The fact that the wildlife tourism and conservation value of the Highlands is continuing to increase year on year, would suggest that these perceived pressures on Nature conservation are not a reality. This is supported by recent independent research undertaken by SARF. The tourism and aquaculture industries have not only co-existed, but have also co-developed with an expanding market. and there is scope for further synergy as food tourism increases in importance.</p>	<p>The statement made in the CDS is that “ development pressure can lead to the loss or fragmentation of coastal habitats and poorly located or managed installations can displace or disturb important wildlife species (such as cetaceans) or fragile wildlife populations (such as migratory wild salmonids).” The key word here is “can” (i.e. under certain circumstances) and the key qualifying phrase is “poorly located or managed installations”. This would not apply to well-conceived, well-managed and sensitively located fish farm proposals which the Council would hope to be the norm. The potential for aquaculture to have adverse effects on nature conservation otherwise (and the need to guard against this) is reflected in the Scottish Government’s 1998 Advice Note on Marine Fish Farming and the Environment and in SPP 22 (Planning for Fish Farming) published in 2007. SPP 22 states that “while the protection of the natural heritage may impose constraints on fish farming, with careful planning, the potential for conflict can be reduced.” It also states that the precautionary principle may be invoked where there is insufficient scientific evidence to support a decision that development will not cause significant irreversible damage.</p>

Section	Organisation	Comment	Response
Nature Conservation	Golspie Community Council	<p>•Nature Conservation, Section 5: Members support the proposal to work with SNH and other appropriate agencies to develop wildlife-based tourism. The attractions of Littleferry and Loch Fleet are of particular importance of to the economy of Golspie. As an example of /appropriate development there is a proposal by RSPB and the Scottish Wildlife Trust to create a bird hide on the shore of Loch Fleet. The proposed position of the hide, on the north shore would require a dangerous new access on the A9 between Golspie and The Mound. Members express serious concern about the safety of this site as it would entail visitors using an unmanned level crossing and a dangerous exit onto the A9. A hide approached through Balblair Wood from the Ferry Road, using the path and bridge recently upgraded by SNH, would be preferable. It would be safer, attract extra footfall to the existing Littleferry Nature Reserve and could be jointly publicised as part of any tourism initiative. It would also benefit Golspie economically. Fund raising for the hide requires this sort of added advantage. It would also be a good example of collaborative working if Highland Council could work with the proposers to achieve it.</p>	See earlier response to Philips Aitchison Ltd.

Section	Organisation	Comment	Response
Nature Conservation	International Power Marine Developments	<p>“New marinas could be in conflict with aquaculture sites or with cetacean populations; marine renewable energy projects (primarily off the east and north coasts) could have a negative impact on priority habitats or benthic species. Land-based sea mammal watching could start to have a severe local impact on coastal habitats as sites are being utilised beyond their capacity”. (p21)</p> <p>It is important that baseline surveys by professional wildlife observers are not jeopardised as collecting this information is essential to prove the impact of marine energy on marine life. New marinas could also be in conflict with marine renewable energy projects.</p>	Noted.
Nature Conservation	International Power Marine Developments	<p>“The open, remote landscapes and rugged cliffs are ideal for colonies of breeding birds. There are opportunities for more protection measures and research into priority species”. (p41)</p> <p>The development strategy should state the case for more protection measures. Already there is a robust system of SPA’s, SAC’s, SSSI’s, AGLV, GCR’s and an emerging network of MPA’s through the Scottish Marine Bill.</p>	Since drafting the CDS, a number of additions (31) to coastal SPAs have been designated. Numbers of seabirds are a national indicator for the UK Quality of Life indicators. In addition, the HC has a duty to enhance biodiversity and help with the protection designated sites.

Section	Organisation	Comment	Response
Nature Conservation	Nairn West Community Council	<p>16. Section 5.10 deals with Nature Conservation in detail and rightly points to the diversity of the terrain and the economic value of nature-related tourism. Para 5.10.2 then describes the threat from development pressures. But there is no strategic recommendation to guide policy and planning. Both in logic, and to be consistent with the analysis in Sections 2 and 3, we suggest that the strategy should here set out priorities, criteria or constraints on any development which might impact upon the natural coastline.</p>	<p>General policies for development on and around the coast, including the criteria which will be taken into account in assessing development proposals, will be set out in the Highland-wide Development Plan.</p>
Nature Conservation	Nairn West Community Council	<p>17. We endorse the recommendations in paras 5.10.3 and 4 supporting the provision of access and facilities and the designation of conservation sites - both of which, if sensitively done, will enhance the quality of the environment and the economic benefits.</p>	<p>Support noted.</p>
Landscape	Phillips Aitchison limited	<p>Section 5.11 - Landscape</p> <p>We are at a loss to understand why Loch Fleet and Strath Fleet, and Duncansby Stacks are not included in the National Scenic Areas. Here is an example of the failure of the classification, (Section 3.1 above), to recognise areas of International Importance.</p> <p>We note and support the SNH submission that more consideration should be given to the visual landscape of the coast especially as experienced from the sea.</p>	<p>It is not the responsibility of HC to designate NSAs; National Scenic Area designations are decided by national government, not local government. They are a completely separate exercise from the coastal classification. Duncansby Stacks is designated as a Special Protection Area (SPA). International designation will always be considered first in the hierarchy of decision-making. The map showing NSA's, which appeared as Figure 1 in the draft strategy document, has been deleted in the revised version.</p>

Section	Organisation	Comment	Response
Landscape	Scottish Natural Heritage	<p>Landscape and Wild Land</p> <p>We would welcome a consideration of wild land at the coast within the strategy. This would be consistent with HWLDP MIR which proposes to identify wild land areas and afford protection to them. The opportunity exists to include the identification of ‘wild coast’ not currently included in other wild land areas, including SNH’s own search areas for wild land. The link between ‘isolated coast’ and wild land needs to be explored, clarified and referred back through relevant policies in all related documents for consistency of approach. In this consideration should be given to views of the coast as experienced from the sea, particularly sea based recreation.</p>	<p>In the draft CDS the sub-regional strategy for the West Coast states as one of its strands “manage access and development to safeguard the integrity and tranquillity of key areas of coastal wild land”. It is agreed that the CDS would be strengthened by clarification of the fairly strong link between Isolated Coast and wild land and that the relevant policies in the HWDP should be amended accordingly.</p>
Landscape	Scottish Natural Heritage	<p>5.11 There is an opportunity here to include mention of wild land (see our general comments on this topic).</p>	<p>The importance of safeguarding wild land is mentioned in section 6.21 (Strategy for the West Coast).</p>
Landscape	Nairn West Community Council	<p>18. Landscape (para 5.11) is crucially important, especially for tourism but also for the recreation and quality of life of residents. But it is notoriously difficult to value in quantitative terms. Clear strategic guidelines are therefore essential. We would therefore wish to see para 5.11.2 and 5.11.3 incorporated, in full, in the HWLDP and in the other LDPs.</p>	<p>Cross -reference noted and passed to Development Plans Team for consideration.</p>

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Energy	Jones Lang Lasalle	It may also be important to consider the relevance and direction of the Scottish Government's National Renewable Infrastructure Plan which is currently being developed.	Noted. Highland sites proposed by SG are highlighted in the CDS and will be covered in more detail with the Council's HWLDP and renewable energy policies.

Section	Organisation	Comment	Response
Energy	Jones Lang Lasalle	<p>The Coastal Development Strategy recognises that the marine renewables industry is currently in its infancy. In this regard there is little detailed information regarding specific offshore projects in terms of accurate resource assessments, required on-shore project components, timescales for delivery and the applicable developer(s). With regard to tidal and wave energy, it should be noted that the vast majority of tidal stream resources and a significant percentage of wave resources adjacent to THC area would be captured within the scope of the Coastal Development Strategy given that the proposed area of control is to be seaward extent of 3nm. We therefore recommend that the Coastal Development Strategy should be a flexible policy document that can respond quickly to emerging information regarding offshore renewables projects in order to ensure that the most up-to-date and appropriate policy framework can be set in place to support this development potential. As SSE intend to develop a significant offshore wind and marine renewables business over the coming years, we recommend that detailed consultation with SSE and other key developers in the renewables industry, post the outcome of The Crown Estate Round 3 Offshore Wind and Pentland Firth Strategic Area Licensing processes, would be the most appropriate way of THC gaining a robust understanding of the likely coastal development requirements arising from offshore wind and marine renewables development. We suggest that should the Coastal Development Strategy be progressed as SG, the short consultation and adoption process required by the Development Planning Regulations would allow the strategy to respond quickly to new information arising, changing circumstances as well as technological advances.</p>	<p>Noted. The purpose of the Coastal Development Strategy is to provide strategic planning guidance for the coast and nearshore waters which complements the terrestrial guidance given in the HWLDP. The strategy recognises the potential for marine renewable energy developments and also identifies coastal resources which need to be safeguarded. There will be scope for revision of the strategy and the HWLDP in the future.</p>



Section	Organisation	Comment	Response
Energy	International Power Marine Developments	<p>“As the development of marine renewable energy is in its infancy, it is important that the appropriate marine spatial planning is developed in time to support this new industry. Guidance from the forthcoming marine bills, renewable energy strategies and marine spatial planning will all help consolidate the guidance necessary to assist the sustainable development of these new energy sources”. (p24)</p> <p>We welcome guidance to assist the sustainable development of new energy sources. However no mention is made of Pentland Firth Round 1 leasing program currently underway with the Crown Estate. The ambition of this leasing round is to achieve 700MW of marine energy projects by 2020 [3].</p>	Noted.
Energy	International Power Marine Developments	<p>“Through various policies, such as the Renewable Energy Strategy and associated work, the Council will support the sustainable development of the marine renewable industry. This document can support that development by providing information on the coastal classification and thus helping to identify the most appropriate sites”. (p24)</p> <p>We welcome guidance on site selection however by early 2010 developers will be constrained into specific areas leased by the Crown Estate. Developers will not be permitted to locate projects outwith these areas.</p>	Noted.

Section	Organisation	Comment	Response
Energy	Nairn West Community Council	19. We are content with the draft paras on Energy, Climate and Scientific Research.	Noted.
Climate Change	Phillips Aitchison limited	<p>Section 5.13 - Tackling Climate Change</p> <p>Section 5.13.1 states "the Council has a social responsibility to ensure that communities are safeguarded against the effects of changing weather patterns". Section 5.13.2 describes how climate change can lead to the arrival of new fish species which present dangers to the environment. This begs the question "So what are you going to do about it then ?"</p> <p>We have already reported to the Council and SNH the routine presence of Weever fish on beaches north of Dornoch. This species is poisonous when trodden on, and it would be sensible if the Council, knowing about the issue, posted warning signs on beach-side notice boards as is the practice in other Authorities. It might at least prevent potential legal action from an aggrieved beach user. So, while Highland Council is working up its Climate Change Strategy for Highland, it would be a good idea to make sure that day to day operational issues also find a ready response.</p>	Noted.
Climate Change	HIE Lochaber	Page 24 In 5.13.2 there is mention of increased intensity and frequency of storms, however need to clarify the evidence to support the comment about rising sea levels.	Amend text.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Climate Change	SEPA	Section 5.13: We are satisfied that the information provided on sea level rise and flood risk is accurate. You may wish to consider revising the second sentence "While the effects of changing weather conditions are ..." to "While the effects of rising sea levels as a result of climate change are ...".	Text amended as suggested.

Section	Organisation	Comment	Response
Climate Change	Scottish Natural Heritage	<p>Climate change and sea level rise</p> <p>We welcome section 5.13 on tackling climate change but are concerned that it gives insufficient emphasis to the issue of sea level rise that will inevitably lead to problems of coastal flooding and erosion in many parts of the Highlands. Given the seriousness of this issue, we would expect the strategy to contain a thorough and systematic discussion of the changing processes, changing associated risks and impacts and adaptive planning adjustments which could be considered. There are two recent publications which would support this area of the strategy:</p> <ul style="list-style-type: none"> <li>• UKCP09 outlines a range of terrestrial, meteorological and marine changes that are expected in the coming decades. (<a href="http://ukclimateprojections.defra.gov.uk/">http://ukclimateprojections.defra.gov.uk/</a>)</li> <li>• Sniffer (2008) A Scoping Review of Coastal Flooding (<a href="http://www.sniffer.org.uk/">http://www.sniffer.org.uk/</a> code: FRM10) – The Highland Council has been provided with the reports and mapped datasets.</li> </ul> <p>We would emphasise the following two points from these reports. The UKCP09 documentation acknowledges that recent isostatic uplift rates (also known as Vertical Land Movement) over the last decade are modest, smaller than increases in sea level, smaller than previously thought and smaller than the longer-term average (measured over the last few thousand years). This means that Scotland is not safeguarded from climate change induced accelerated sea level rise. This is reflected in the Sniffer review, which identified the Inner Moray firth as being at higher risk from the combined effects of coastal flooding (including sea level rise, surges and wave energy) than the remainder of the Highland coastline and than previously thought to be the case.</p> <p>It is true to say (5.13.3) that ‘climate change will</p>	Text amended in several sections following further discussions with SNH.

Section	Organisation	Comment	Response
Climate Change	Moray Firth Partnership	<p>influence where and what type of development takes place', and we might have expected the HCDS and hence the HWLDP to provide the basis for such strategic planning. However the strategy does not appear to contain the necessary information and policies to provide such guidance. Maps which use recent sea level rise projections to highlight areas at risk from coastal flooding could be included in the strategy and linked to appropriate policies to discourage development in areas of high risk. We would also welcome consideration of strategic policies on coastal erosion, defence and potential for managed realignment to safeguard valuable coastal habitats and provide natural flood defence. We would be keen to meet with appropriate Highland Council staff to discuss these issues in relation to both the HCDS and the HWLDP.</p> <p>7) The issue of Climate change and sea level rise is one that we feel is not adequately reflected in the report, particularly as regards the Moray Firth which was identified in the Sniffer Report (2008 - A Scoping review of coastal flooding) as being one of the areas at higher risk. Recent flooding storm incursions around the area certainly seem to bear out the latest warnings, and we feel that more needs to be done to highlight this risk and start to address this issue.</p>	Text amended to reflect most up to date information available.

Section	Organisation	Comment	Response
Climate Change	Scottish Salmon Producer's Association	A comment re the Tackling Climate Change section 5.13: why are the effects of changing weather due to climate change “anticipated to be less severe in the Highlands than elsewhere? Whether it be warmer, wetter, or drier, climate change will still have a significant impact, so why “anticipated to be less severe”? Perhaps a reference is required here for clarity. On the same page, Section 5.13.2, it should be made clear that changing climatic conditions will affect both wild and farmed fisheries; it reads at the moment as if only wild fisheries are being considered. The spread of <i>G. salaris</i> is more likely to be a result of irresponsible anglers or canoeists who use kit in an affected country and do not adequately disinfect their equipment, rather than changing climate as suggested here.	Text amended.
Climate Change	RSPB	2. Climate Change and Sea Level Rise (SLR) These issues are focussed on in section 5.13. We recommend that stronger cross-reference be made of this issue in relation to other parts of the document. In 5.1.2 (house building) is mentioned that a SLR of 5mm is predicted in the next 50 years for the north Highland area. In fact, the UK Climate Impacts Programme 2009 predicts up to 30 cm (medium scenario 2050) for the north and east coast areas and 25cm for the west. This will be especially felt in the low-lying areas of the Inner Moray Firth. That, along with riverine flooding, posed a large challenge to residents and the Local Authority in the coming years.	The text has been amended in several sections as suggested.

Section	Organisation	Comment	Response
Climate Change	RSPB	This challenge [SLR] will also be faced by the wildlife our coasts support. Mention should be made in Section 5.10 and Table 6.1 (nature conservation) of the threats posed by climate change, along the lines of the guidelines in Appendix 1, NPPG 13 (No. 52). This could then be linked to opportunities to protect and enhance the important wildlife habitats around the coast, thereby linking to both the guidelines in Appendix 1, NPPG 13 (No. 15) and the Local Authorities' duty under the Nature Conservation (Scotland) Act 2004, to further the conservation of biodiversity...	Text amended in several sections.
Climate Change	RSPB	In terms of Planning, mention could be made in 5.13.3 of the Flooding (Scotland) Act 2009, which will require Local Authorities to produce Flooding Risk maps.	Text amended as suggested.
Scientific Research	Scottish Natural Heritage	P25 5.14.1 This section states that "The relocation of SNH's headquarters from Edinburgh to Inverness in 2006 has potentially refocused greater scientific research effort in the Highland area, including coastal and marine projects." However, SNH's research strategy is developed in relation to the research priorities relevant at the time of the strategy's preparation and has nothing to do with the location of SNH's headquarters.	Text amended.

Section	Organisation	Comment	Response
East Coast	Phillips Aitchison limited	Section 6.1- Table, Development Opportunities for the Highland East Coast however, reading this document and the HWLDP Main Issues Report as a whole, we have been struck from time to time by the thought that the authors did not necessarily know the East Coast north of Dornoch all that well. In this section, the most disappointing text is "north east (sic) of Golspie and Helmsdale, visitor flows are relatively weak because, in the absence of major attractions, many tourists are drawn to the more spectacular scenery of the north and west." The lack of attractions is a myth routinely peddled by VisitScotland. The problem is lack of co-ordinated marketing as demonstrated at last week's North Highland Tourism conference. Therefore, where Highland Council has a role to play, either on its own or as a member of Planning Partnerships, we should like to see more positive economic development action identified in the Strategy.	<p>There may be a lack of co-ordinated marketing of the tourist attractions northeast of Golspie and Helmsdale but the Council would stand by its statement as factually correct.</p> <p>In the opportunities section of Table 6.1 the Council acknowledges that the east coast is rich in potential opportunities for tourism and recreation development. It also stresses the importance of pooling resources in remoter parts of the east coast to overcome the disadvantage of sparse population and distance from the main tourist market.</p>
East Coast	Phillips Aitchison limited	It is particularly important that the Strategy recognises the entire coastline of Caithness and Sutherland as a single destination, where extended touring holidays around the east, north and west coastline involve short stays in hotels, B&Bs or caravan sites.	Noted.



Section	Organisation	Comment	Response
East Coast	Phillips Aitchison limited	<p>As for the detail points in the table:</p> <p>. We would like to see wildlife, cultural and archaeological tourism developed throughout the coastal area, and we agree with the SNH submission on this matter there is significant day tourism from people leaving in the region, which will not show up in official figures</p> <p>the locations which tend to be by-passed by tourists from outwith the area include the coast north of Dornoch to Caithness, not the coast north of Helmsdale as stated. VisitScotland are complicit in this, specifically telling visitors to ignore East Sutherland as "there isn't anything there" (a quote passed on by an annoyed visitor). Greater promotion of quality beaches should include Blue Flag beaches at Embo and Golspie; promotion of the quality beaches north of Brora and at Loth requires access across the railway line and the co-operation of Network Rail, with which we wish you luck.</p> <p>There is opportunity to extend sailing activity by encouraging the provision of moorings in old fishing harbours with reasonable shelter from rough seas, (Brora and Helmsdale are examples). here is no mention; of East Sutherland's links golf courses which are of regional importance for their design, history, and economic significance</p> <p>there is no mention of the many local coastal and heritage paths which already exist but are not promoted. For example the Littleferry to Golspie coastal path, the Big Burn path and the Backies path should be integrated into a properly promoted East Sutherland Coastal Paths Network. We have seen this successfully done in other parts of Scotland.</p> <p>tourism signage is ineffective and in short supply, and tourism businesses find that officialdom either obstructs or under-delivers. A process is required to deliver</p>	<p>Noted. As the CDS is an over-arching strategy document and covers over 3,600 km of coastline, it is not appropriate to mention every facility or activity.</p>

Section	Organisation	Comment	Response
		<p>requested signs within a defined and short timescale, and at a cost which struggling businesses can bear. Wearing its economic development hat, Highland Council should work with its partner organisations to deliver this under the Single Outcomes Agreement, revised if necessary. specifically, we support the SNH request for proper information and interpretation signage at the parking areas on the Dornoch Bridge, which by the way, is where the authors saw an osprey catch a salmon while in motion. We cannot think of any other major trunk road where it is possible to see an osprey fly across the bonnet of one's car to catch a fish.</p>	
East Coast	Phillips Aitchison limited	<p>Agriculture &amp; Crofting: we strongly support the proposal for expansion of crofting, not merely for the environmental reasons set out in the table, but because crofting is a key contributor to the special cultural character of the North Highlands. We would like to see "creating new crofting townships" changed to read "creating new crofting townships and extending existing townships". Above all, we need to see crofting development find its way into the summarised strategy at 6.1.3.</p> <p>This remark applies equally to those parts of the North and West Coasts where the environment supports crofting.</p>	Noted.

Section	Organisation	Comment	Response
East Coast	HIE Lochaber	Page 26 Sub-regional overviews It would be helpful to have illustration of the three sub-regions (perhaps using the maps already in Appendix 3), and also to define the limits of each sub-region e.g. Duncansby Head to Cape Wrath.	As there are detailed maps classifying the coastline, additional maps would add little value.
East Coast	HIE Lochaber	6.1 Vision Since this Strategy is for the coastal zone, can the 1 km strip of land along the east sub region" ... accommodate significant population growth and major industrial development in this area, which at the same time can offer and sustain a pleasant environmental setting."? This requires clarification as most of the economic and housing development are likely to take place in areas contingent upon the coastal zone.	Noted.
East Coast	HIE Lochaber	Table 6.1 Harbours - There is a challenge in sustaining harbours such as Wick and Helmsdale and smaller slips and quays in the face of a shrinking fishing fleet and the potential of major repair/maintenance costs. As energy costs rise there may be opportunities in the medium term in coastal freight traffic, possibly even passenger traffic in and out of Inverness.	Noted.

Section	Organisation	Comment	Response
East Coast	HIE Lochaber	Page 37 6.1.3 2nd bullet point. Given the population centres in this sub-region the needs of the increasing resident population for recreation facilities should be recognised alongside the desires of tourist visitors to the area.	Noted: text amended.
East Coast	SEPA	Section 6: We would suggest that a key issue for all development of coastal population and housing is the requirement to ensure that new development is not at risk from flooding. We would also suggest that ensuring new development in populated areas is connected to public sewerage is a key issue for the coastal water quality topic.	Text amended to provide more detail on flood risk.
East Coast	Scottish Natural Heritage	Vision statements It would be helpful if these sections for East, North and West Coasts could set out a clear picture of the desired state of the coast in the future. However at present, these sections seem to be a summary of the current situation and some of the main issues and opportunities, which follow in the subsequent sections. This is less helpful as a strategic steer for identifying planning priorities to achieve a desired goal.	The vision statements go as far as seems practicable in a strategic document which aims to provide non-statutory guidance. The opportunities listed in the tables expand on the broad-brush vision set out at the beginning of each of the sub-regional strategies. They indicate positive directions of change which the Council would favour rather than a theoretical “end state” which, with changing circumstances, might make the publication go out of date more quickly. They also provide hooks for more detailed, sector-specific or area-specific strategies, plans and programmes to elaborate on. The necessity for a specific time frame applies more to the statutory document i.e. the HWLDP.

Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	P26 6.1 - East Coast. Vision, the statement about 'scope to accommodate significant population growth and industrial development' should link to a caveat about the ecological carrying capacity of the inner Moray Firth (see reference in general comments above).	Noted.
East Coast	Scottish Natural Heritage	P 26 6.1.1 Again the importance of the east coast for wintering birds, as well as breeding seabirds (Caithness Cliffs) should be emphasised in the appropriate sections. Loch Fleet NNR which hosts a range of intertidal and coastal habitats and species and provides a variety of opportunities for wildlife watching should be specifically mentioned.	Text amended.
East Coast	Scottish Natural Heritage	P 26 6.1.1 Add the underlined text: <u>....'the area's importance for birds and coastal wetlands, there are several (give number?) Special Protection Areas (SPAs) and Ramsar sites...'</u>	Text amended.

Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	P27 6.1.2 Again, it would be helpful to refer here to the need for capacity guidance to inform appropriate levels of coastal development in relation to sensitive marine nature conservation areas. However, specifically in relation to Nigg, although environmental concerns were raised, none were significant and all can be overcome with mitigation. The wording here implies that the environmental concerns posed constraints to the Nigg development and we would disagree with this.	It was beyond the scope of this document and HC resources to carry out such research. However, should the data become available, it can be incorporated in future plans.
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast  Coastal population and housing. Key issues – in addition to strain on infrastructure, refer here to potential impacts on environment. Also need to refer here to coastal flood risk issues.	Text amended.

Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Tourism and recreation (background). In addition to Chanonry Point, dolphin watching is also popular from a range of other areas including Nairn, Inverness, Avoch, Cromarty, Portmahomack and Wick. There may be scope to expand wildlife watching from other land bases around the coast along the lines of the Seal and Dolphin Centre at North Kessock or the Speybay centre in Moray. Note that there are ecological carrying capacity issues in relation to provision for recreational boating. Might also be worth mentioning that the cruise ship industry is developing well in this area with in excess of 30 liners coming in each year to Invergordon.	Text amended.
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Opportunities column: Regarding the greater promotion of the Moray Firth dolphins, we are wary about targeting tourism on one species (although this is inevitable to an extent) as this can lead to disproportionate pressure on that species, lead to high visitor expectation to see/get close to that species and then disappointment if it doesn't happen. We have been keen to promote the wide range of natural and cultural assets in the area including bird life, coastal landscapes and underwater archaeology rather than focus on just one, although obviously dolphins can be used of one of the key attractants.	Text amended.

Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Re promotion of marinas at Nairn and Inverness we would refer to our earlier comments about carrying capacity for new berths in the inner Moray Firth.	It was beyond the scope of this document and HC resources to carry out such research. However, should the data become available, it can be incorporated in future plans.
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Regarding scope to encourage tourism and recreation in less-frequented areas of the Moray Firth, we would support this proposal as it would help to reduce pressure on the more sensitive, inner parts of the Moray Firth	Support noted.
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Aquaculture. Should shellfish farming not be specifically mentioned here? Add text to line on offshore aquaculture ‘...should be explored in a manner that is consistent with the natural heritage interests of the area’.	Text amended.
East Coast	Scottish Natural Heritage	Table 6.1 Development Opportunities for East Coast Nature Conservation. Mention here the potential conflicts between coastal development (and associated infrastructure and recreational boating) with biodiversity. Remove reference here to SNH HQ in Inverness because we have good links with the LHFS and MFP, which have not been influenced by the location of our head office.	Text amended.



Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	<p>Table 6.1 Development Opportunities for East Coast Landscape. The opportunities listed here (e.g. enhancing layout of campsites) seem to relate more to tourism than landscape. What about views of the coast from the sea? This strategy talks about marine wildlife tourism and recreational/leisure craft – there perhaps it should recognise the visual/landscape importance of the area when viewed from these receptors. Also, there are growing numbers of people seeing the area for the first time from cruise ships that dock at Invergordon. Also, the important views from the main sea crossings should also be included as areas for improved information and interpretation, e.g. the Dornoch Bridge where parking is provided but no information or interpretation.</p>	<p>The view from passing boats in the Moray Firth is a legitimate landscape management consideration but in terms of development opportunities, it is not on the same level of importance as the potential for new or improved viewpoint facilities on some of the terrestrial vantage points. Text of table 6.1 (Landscape) amended to include mention of the opportunity for improved information and interpretation at some of the main bridge crossings over the inner firths.</p>
East Coast	Scottish Natural Heritage	<p>Table 6.1 Development Opportunities for East Coast Energy generation. What about coastal windfarms – this section seems to focus on marine renewables but picking up on the point made above, coastal windfarms (if poorly sighted or designed) can detract from the landscape quality of the area. Ongoing exploration of oil and gas in the Moray Firth poses a potential risk to wildlife population although most of this occurs beyond the 3 mile limit and falls within the remit of other groups.</p>	<p>Text added to the material on key landscape issues in Table 6.1 to mention the potential threat to coastal landscape quality which could come from wind farms if poorly located or designed.</p>
East Coast	Scottish Natural Heritage	<p>Table 6.1 Development Opportunities for East Coast Scientific research. Remove the reference to our HQ as we have always worked with these other sectors and the location of our head office is irrelevant.</p>	<p>Text amended.</p>

Section	Organisation	Comment	Response
East Coast	Scottish Natural Heritage	<p>6.1.3 - Strategy for East Coast</p> <p>Bullet 1 Remove Whiteness from this list – although it will be built on a brown field site it has the potential to have significant impacts on designated areas close by – therefore Whiteness is not necessarily a good example of a benign brown field development.</p> <p>Bullet 3 – add some text on ‘encouraging restoration and enhancement projects’ after ‘discouraging inappropriate development’.</p> <p>Bullet 5 - this is the first time shellfish farming is specifically mentioned in the Strategy</p>	Text amended.
East Coast	The Crown Estate	<p>East and North Development Opportunities: Infrastructure associated with offshore renewable energy generation. Development opportunities for the east and north coasts recognise the potential for offshore energy development, including renewable energy. It should be noted that The Crown Estate is also currently running a first round of wave and tidal renewable energy leasing in the Pentland Firth Strategic Area – we are offering to provide leases (not licences). This is likely to result in the requirement for onshore infrastructure, particularly in relation to grid (substations, conductoring, etc) and transport (roads, ports &amp; harbours, etc). It would be helpful if the CDS could refer to these requirements. This is relevant to the East Coast as well as the North.</p>	Text amended.

Section	Organisation	Comment	Response
East Coast	Moray Firth Partnership	<p>5) On Page 33, (Table 6.1 Development Opportunities for the Highland East Coast) under Nature Conservation, you state that "There are good opportunities to educate people about wildlife and the biodiversity in this area, using species such as dolphins and seals as a focal point. The Lighthouse Field Station at Cromarty and the Moray Firth Partnership have been assets to the area in this respect".</p> <p>The Moray Firth Partnership has a range of continuing projects and would welcome the opportunity to contribute towards a wider range of actions for the firth, not just restricted to nature conservation.</p> <p>One such project relates to Sustainable Marine Recreation and Tourism, which is due to report in March 2010. Our study includes a review of marine traffic in the firth, including recreational boat traffic, along with other coastal and marine uses, with the aim of highlighting some current and potential future pressures, especially given the increases in population and visitor numbers that are currently predicted. This report will highlight areas where there is most need for future coordinated management and consideration of mitigation measures, and we look forward to liaising with Highland Council as well as Moray and Aberdeenshire Councils in due course to look at how this could be taken forward.</p>	Noted.

Section	Organisation	Comment	Response
East Coast	Moray Firth Partnership	<p>6) The Highland Council was one of the partners and contributors to the Moray Firth Trail project, part of the international North Sea Trail (international long distance route in six north sea countries) (2004 - 2007). The Moray Firth Partnership is currently Scottish representative for the North Sea Trail Association ,which continues and aims to enlarge the Network and maintains / promotes the Trail through the website and annual events). Although there are various coastal paths identified within the Core Path Plans, there is further scope to enhance walking opportunities around the Moray Firth, subject to any environmental sensitivities. (there are North Sea Trail waymarked trails along the Aberdeenshire and Moray Coasts, but none as yet within Highland Region). Given the Scottish Government's recent interest in promoting a Scottish Coastal Way, the Moray Firth Partnership would be pleased to liaise further with Highland Council to look at opportunities in this regard.</p>	Noted.

Section	Organisation	Comment	Response
East Coast	RSPB	<p>3. Importance of Moray Firth</p> <p>Mention is made in 6.1.1 of the importance of the Moray Firth for birds. In fact, taken as a whole, it is the most important estuary in Scotland and the seventh most important in UK, supporting on average 142,000 wintering water birds. Protecting and enhancing the coastal sites on which these birds entirely depend needs careful planning in the context of the expanding human population in the Inner Moray Firth. For example, 5.10.3 and Table 6.1 (Tourism and recreation opportunities) make reference to the potential to increase access along the coast. Whilst the health and well-being benefits are to be lauded, we must ensure that undue disturbance, which could adversely affect these internationally important bird populations, is not caused by insensitive routing or increase pressure. There is already evidence of roost sites being abandoned when recreational infrastructure has been put in place (SNH Commissioned Report: Moray Firth Wader and Wildfowl Roosts Summary).</p>	<p>Comments noted. Any development would have to give due consideration to designed sites.</p>

Section	Organisation	Comment	Response
East Coast	RSPB	<p data-bbox="584 180 1263 523">4. Forestry Reference is made to consolidation or expansion of two forest sites that are currently on sand dune systems - Culbin (Table 6.1 and 6.1.3) and Dunnet (Table 6.2). In fact at Culbin, consideration is being given to removing some coastal edge forestry, to reinstate the mobile sand dune system, as part of a climate change adaptation strategy. At Dunnet, the woodland could be improved for public access but should not be expanded further onto the sand dune system.</p> <p data-bbox="584 560 1263 692">Reference is made in several places to enhancing forestry, especially west coast forestry, for recreational benefits. There is also much scope for enhancement for biodiversity gain in these forest blocks.</p>	Noted.

Section	Organisation	Comment	Response
East Coast	WYG Planning & Design	<p>On behalf of my client The Cawdor Maintenance Trust, I submit the following comments in respect of the Highland Council Draft Coastal Development Strategy. Specific reference is made to the coastal classification of land at Delnies, currently the subject of an application for planning permission in principle for mixed use development (PA Ref: 08/0080/OUTNA) and, identified for potential future development in the Council's approved A96 Strategic Framework Document.</p> <p>The Draft Coastal Development Strategy presents a classification of the Highland coast within the context of NPPG13: Coastal Planning. For the purposes of this document, "the coast" is defined as "the land area within 1 km of the coast and the inshore marine area out to 3 nautical miles".</p> <p>On the basis that the land at Delnies falls within this definition, the Draft Strategy is considered to be of relevance to its planning policy context.</p>	Noted.

Section	Organisation	Comment	Response
East Coast	WYG Planning & Design	<p>In general terms, the Council's strategy for the east Highland coasts seeks to "support the development of modern tourism-related businesses and recreation facilities, (Paragraph 6.1.3). While the ecological and landscape quality of the east Highland coast is recognised, the Council's 'Vision' states that "there is physical scope to accommodate significant population growth and major industrial development in this area, which at the same time can offer and sustain a pleasant environmental setting" (Paragraph 6.1).</p> <p>This is consistent with both existing ecological and landscape designations across the area, and the Council's preferred spatial strategy for growth articulated by the Highland Wide Local Development Plan Main Issues Report and A96 Growth Corridor Framework Plan.</p>	Noted.



Section	Organisation	Comment	Response
East Coast	WYG Planning & Design	<p>The A96 Growth Corridor Framework sets out the Council's preferred spatial strategy for growth. In so doing, a significant area of land to the west of Nairn is identified for future development. Although part of this area is specifically identified for tourism and leisure uses (which would sit comfortably with the provisions of NPPG 13 in respect of the undeveloped coast), an area of substantial residential growth is also identified within the coastal zone.</p> <p>On the basis that the Council's preferred option within the Highland Wide Local Development Plan Main Issues Report seeks to identify future residential development at Nairn West, clarity is sought on how the proposed Coastal Development Strategy designations will be reconciled within this in the emerging Local Development Plan.</p> <p>It is acknowledged that the Coastal Development Strategy Maps are based upon established land use patterns at the time of preparation. However, clarity should be provided within the accompanying narrative to avoid any future potential conflict with growth objectives for the area.</p>	Text amended and clarified in section 1.4.

Section	Organisation	Comment	Response
East Coast	Nairn West Community Council	Section 6: Sub-Regional overviews 20. In the light of all that is contained in sections 1-5, and our comments above, we profoundly object to the statement in para 6.1 that "There is physical scope to accommodate significant population growth and major industrial development in this (East Coast) area.." This is a complete non-sequitur. Nothing in the draft coastal strategy supports or validates this assertion, and most of the draft rightly identifies the constraints and limits on such development.	As the name suggests, the Coastal Development Strategy is first and foremost about how to develop the coast, in a sustainable manner.
East Coast	Nairn West Community Council	21. A more suitable formulation would be to state that there is scope to accommodate limited population growth and appropriate economic development. The growth in population has to be limited by the absorptive capacity of the infrastructure and the potential impact on all the assets the coastal strategy describes. There is no obvious reason why development has to be "industrial". Some may indeed be industrial (e.g. marine energy equipment-fabrication); but local economic development could and should as easily be enterprise which leaves a lighter footprint (such as IT-dependent business and commerce), and services activities which are integrated with the hinterland, such as agriculture-related processing and tourism facilities.	Noted.

Section	Organisation	Comment	Response
East Coast	Nairn West Community Council	22. It follows that the main issues which arise are (a) the scale of development, whether housing or business-related; (b) the pace/timeframe of such development; and (c) the impact (on the coastal environment) of development. To be useful as a strategy, we suggest that the draft should set out some parameters and some criteria for each, which can then be reflected in policy and in planning decisions.	Noted.

Section	Organisation	Comment	Response
East Coast	Nairn West Community Council	<p>23. Table 6.1 is broadly sensible. We have the following detailed notes:</p> <ul style="list-style-type: none"> <li>-Coastal Population &amp; Housing - should include some suitable cautionary reference to the potential impact of the A96 Corridor/Tornagrain/Nairn expansion proposals, which constitute a threat, as well as an opportunity, to the quality of the adjacent coastal zone.</li> <li>-Tourism - we endorse all the text.</li> <li>-Forestry - we note that Culbin is listed here as a forestry, but not a recreational asset.</li> <li>-Harbours - Nairn is not mentioned at all. It should be, as it is a current and future asset which deserves enhancement (while Whiteness has yet to come into existence).</li> <li>-Water &amp; waste - Nairn beach is only a "marketing opportunity" if adequate measures are in place to ensure and safeguard water quality, especially if standards are to be tightened under the new Directive.</li> <li>-Heritage - as mentioned, Nairn Fishertown is an asset which could be better exploited; and there is an SSSI at Carse of Delnies.</li> <li>-Nature, and Landscape - we welcome all the ideas listed.</li> </ul>	Noted.

Section	Organisation	Comment	Response
North Coast	Scottish Natural Heritage	Table 6.2 – Development Opportunities for North Coast Tourism and recreation – Whiten Head isn’t comparable to Dunnet and Duncansby Head. There are no roads, paths or formal access of any kind to Whiten Head unlike the other two. Agree that promotion / development of surfing at beaches along the north coast would have to be supported by infrastructure/service provision such as car parking / litter removal and signage to prevent further vehicle damage to many of designated sites where this is already an issue.	The text does not suggest that Whiten Head is as accessible as Dunnet Head and Duncansby Head. It simply says that it (also) is impressive, under-publicised and worthy of more visitors. Whiten Head can be visited by boat as an alternative to the long walk over moorland.
North Coast	Scottish Natural Heritage	Table 6.2 – Development Opportunities for North Coast Nature conservation – “opportunity for more protection measures” – we are not sure what this relates to. We are also confused by the statement ‘ reducing population means less people to care for the environment’.	Since the draft of the CDS was published, a number of new areas of the north coast were designated as SPA, hence 'greater protection measures'. Text amended.
North Coast	Scottish Natural Heritage	6.2.3 – Strategy for North Coast It is odd that this section does not refer to the Pentland Firth Marine Spatial Plan which is currently being developed. Also there is no reference here to the Action Plan for Caithness and the proposals for developing Scrabster and Wick harbours which are all referred to in the HWLDP MIR.	Text amended.

Section	Organisation	Comment	Response
North Coast	Dunnet Head Educational Trust	1. There is potential for extending the North Sea Trail from John o Groats to Scrabster together with transport links to the Scandinavian countries who are involved with the North Sea Trail- see <a href="http://www.northseatrail.co.uk/">http://www.northseatrail.co.uk/</a> . The trail is not currently being marketed due to lack of funds. The main infrastructure is in place, in particular with the development of the Core Path Networks but requires investment.	Noted.
North Coast	Dunnet Head Educational Trust	3. Upgrade and utilisation of Brough Bay and Dwarwick Pier on Dunnet Head for public use would encourage more visitors in addition to the one at Loch Eriboll.	Noted.
North Coast	Dunnet Head Educational Trust	4. Upgrade and utilisation of other piers and harbours on the north coast would enhance the opportunities for recreation and attract more visitors.	Noted.

Section	Organisation	Comment	Response
North Coast	International Power Marine Developments	<p>“The Highland north coast has more of the character of a frontier than its eastern and western counterparts. Remote and mainly rugged, exposed, and thinly populated, it marks the northern extremity of the British mainland”. (p37)</p> <p>Realising 700MW of Tidal Energy by 2020 will require a major industrial undertaking including the upgrade of ports, construction of engineering facilities and substantial upgrade of the electricity transmission grid.</p>	Noted.
North Coast	International Power Marine Developments	<p>“Most of the population on the north coast is concentrated around the Thurso/Scrabster/Dounreay area where commercial fishing, ferry services to the Orkney Islands and energy generation have a significant presence. These, combined with a strong stock-farming sector on good quality agricultural land, make the local economy of Caithness distinctive and relatively resilient”. (p37)</p> <p>A 2005 socio-economic assessment (based on statistics from 2001) [4] indicated that 20% of the Caithness population was employed directly or indirectly by Dounreay. Figures from this draft strategy state:</p> <p>Population predicted to decline by c. 7% over the next 20 years. 7.4% of the coastal housing completions in 2008 were on the north coast. (p39)</p> <p>It is important that planning policy acts as an enabler to the growth of new industries such as marine energy, since the workforce at Dounreay is inexorably in decline.</p>	Noted; the statement relates to a vision for the north coast rather than what may actually exist at present.

Section	Organisation	Comment	Response
North Coast	International Power Marine Developments	<p>“Dounreay will take over 20 years to fully decommission so the skills gained during that time should be redirected into other industry that will support local communities. The marine renewables industry in particular offers the opportunity to counteract population decline”. (p39)</p> <p>The 2007 Lifetime plan gives a decommissioning end date of 2032. This was revised to 2025 in the 2008 Lifetime plan, meaning decommissioning will end 15 years from today [5] The timeline would further shorten should the 2010 Lifetime plan continue this trend. If alternative industries such as the marine renewable industry are to mature quickly enough to supplant Dounreay as a major engineering employer, enabling planning policies are essential.</p>	Noted.
North Coast	International Power Marine Developments	<p>“Tourism and Recreation Advantages” (p39)</p> <p>There is the possibility of a marine energy visitors centre as part of the John O’Groats redevelopment. This has been discussed with HIE who are receptive to such an idea.</p>	Noted.
West Coast	HIE Lochaber	Page 49 The background on aquaculture should include shellfish.	Text amended.



Section	Organisation	Comment	Response
West Coast	HIE Lochaber	Page 51 Landscape - Opportunities - Include in tree planting schemes the beneficial impacts of broadleaf planting on freshwater systems and thereby improved salmonid stocks.	Noted.
West Coast	Scottish Natural Heritage	6.3.2 – Strategy for West coast . 7th Bullet – where did the ‘support for renewable energy....tidal power in North West Sutherland’ come from? Not backed up by preceding text. Need to be aware of Handa and Cape Wrath SPAs marine extensions.	Text amended.
West Coast	Scottish Natural Heritage	P48 Forestry. Not sure we understand the reference to Applecross and Flowerdale here (in relation to the schemes that have already been undertaken or are in hand).	A number of areas have potential for further enhancement.
West Coast	Scottish Natural Heritage	P49 Aquaculture. Again refers to riparian interests rather than wild fisheries interests. And here talks about ‘perceived’ impacts. This is unhelpful given the weight of evidence.	Text amended.
West Coast	Scottish Natural Heritage	P51 Landscape Should also be reference to the location of activities such as aquaculture.	The text in the “key issue” column for landscape on the west coast already makes mention of the need for careful appraisal of proposals for installations in nearshore waters.

Section	Organisation	Comment	Response
West Coast	Scottish Natural Heritage	Page 51. Under renewable energy topic, there is no reference to connecting to the National Grid. Making this connection could, however, have implications for the siting, scale and nature of renewable energy developments.	Text amended.
West Coast	Scottish Natural Heritage	P53 6.3.2 Include Kishorn as a key site for developing coastal timber extraction barge sites.	Text amended.
West Coast	Scottish Salmon Producer's Association	Table 6.3 Members have pointed out that there are still opportunities for further optimization of existing sites. The move to more exposed sites is uncertain and longer term. The comment about the EIA regulations being an additional expense for industry is found to be rather odd and it would be more appropriate to say how this has helped the industry and the planners to better evaluate the environmental challenges that exist and to see that in a positive light.	Text amended.

Section	Organisation	Comment	Response
Appendix 3: Maps	Jones Lang Lasalle	<p>It would be appropriate, when considering the potential of other port locations, to recognise the past developments at Loch Kishorn. In 1975 an oil rig construction yard was opened which built Ninian Central, the largest man-made movable object ever built at the time (600,000 tonnes). The yard employed 3,000 people at its peak and operated until 1987, although in 1991 the dry dock was used to build parts of the Skye Bridge. While the old facilities have largely been removed, a pier is still operated for cargo traffic. We understand that the dry dock remains operational and that there are very large areas of hard standing that could be utilised as fabrication yards. The port is also reasonably isolated in terms of its proximity to residential populations.. In this regard, we recommend that it is inappropriate to allocate Kishorn as 'undeveloped' or 'isolated' within the draft Coastal Development Strategy. We recommend that Kishorn is allocated as 'developed' coast, not only to recognise the fact that the area is actually still developed to support the offshore marine renewables industry should it emerge as being of strategic importance.</p>	<p>“Undeveloped” is currently the most appropriate classification for inner Loch Kishorn in terms of the PAN 53 indicators (in both their original Scottish Government form and their adapted Highland Council form). However, this does not preclude the development of Loch Kishorn’s port function to service marine renewable energy installations off the west coast. The Scottish Government’s policy guidance in NPPG 13 gave two key criteria which should be met by development proposals on the Undeveloped coast:</p> <ul style="list-style-type: none"> <li>• they should be expected to yield social and economic benefits sufficient to outweigh any potentially detrimental impact on the coastal environment</li> <li>• there should be no feasible alternative sites within existing settlements or on other previously developed land</li> </ul> <p>Arguably these criteria would both be met by a well-conceived scheme for developing Kishorn to service marine renewable energy installations off the west coast – one which respects the amenity of local communities and the area’s wider environmental setting.</p>

Section	Organisation	Comment	Response
Appendix 3: Maps	WYG Planning & Design	In accordance with Map 6 of the Draft Strategy, land at Whiteness and Nairn is defined as part of the developed coast. The stretch of coastline between these 'developed' area is classified as undeveloped. Due to the scale of mapping used, the western boundary of the 'developed coast' at Nairn, as defined by the Draft Strategy, is somewhat unclear. However it would appear to broadly follow the existing town development boundary. The land at Delnies therefore appears to fall wholly within the undeveloped coast.	The land at Delnies does fall with the undeveloped coast category. However, the introductory text has been amended in light of the new single SPP, which does not have an equivalent category.
SEA	Historic Scotland	Part 2: Environmental Report The Environmental Report is clearly presented and I agree with the findings of the assessment for the historic environment. I welcome that our comments at scoping have been largely taken into account.	Support noted.
SEA	SEPA	1. General Comments We consider that the ER is adequate for a strategy of this nature.	Noted.
SEA	SEPA	2. Detailed Comments 1. Relevant aspects of the current state of the environment 1.1 As highlighted at the scoping stage the way we monitor the water environment has now changed and we would have expected you to refer to this more up to date information.	Noted.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
SEA	SEPA	2. Assessment of alternatives and proposed strategy 2.1 We would have welcomed a detailed explanation as the individual impacts identified in the alternative tables; a comments column, as used in Table 15 would have been beneficial. For example, it is not clear why the "do nothing" option would result in a long term negative impact against the climate change SEA objective.	Noted.

Section	Organisation	Comment	Response
SEA	SEPA	<p>2.2 We are pleased to note that you have assessed individual aspects of the strategy, however, we consider that the strategy has fewer impacts than Table 15 suggests. Our reading of the strategy is that it provides high level aims for the area, but it does not provide any specific policy or guidance. As a result the environmental effects of some specific sections of the strategy are rather limited. For example, what actual effect does the section of the strategy on legislation and policy have? We would suggest that as this sections contains no aims, policies, proposals, allocations, guidance or actions it has no effect on the environment.</p>	<p>The strategy has two main facets. One of these is linked to the coastal classification and indicates in broad terms where development is likely to be appropriate and the considerations which should apply to this. The other is based on an overview of the key issues and opportunities on each of the three main sections of coast in Highland and indicates strategic planning priorities.</p> <p>The consolidation/simplification of the national planning policy guidance for Scotland, which took place after the draft CDS went out to consultation, has blurred the link between the coastal classification and national policy by changing elements of the terminology and suggesting that planning guidance for developers should now be activity-specific. However, the general importance of identifying and protecting the resource of isolated coast continues to be emphasised by the new national guidance. This has been picked up in the general policies in the draft HWDP. The draft HWDP also sets out general policies on coastal development and aquaculture.</p> <p>The section headed “key coastal legislation and policies” is mainly background – the wider planning policy context within which the CDS sits. However section 4.5 has been expanded to set out Highland Council’s general policies on development around the coast and protection for the isolated coast.</p>

Section	Organisation	Comment	Response
SEA	SEPA	2.3 We would suggest that the aims of the strategy, the visions for the sub-regions and the classification of the coastline are the aspects of the strategy which would have had significant effects. In future work you may wish to assess against these type of issue, rather than against different sections of the document.	Noted.
SEA	SEPA	3. Measures envisaged for the prevention, reduction and offsetting of significant adverse effects. 3.1 We agree that the strategy will not have any significant negative environmental effects.	Noted.
SEA	SEPA	3.2 It is not clear how the strategy will have a positive effect on flood risk; the strategy does not seem to provide any aim or action to address this issue. However, the councils' local development plans contain policies which support the avoidance of flood risk and this could be identified as a measure to reduce the problem.	Noted.

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>We have noticed several omissions from the list of relevant PPS at the regional level, which could have informed the identification of topics for the SEA. These include the 'Shoreline Management Plan for Inverness Firth and part of the Moray Firth (Burghead to Sutors)', the 'Moray Firth SAC management Scheme; Revision2, and the 'Management Guidelines and Action Programme' produced by the Moray Firth Partnership in 1999. Although the latter document is now quite old, the topic papers produced as part of this process contain a large volume of useful information on issues like coastal defence, archaeology, etc.</p>	<p>Noted; HC will strive to improve its response to future SEA documents as its knowledge of the process develops.</p>
SEA	Scottish Natural Heritage	<p>In referring to designated sites (e.g. paragraph 2 on page 20) it is worth highlighting that there have been some recent marine extensions to existing seabird SPAs. Updated information and boundaries for these (and all other) site designations is available on the SNH website at <a href="http://www.snh.org.uk/snhi/">http://www.snh.org.uk/snhi/</a> which would be a useful data source for several topics listed in table 3. Under natural environment on page 23, we welcome the reference to particular coastal habitats which might require special attention (e.g. machair and sand dunes) but these habitats are not specifically referred to in the HCDS and it is not clear how the stated SEA objectives will be achieved.</p>	<p>Noted, although the SPA extensions were notified after the draft ER was published. HC will strive to improve its response to future SEA documents as its knowledge of the process develops.</p>



Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>We do not consider population figures and age data to be relevant to the environmental baseline as these are social data. The landscape section on page 30 refers to SSSIs and SACs. It should be clarified that these are not landscape designations and therefore not relevant here, whereas National Scenic Areas should be mentioned. Similarly, table 9 lists 'loss of local landscape character' as a biodiversity impact whereas this should be covered later under landscape.</p>	<p>Noted; HC will strive to improve its response to future SEA documents as its knowledge of the process develops.</p>

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p data-bbox="584 180 1263 691">Consideration of Environmental Impacts In several places with tables 9 and 16, the ER states that environmental impacts are 'more likely to arise from individual developments rather than as a direct result from the HCDS'. As a contrast, also within table 9, the section on water states that 'the HCDS will ... Put in place a policy framework which takes into account any potential detrimental impact on watercourses or the coastal environment.' We welcome this second statement, although it is not clear within the strategy itself that this has been achieved, and generally consider that the HCDS could have taken a more proactive approach by proposing strategic measures to address identified environmental impacts, both within the strategy itself and through influencing appropriate policies within the HWLDP.</p> <p data-bbox="584 730 1263 1209">For example, table 9 refers to the biodiversity impacts arising from coastal developments. In our scoping response, we highlighted the issue of coastal developments (and associated recreational boat traffic) in the Inner Moray Firth and impacts on the protected bottle-nose dolphin population. For an issue of such significance, which affects an area earmarked as a major development expansion zone, we would have expected the SEA to have flagged up the sensitivities of further development, and taken this forward through an assessment of ecological capacity for recreational use which could have informed the sub-regional strategy for the East coast and also informed the consideration of options within the HWLDP.</p>	Noted; HC will strive to improve its response to future SEA documents as its knowledge of the process develops.

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>Climatic factors</p> <p>Table 9 refers to 'lack of sustainable design' as the only potential environmental impact listed under this heading (although tidal flooding is mentioned under water). As we stated in our scoping response, we consider that coastal flooding and erosion caused by sea level rise and increased storminess due to climate change impacts should be an important consideration of the strategy. We expressed our hope that this would inform policies in the HCDS (and hence HWLDP) on shoreline management planning, potential for managed realignment and the need to avoid coastal developments (such as house building, roads and railways) in vulnerable areas. It is notable that several of the major development sites described in the Main Issues Report of the HWLDP (e.g. Inverness, East Inverness, Nairn) are highly vulnerable to coastal flooding. We are disappointed that the SEA and strategy have not developed this further. The section of climatic factors on page 29 states that 'data should become available on geomorphological implications of coastal flooding which may be incorporated into updated versions of the strategy.' In fact, this data is available now, together with maps which highlight areas at risk of coastal flooding, and we suggest that this is of fundamental importance in informing the HCDS and HWLDP. The climatic factors paragraph on existing problems (p29) states 'none' when this is actually one of the most urgent environmental issues relevant to the strategy.</p>	<p>Noted: the CDS has been amended to incorporate up-to-date information supplied by SNH.</p>

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>Alternatives to which SEA was applied</p> <p>Table 13 assesses the likely effect of the HCDS on achieving the SEA objectives. In relation to biodiversity, water quality and landscape objectives, the effect of the strategy is deemed to be 'significantly positive'. This seems to rather overstate the influence of the HCDS and we are concerned that it will be difficult to achieve these desired positive outcomes without a clear set of strategic policies to achieve the objectives and better alignment between the HCDS and the HWLDP. In table 15, the HCDS is broken down into sections to assess the cumulative effects of the SEA objectives. Some of the sections considered (introduction, legislation, etc) are purely descriptive and contain no policies, proposals or actions and it is therefore difficult to see how these could cause environmental impacts. It might have been more useful to focus on the sections which do contain policy proposals - particularly the sub-regional overviews and coastal classification sections, and to assess whether some of the proposals raised environmental impacts where mitigation might be required.</p>	<p>Note; HC will strive to improve its response to future SEA documents as its knowledge of the process develops.</p>

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>Mitigation measures</p> <p>As mentioned above, the consideration of need for mitigation in table 16 is based on an appraisal of the HCDS as a whole, rather than more specific policies. It would have been helpful here to have included an acknowledgement of the potential environmental issues arising from the more major proposals in the sub-regional overviews, such as marine renewables in the Pentland Firth or further aquaculture development on the West coast, and some analysis of how these might be addressed, e.g. how to resolve potential conflict between the Moray Firth dolphin population and demand for coastal development (which is referred to in table 16).</p>	Noted: effort will be made to improve the process.

Section	Organisation	Comment	Response
SEA	Scottish Natural Heritage	<p>Monitoring</p> <p>We assume that the SEA indicators proposed for monitoring are those listed in tables 3 and 8. We are not convinced that monitoring these indicators collectively would provide the information needed to assess the success of the HCDS and would urge that further careful consideration is given to select more targeted measures of success. We have some detailed comments on these as follows:</p> <p>The number of visits to designated sites is not really a biodiversity indicator, although it is relevant to human health and population in relation to access to the countryside.</p> <p>In monitoring impacts on biodiversity it would be more useful to review data on the condition of designated sites rather than just the number of sites.</p> <p>Indicators on population and age profiles are not relevant to environment and are unlikely to be directly relevant to provisions within the strategy.</p> <p>In table 8, there is a listed indicator/target on 'increase in landscape and townscape character'. This suggests a misunderstanding of the concept of landscape character, which is not a quantitative measure which can be increased, but rather a descriptive approach which is helpful in highlighting sensitivity to changes.</p>	<p>Noted; the process will reviewed in conjunction with the evolving HWLDP requirements.</p>
HWLDP	SEPA	<p>Q34 Coastal Development                      In so far as SEPAs interest are concerned we agree with the preferred option and make the following comments to assist in the development of relevant policies.</p>	<p>Cross-reference noted; to Development Plans Team for response.</p>

Section	Organisation	Comment	Response
HWLDP	SEPA	We agree that the HWLDP needs to link clearly with the Coastal Development Strategy. Both plans need to be future proofed so that they link with marine spatial planning under the Marine (Scotland) Bill and implementation requirements of the Marine Strategy Framework Directive (MSFD) as they develop.	Cross-reference noted; to Development Plans Team for response.
HWLDP	SEPA	With regard to the second bullet point on page 68 the MSFD will promote the ecosystem approach which means that it takes account of the linkage between the land sea interface and the importance of healthy biodiversity providing services (such as fisheries, flood defence and climate change mitigation).	Cross-reference noted; to Development Plans Team for response.
HWLDP	SEPA	Under the Water Framework Directive (WFD) the UK and Ireland are now required to manage hydromorphological change in all coastal and transitional water bodies to ensure that they achieve 'Good Ecological Status (GES)' and that there is no deterioration in status. The structure and condition of the intertidal zone is a quality element under the WFD. It should be recognised that there is a need to protect the remaining areas of the intertidal zone along some stretches of the developed coastline as these areas have become fragmented/degraded by the coalescence of development in the past.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	SEPA	The Highland Council has been in the vanguard of preparing aquaculture framework plans over many years. These have been very useful and are currently being updated as resources allow. The preferred options, although vague, are commendable and should be supported. We will be pleased to provide assistance in the development of the relevant policies in the HWLDP.	Cross-reference noted; to Development Plans Team for response.
HWLDP	SEPA	Taking into account the differing requirements for these activities we do not anticipate that the potential locations of marine renewables will present a major conflict with fin fish aquaculture sites unless current practices change considerably and aquaculture moves into more energetic waters.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Natural Heritage	Coastal development: a general policy for aquaculture is proposed, but we prefer the alternative of a spatial approach that identified search and sensitive areas, informed by environmental constraints.	Cross-reference noted; to Development Plans Team for response.



Section	Organisation	Comment	Response
HWLDP	Scottish Natural Heritage	<p>The first part of the preferred option is to prepare a coastal development strategy and link this to the HWLDP. We are commenting separately on the draft Coastal Development Strategy. It is essential that the Proposed Plan and HCDS are fully compatible, so coastal issues included in the HWLDP, e.g. the A96 corridor, Easter Ross, Nigg, Dounreay, Scrabster and Wick harbours, marine renewable onshore infrastructure, coastal flood management should be reflected in and taking account of the coastal/marine issues in HCDS. A key issue for consideration and cross-linking is coastal flooding (sea level rise, storm surges and wave energy.) UKCP09 outlines a range of terrestrial, marine and meteorological changes that are expected in the coming decades (see <a href="http://ukclimateprojections.defra.gov.uk/">http://ukclimateprojections.defra.gov.uk/</a>). SNIFFER (2008) A Scoping Review of Coastal Flooding (see <a href="http://www.sniffer.org.uk/">http://www.sniffer.org.uk/</a>) code: FRM10) identifies the Inner Moray Firth as being at higher risk from the combined effects of coastal flooding than the remainder of the Highland coastline. The implications of this need taking across into proposals for the A96 Corridor and Easter Ross.</p>	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Natural Heritage	<p>The second part of the preferred option is to have a general policy for coastal development. This refers to designated areas and the character of the area, but other criteria would be necessary, such as species and habitats, visual impact, land/seascape, coastal processes and access/recreation.</p>	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Scottish Natural Heritage	The third part of the preferred option is for general policy on aquaculture, possibly through supplementary guidance. However it is unclear where aquaculture framework plans would sit within this work and how spatial guidance, informed by environmental constraints, would more generally be available.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Natural Heritage	The stated alternative to the preferred option - or to the third part of the preferred option - (identification of search areas and sensitive areas for fish farms, subject to detailed location and environmental consideration) is closer to that required under SPP22 and the draft consolidated SPP. While again it is unclear how aquaculture framework plans would operate within this option, on the face of it this seems preferable in terms of delivering clear and specific spatial guidance, informed by environmental constraints. It accords more with the desire under the modernised development plan system for plans to be map-based. We would therefore welcome this alternative.	Cross-reference noted; to Development Plans Team for response.
HWLDP	The Crown Estate	We welcome the Coastal Development Strategy being consulted alongside the WDP. We welcome the proposal to clarify links between the HWDP and Coastal Development Strategy. We believe all development should be promoted where it will not have an unacceptable adverse impact on statutory designations or natural heritage features.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	The Crown Estate	Where aquaculture policies are developed, we believe that Highland Council should seek to align its position with all other Authorities issuing planning permission to marine fish farms. Such a process of cooperation has the potential to benefit the industry whilst improving overall environmental protection.	Cross-reference noted; to Development Plans Team for response.
HWLDP	WYG Planning & Design	Q34 The Council's desire to provide a clear link between the Local Development Plan and Coastal Development Strategy is strongly supported. However, there is a need to reconcile any potential conflict with the identified expansion areas for the A96 Corridor which fall within the 'undeveloped' coastline as defined by the Coastal Development Strategy. A separate representation to the Coastal Development Strategy has been made in order to address this issue.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Use of sea and seashore Related to foreseen world food shortages, scientists are investigating krill and algae at or near sea surface as potential food sources. With warming of our coastal waters algal blooms are occurring further north than previously. Is UHI taking part in this? If not, could it? Seaweed is a substance used extensively in 'green' cosmetics and also used as a natural food additive. Are we making use of our resources?	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Private individual	Fish farms were recently reported to be successfully using larger cages in deeper water. This seems to provide a better quality product with less danger of spreading disease to wild stocks, always a concern for salmon rivers. I understand there is an excellent example of fish farm management on Loch Torridon. Retaining high standards much accompany any expansion.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34 Coastal Development Coastal housing development is not sensible in view of rising sea levels. Marine planning is necessary, but it is important not to make it unnecessarily bureaucratic.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Council for Development & Industry	Coastal Development: There is a critical interface between marine planning and land use coastal planning. SCDI welcomes the policy of providing a clear link between the Local Development Plan and the Coastal Development Strategy in advance of the establishment and implementation of the new marine planning system at the national level. This needs to lead to the creation of an integrated, streamlined approach to sustainable economic development in Highland's coastal areas.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Scottish Council for Development & Industry	Minimising conflicts of interest is especially important where offshore development of wind, wave and tidal energy would have an impact on whether the onshore coast is considered to be developed. The best natural resources are often located around the most isolated coasts. SCDI generally accepts the presumption against development in these areas, it may be that essential onshore infrastructure is required for such offshore developments. Where no practical alternative exist and after weighing up the wider environmental benefits, there may be circumstances in which some development is needed if Scotland is to achieve its statutory renewable energy and climate change targets.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Council for Development & Industry	Whilst the Council has some Aquaculture Framework Plans, these do not provide anything approaching a comprehensive coverage of the substantial marine resources in the Highland area, which are potentially suitable for aquaculture developments. Some additional consideration of these areas may be provided by the Highland wide Local Development Plan but it is apparent that a comprehensive planning framework, as envisaged in the Marine (Scotland) Bill, will not be available for many years. In the absence of a comprehensive planning framework, it is recommended that the Highland wide Local Development Plan and Local Development Plans are augmented by a process of "developer-led planning" based on initial pre-application discussions with the planning authority.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Private individual	Coastal Development: I prefer the stated alternative, as there are too many poorly sited fish farms in scenic areas and on migratory routes of wild fish. Atlantic salmon are a European protected species, and the Council as planning authority has obligations under the European Habitats Directive in that regard.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Coastal development has to be considered very carefully and in particular the area to the west of Nairn Golf Course covering Delnies. It is an isolated beautiful stretch of coast and as I understand it the Scottish Plan for coastal development does not permit development of these areas they are to be left in their natural state.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Scottish Wildlife Trust	Coastal Development: SWT believes that development in the sea must be managed as part of the new marine planning system under Marine (Scotland) Act. SWT prefer the alternative to the preferred option - mapping sensitive areas as a starting point. This is a much more strategic than simply doing an Environmental Impact Assessment according to the suggested approach to the Preferred Option.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Caithness Chamber of Commerce	Coastal Development: Agree with Main issues report but emphasise the urgency in identifying onshore locations for marine energy facilities (cross-referencing with the Coastal Development Strategy) so that proximity of smaller ports and harbours to the Pentland Firth is recognised.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34 [Do not agree with the Preferred Option.] Alternative necessary that would identify areas sensitive from scenic, ecological or environmental resources beyond aquaculture e.g. industrial or dense use producing extensive pesticide/fertilizer run-off.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Colliers CRE	Coastal Development: The development at Whiteness and its contribution to Coastal Development via its new Harbour should be identified in the Proposed Plan. There is a clear relationship between the site and its aquatic habitat and this tourism potential should be referred to within the Proposed Plan. The development at Whiteness and its impact upon the marine environment are issues that have been dealt with via the granting of outline planning permission. There are Management Plans that support the view that they developed site and Moray Firth with its habitat species can co-exist and complement one another. Therefore the Coastal Development Strategy should be reflected in the Proposed Plan with Whiteness to reflect the current position of developing this site.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Kirkhill & Bunchrew Community	Q34 KBCC prefers the stated alternative. There are too many poorly sited fish farms.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34 [Do not agree with the Preferred Option.] No. I disagree with the putting in place any policy ensuring any development appropriate or not is not hindered as this would leave the decision on what is or what is not appropriate to public bodies or individual planners. All development in coastal areas must have the same protection to ensure the safeguarding of fragile environments.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34[Do not agree with the Preferred Option.] Too vague. Agree with alternative - yes.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Ardross Community Council	Q34 We support the alternative, reason, to protect the visual environment etc.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34 Agree with the preferred option - yes. Ensure that recreational water users are consulted. The region offer some world class destinations for water users (e.g. surfers, sea kayakers etc). Ensure that the appropriate National Governing Bodies are consulted.	Cross-reference noted; to Development Plans Team for response.



Section	Organisation	Comment	Response
HWLDP	Private individual	Q34 [Do not agree with the Preferred Option. Do not agree with the stated alternative.] Strike a balance between coastal and inland development.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Inverloch & Torlundy Community	Q34 Agree with the preferred option. Don't quite understand why the preferred option and the stated alternative should be mutually exclusive.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Kingairloch LLP	Q34 [Do not agree with the Preferred Option. Do not agree with the stated alternative.] Close down/phase out all fish farming in tidal river estuaries and move offshore as has been done elsewhere.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Kingairloch LLP	We own property on 3 sides of a fish farm but have no say in the permitting process! Move all fish farming out of river estuary/sea loch situations and out into open sea. The evidence on the effect of fish farming to wild migratory fish is well-founded.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Flood Prevention/Coastal Erosion: This work should proceed with the utmost priority. Other plans will be fruitless if there is a threat of flooding or land instability.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Private individual	Q34 I support the Preferred Option but I also support the alternative which I see not so much as an alternative as a supplement.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Q34 [Do not agree with the Preferred Option.] Agree with the stated alternative. Emphasis on protecting the Inner Moray Firth from inappropriate development & industry.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Private individual	Coastal Development (page 68). 112. The draft refers to the Council's vision but does not describe it. The Coastal Development Strategy (CDS) is still in draft (and subject to separate consultation), and policy on marine renewables is also evolving, so the issues for development planning have not been fully identified. But the CDS does highlight the importance of the Highland coastal regions for landscape, tourism and recreation, and notes that development pressure is greatest on the east (Moray Firth) coasts. The HWLDP should echo this assessment, and shape development planning accordingly.	Cross-reference noted; to Development Plans Team for response.

Section	Organisation	Comment	Response
HWLDP	Private individual	Q34. We support the linkage with the CDS (first bullet point in the Preferred Option), and the intention (third bullet) to have a clear policy on aquaculture. But we reject the second bullet point, which proposed a peculiar kind of limited and double-negative planning control: development "...not hindered where it will not have an impact on any specific designation or the character of an area". This would be more logically expressed as a policy in which development will only be considered where it has no detrimental impact on the designation or character of the area. Safeguarding the region's very special coastal and marine assets requires no less.	Cross-reference noted; to Development Plans Team for response.
HWLDP	Lochardil & Drummond Community	Q34 Agree with the preferred option and the alternative. We think the alternative should be part of the Preferred Option.	Cross-reference noted; to Development Plans Team for response.