

Highland Coastal Development Strategy: Consultation Report

Ro-innleachd Leasachadh Cladaich: Aithisg co- chomhirleachaidh

May 2009
Ceitean 2009



PRODUCED BY THE PLANNING AND DEVELOPMENT
SERVICE, THE HIGHLAND COUNCIL

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1.0 Background

1.1 The Draft Highland Coastal Development Strategy (HCDS) was prepared in response to the Government's recommendation that local authorities should classify their coast for planning purposes using the principles set out in NPPG 13 (Coastal Planning). This required all coastline to be categorized into one of three categories: 'Developed', 'Undeveloped' and 'Isolated', for which there were corresponding national planning policies. The Council also decided to produce the strategy to support and complement the preparation of the Highland Wide Local Development Plan.

1.2 Under the new consolidated Scottish Planning Policy (SPP), published in February 2010, there is no longer a specific requirement for local authorities to produce this coastal classification. However, the SPP still refers to 'developed' and 'isolated' coasts so these categories are still useful. The Highland Coastal Development Strategy was also subject to the Strategic Environmental Assessment (SEA) process under the Environmental Assessment (Scotland) Act 2005.

1.3 It is proposed that the HCDS will form supplementary guidance to the HWLDP, which had a Main Issues Report (MIP) out for consultation at the same time. Thus, the HCDS was open to public consultation between August and November 2009. In addition, it was accompanied by a draft Environmental Report. It was publicised in local press and was presented at a series of road-shows around Highland, in conjunction with the Highland Wide Local Development Plan.

1.4 Comments were received from 39 different organizations or individuals. Of these, 24 were direct responses to the HWLDP consultation options only (see section 7.0). The feedback was split into over 260 individual comments which are tabulated in Appendix 1, along with the proposed Council response to each one.

2.0 Key themes and general comments

2.1 The coastal strategy is wide in scope and covers a large geographic area, so not surprisingly, the draft attracted a wide range of comments. The Council's initiative in preparing the strategy was welcomed and various organisations (e.g. SEPA and RSPB) commented favourably on the document's aims, clarity and balance. There was uncertainty in some quarters however about the scope and status of the strategy in relation to the HWLDP and some interests (e.g. the Moray Firth Partnership) felt that it did not go far enough in terms of providing area-specific development policies and guidance.

2.2 Topics where more detail would have been welcomed mainly involved coastal flood risk and erosion (in the context of forecast increases in sea level due to climate change) and the balancing of development with nature conservation interests in the inner Moray Firth. Also, certain organisations felt the document should have gone further to promote their particular interest and

some (e.g. salmon farming interests and renewable energy developers) were wary that the identification of isolated coast might constrain their prospects.

2.3 Some respondents commented that the linkage of the HCDS to other strategies, plans and developments could have been better. It was acknowledged however that the strategy provided a useful link between terrestrial and marine planning. Some felt that greater emphasis should be given to protecting and enhancing the environment whilst others thought that greater emphasis should be placed on assisting development, including greater clarity on how marine renewables will be dealt with.

2.4 The sections below provide a brief summary of the responses for each of the topic headings in the strategy. A detailed tabulation of the comments received and the proposed Council responses to them are shown in Appendix 1. The order of the final strategy document has changed, but this report follows the section numbering as per the draft document for ease of cross-referencing.

3.0 Main comments by topic/sector

3.1 AIMS

3.1.1 The aims of the HCDS were supported, although some felt that clarification was required on the status, scope and links to the HWLDP.

3.2 METHODOLOGY

3.2.1 One group of respondents thought that the landward boundary should perhaps be further than 1 km from the coast. However, this limit was set in accordance with national guidance.

3.3 COASTAL POPULATION

3.3.1 Some respondents suggested that further detail should be included in relation to proposed major developments which will have an impact on coastal areas, e.g. the A96 corridor. It was also suggested that the figures on potential impacts of sea level rise should be revised and these impacts should be assessed in greater detail.

3.4 TOURISM & RECREATION

3.4.1 Some respondents requested the inclusion of further detail on specific sites or tourist activities e.g. golf courses, coastal paths. However, as a strategic document, the HCDS can only provide some examples; it is outwith the scope of the strategy to include all venues and activities.

3.5 AQUACULTURE

3.5.1 Some felt that a more strategic approach to aquaculture was required, with links to the Council's Aquaculture Framework Plans. This option was considered when revising the strategy but it was felt that spatial planning guidance for aquaculture at regional scale would be so generalised that it would be of limited value. Also, the site requirements and impacts of different types and scales of aquaculture are such that generalised regional-level guidance would have to be subject to a range of caveats. The Council

believes that spatial planning guidance for aquaculture is most usefully delivered at local scale, via the current style of aquaculture framework plans, where there are significant development pressures. Outwith these areas, general planning policies in the HWLDP should provide guidance on the broad criteria against which development proposals will be judged.

3.5.2 The Scottish Salmon Producers Association felt the strategy was overly cautious towards aquaculture whilst there was a mixed response on the potential impact of this industry on wild salmonid populations. Some respondents thought it had a negative impact whilst the industry itself did not agree.

3.6 INSHORE FISHING

3.6.1 It was suggested that the title of this section should be changed to 'Inshore and Freshwater Fishing'. However, management of freshwater fish stocks is not a particularly coastal concern. Mention has instead been made in the text of the link between freshwater fish populations and use of the marine area. There was a call for more support for fishing activities.

3.7 OTHER COASTAL INDUSTRIES

3.7.1 More detail was requested on the potential for key sites at Kishorn and Nigg, along with other existing and proposed marina developments. One group of respondents was concerned at the reference to coastal superquarry potential having been identified at Loch Eriboll in the past. This potential has since largely been discounted so the reference to it was deleted.

3.8 WATER QUALITY

3.8.1 Some respondents felt that there was insufficient mention of River Basin Management Plans and links to other ongoing initiatives. In addition, it was suggested that the issue of flooding should be highlighted in a section of its own, given its importance and links to climate change.

3.9 ARCHAEOLOGY

3.9.1 One respondent thought there were insufficient links between archaeology and the economic benefits of tourism.

3.10 NATURE CONSERVATION

3.10.1 Some respondents felt this section lacked sufficient detail about key habitats and species in relation to potential development. In particular, treatment of the issue of boat traffic in the inner Moray Firth and bottlenose dolphins was viewed to be insufficient, along with links to the various national and local biodiversity strategies covering Highland. Some thought the protection given to key species and habitats should be strengthened through the planning process, whilst others felt that nature conservation was given too high priority in relation to other activities.

3.11 LANDSCAPE

3.11.1 SNH felt that greater consideration should have been given to 'wild land' in the strategy and the links between this topic and the 'Isolated' coast classification. SNH said this would be consistent with the HWLDP Main

Issues Report which proposed to identify wild land areas and afford protection to them.

3.12 ENERGY

3.12.1 Some respondents (e.g. the Crown Estate), felt that there was insufficient detail on offshore renewable energy developments, along with the supporting land-based infrastructure which may be required. Subsequent text amendments have sought to address this. Detailed policies concerning this issue are dealt with under the Council's Highland Renewable Energy Strategy and other ongoing work, but further links in the HCDS have been made.

3.13 CLIMATE CHANGE

3.13.1 This section was viewed by some to be one of the weaker sections of the strategy. It was felt that it did not contain sufficient detail on the issue of sea level rise which will inevitably lead to problems of coastal flooding and erosion on some parts of the Highland coastline, as identified in scientific research e.g. UKCP09. Further information has subsequently been added to the HCDS on the latest sea level rise prediction and SNH will provide new data on areas with a significant risk of coastal flooding for the HWLDP.

4.0 Sub-regional overviews

4.0.1 Suggestions were provided for specific sites and development opportunities and options to be considered across all three sub-regional coasts i.e. east, north and west, as well as region-specific comments.

4.1 EAST COAST

4.1.1 The section on this sub-region had by far the greatest number of comments, which is perhaps unsurprising given the level of development proposed for the area which will have a coastal impact. These mainly related to the level of proposed development along the A96 corridor and the implications for this section of coastline in relation to impacts on habitats, species and social issues.

4.2 NORTH COAST

4.2.1 The main comments received for this coast related to further tourism and renewable energy development potential and the need to further promote the local harbours' facilities.

4.3 WEST COAST

Clarification and additional detail was requested on aspects of renewable energy, impacts of aquaculture and landscape.

5.0 Classification Maps

5.0.1 There were a few comments regarding the classification of specific sections of coast but generally the classification was accepted. Comments on specific areas included Kishorn and sections of coast between Nairn and Inverness. However, the classification provides a snapshot of existing levels of development, as per the national guidelines and should not be seen as a barrier to future development in these areas.

6.0 Strategic Environmental Assessment (SEA)

6.0.1 Whilst some statutory organizations felt that the Environmental Report was sufficient, others felt it required further detail on some issues. The main concerns were: the lack of sufficient detail and links in relation to the potential impacts of climate change, mitigation measures being considered on issues that may not be applicable, the need to include updated site designation data and insufficient links to other strategies, policies and plans.

7.0 Highland Wide Local Development Plan

7.0.1 Alongside the consultation on the HCDS, the Main Issues Report for the Highland Wide Local Development Plan (HWLDP) was also out for consultation. This included a section on coastal development. The majority of comments were directly related to the options given, although there were some comments linked to the HCDS. These included the need to ensure close linkage between the two documents and concern by some that the area classifications may restrict development. These comments will be dealt with by the Development Plans Team as part of the HWLDP process.

8.0 Conclusion

8.0.1 The range and depth of comments received on the Draft Highland Coastal Development Strategy and its accompanying Environment Report have been welcomed. These constructive comments have been taken into consideration in the final version of the strategy.

Appendix 1

List of Consultees that responded with comments.

Organisation
Ardross Community Council
Caithness Chamber of Commerce
Colliers CRE
Dunnet Head Educational Trust
Golspie Community Council
HIE Lochaber
Historic Scotland
International Power Marine Developments Ltd
Inverlochry & Torlundy Community Council
Jones Lang Lasalle
Kingairloch LLP
Kirkhill & Bunchrew Community Council
Laid Grazings Committee
Lochardil & Drummond Community Council
Moray Firth Partnership
Nairn West Community Council
Phillips Aitchison limited
Private individuals
RSPB
Scottish Council for Development & Industry
Scottish Natural Heritage
Scottish Salmon Producer's Association
Scottish Wildlife Trust
Scottish Environment Protection Agency
The Crown Estate
WYG Planning & Design

Appendix 2

Table of individual comments and responses, grouped per HCDS topic order.