



Orkney Islands Council

Supplementary Guidance: Settlement Statements

Participation Statement and Consultation Report

19 January 2017

1. Introduction

The Council has decided to remove the detail of the settlements statements from the emerging Orkney Local Development Plan and form a separate Supplementary Guidance (SG). This will allow the detail of this Supplementary Guidance to be changed and updated throughout the lifetime of the emerging Orkney Local Development Plan.

Work on the pre-drafting of the settlement statement was completed within assistance from key agencies such as Scottish Natural Heritage and Scottish Environment Protection Agency and other planning stakeholders such as Road Services at the Council at the same time as the Proposed Plan policies were being drafted. The drafting process has been greatly informed by the Main Issues Report consultation outcomes.

The consultation on the draft SG: Settlement Statement ran at the same time as the Proposed Plan consultation from 5 May 2016 until 16 June 2016.

2. Consultation Methods

A. Public advertisement

- An official advertisement was placed in the Orcadian Newspaper on 5 May 2016 detailing the nature of the consultation, the consultation dates, the location of copies of the consultation documents and how members of the public could comment.
- The consultation was also reported on the Orcadian website and through OIC Updates Facebook page.
- A Press Release was issued at the beginning of the consultation period.

B. Public display of documents

- Copies of the draft Supplementary Guidance were made available at the OIC Customer Services One Stop Shop in Kirkwall, the Kirkwall Library and Archive and the Strommess Warehouse Building.
- Copies were also available to members of the public on request.
- Electronic copies were available on the Orkney Islands Council website.

C. Statutory Notification

- Letters or emails were sent to notify key agencies, planning stakeholders and members of the public who have previously stated an interest in development planning of this consultation. This was completed on the 5th and 6th May 2016. The notification informed all on the consultation period, where documents could be viewed and how / when comment could be made.

3. Analysis of Consultation

In total, the Council received 47 written or emailed representations on the Draft SG: Settlement Statement and the Proposed Plan. A number of the representations received affected both the Proposed Plan (through the Proposal Maps element) and the draft SG: Settlement Statements. Comments that requested directly or indirectly an amendment to a policy or proposal of the Proposed Plan that would materially change it, requires to be considered by a Scottish Government appointed Reporter through the Examination of the Proposed Plan.

Main Points:

- The Scottish Government has not commented on the draft SG: Settlement Statements.
- Scottish Environment Protection Agency (SEPA) considers the wording used for Kirkwall allocations K-23 (the Former Bus Station) and K-24 (Former Jewson's Site) as not appropriate in dealing with the flood risk (coastal, pluvial and fluvial) for these sites and would require to be changed. If wording is not changed, SEPA would object.
- Other comments from SEPA either support content or request minor changes
- Road Services have requested the use of Development Briefs and Transport Assessments for larger applications.
- Scottish Water has requested reference to their five growth criteria and their Pre-Development Enquiry procedure.
- OHAL has questioned some detail of housing allocations under their ownership
- RSPB would like reference to the draft SPAs for relevant settlements and the identification of all Local Nature Conservations Areas that are near to settlements and allocations.
- SNH has requested a new section for each Settlement Statement entitled Settlement Character looking at the settlement character.

Statistical Analysis:

Comment Numbers.	Analysis.
47.	Comments received for both consultations.
37.	Relevant to both consultations.
12.	Local residents have objected to Kirkwall allocation (K-17).
3.	Key agencies have commented (SNH, SEPA and HES).
4.	Planning stakeholders have commented (Scottish Water, OHAL, RSPB and Road Services at OIC).
2.	Elected Members have commented
16.	Members of the public have commented (not including K-17).
41.	Comments have been considered through the Examination.
32.	Unresolved Issues
18.	Unresolved Issues affected the draft SG: Settlement Statements.

4. The Examination Report Outcomes

As noted above 18 of the Examination's 32 Unresolved Issues affect the draft Supplementary Guidance: Settlement Statements. The Scottish Government's Examination Report was published on 30 January 2017. The Reporter's recommendations are generally binding. A redacted copy of the Examination Report is available in the Elected Member's Lounge, at Customer Services at the Main Kirkwall OIC Office and online at <http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=117649>

Three of the Unresolved issues have made a recommendation to change the Proposal Maps that and therefore the draft SG: Settlement Statements.

Relevant Unresolved Issues

Issue 21 - Kirkwall (K-17)

12 members of the public objected to this housing allocation.

Recommendation - Site K-17 should be deleted from the proposed plan as a housing allocation and designated as strategic open space.

Action for the draft SG: Settlement Statement – this allocation will be removed and the settlement statement Kirkwall plan amended to remove this allocation and designate it as strategic open space.

Issue 27 – Scorrodale

A member of the public asked for this rural settlement to be removed and considered the name Linnadale as not representative of the settlement.

Recommendation – The proposed plan should be modified by deleting the name Linnadale and titling Scorrodale.

Action for the draft SG: Settlement Statement – for the name of this settlement to be changes to Scorradale.

Issue 32 - Burnside (boundary change)

2 separate landowners requested amendments to the settlement boundary.

Recommendation - The plan should be modified at the southern end of the village in accordance with the plan attached to representation at B-A of the current local development plan in accordance with the plan submitted with representation.

Action for the draft Supplementary Guidance: Settlement Statement – for the Burnside settlement statement plan to be amended to take in the 2 boundary changes.

5. Further Amendments

The consultation report attached notes all amendments to be taken forward.

Main amendments

- Following the consultation, Development and Marine Planning have negotiated with SEPA on revised wording for Kirkwall allocations K-23 (the Former Bus Station) and K-24 (Former Jewson's Site). For both allocations this wording has been agreed with SEPA:

“Presently there are identified coastal, fluival and pluvial flood risks on this site. Any development proposal on this site would require a flood risk assessment to demonstrate that the site is not at risk of flooding or the risk can be managed without increased risk elsewhere. Depending on the outcomes of this flood risk assessment, it should be noted that the residential element of any mixed use development may be conditioned to only allow occupation after all flood risks have been successfully mitigated against in line with the planned measures for Kirkwall within the Orkney Local Flood Risk Management Plan.”

- In the Induction Section, a requirement for Development Briefs and or Transport Assessment, for development proposals within settlement boundaries which is it deemed to provide for better development outcomes has been inserted.
- In the Induction Section, Scottish Water's Pre-Development Enquiry procedure and their five growth criteria have been inserted.
- No reference to the draft Special Protection Areas or Local Nature Conservations Areas will be included as this information will be provided in detail in SG: Natural Environment.
- The Council will investigate with SNH the development of Settlement Character statements for each settlement in the future taking into consideration reviewed / revised Urban Design Frameworks and Masterplans.

6. Conclusion

Once the Proposed Plan has been adopted, this Supplementary Guidance (once approved) will be taken forward as statutory guidance that will sit at the same level of as the newly adopted Plan. Development and Marine Planning anticipate updating this Supplementary Guidance periodically to take consideration of newly produced development briefs, masterplans or urban design frameworks; and changes in circumstance. The only adverse comment from SEPA has been satisfied.

Orkney Islands Council

Draft Supplementary Guidance – Settlement Statements Consultation Report

Consultation Period: 5 May – 16 June 2016.

	<u>Unique Reference</u>	<u>Respondent Type</u>	<u>Issue</u>	<u>Comments</u>	<u>Response from Planning Authority</u>	<u>Action</u>
1.	00514	Interested Person		<p>I am very concerned with the introduction of a new settlement named Linnadale which is situated on Scorradales in your development plan that went live 5th May 2016</p> <p>My understanding of new settlement.. Is in the past it is been uninhabited.</p> <p>My property has been here for over a century.</p> <p>I have spoke to many people living in the area of scorradales, they are all ignorant to the planning proposal of 16 houses on scorradales Rd because you have named it Linnadale...</p> <p>Linnadale is a croft quite some distance...</p> <p>██████████ owns it and out of greed has introduced 3 properties..</p> <p>A settlement is also where people might share common interests..</p> <p>I do not see that.. As there is nowhere here you could possible stop and speak to neighbours as the road takes up priorities.</p> <p>No pavements and the sweeping bend steep gradient that locals are over familiar with racing like idiots. And no one is enforcing the dangers of this corner... Or enforcing speed limits..</p> <p>How is anyone going to make comment if you have not named the planning development on the Scorradales Rd.</p> <p>I expect you must also inform the residence there area has changed name.. My addresses is ██████████ on the</p> <p>██████████</p> <p>Not</p> <p>██████████</p> <p>Please can you make amends to your plan so people can possible make the first impression ie understand where you are proposing to build..</p>	<p>This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 27 - Scorradales. The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.</p>	

2.	00441	Interested Person		<p>C5 Assessment of West Mainland – Finstown page 31, MIR Option 2: Site 7 hasOn the east side of the Hill of Heddle road. – Should this be East side of Heddle Road?</p> <p>C5 Assessment of West Mainland – Finstown page 33, Comment column: Bats are known to be present..... YET Supplementary Guidance: Settlement Statements – Finstown page 22: Natural Heritage 053 Bats may be present..... It is well known that bats are present in this area.</p> <p>Supplementary Guidance: Settlement Statements – Finstown page 22: Natural Heritage 054 the TPO does not include the woodland area W1.</p> <p>Supplementary Guidance: Settlement Statements – Finstown page 23: Design Guidance 057. The Masterplan will be 7 years old by the time this LDP is adopted. It is stated that it will be reviewed and updated throughout the lifetime of this plan therefore can the design strategy for Finstown be summarised as listed without this review taking place?</p> <p>Supplementary Guidance: Settlement Statements – Finstown page 24: Housing Allocations: F-3 and F-4 Development of this allocation should not..... Could 'must' inserted here?</p>	<p>Your comments here are noted. In a revised version of this Supplementary Guidance, it will be amended to note that bats are present in this area.</p> <p>The Natural Heritage Section is an over view of natural heritage assets and not a exclusive section. The Council anticipates that existing Tree Preservation Orders within Orkney will be reviewed and new trees and woodland planning policy guidance will be taken forward after this.</p> <p>The Finstown Masterplan (one of the Three Villages Masterplan) is a material consideration in the determination of a planning application and does not gain more weight if summaried in the Supplementary Guidance. When this masterplan is updated, elements of the Finstown Settlement Statement will be updated accordingly. Note also that this updated document will be a material consideration once approved.</p>	
3.	00520	Interested Person		<p>I refer to the final consultation in respect of the Local Development Plan, and in particular the settlement statement for Burnside Harray.</p> <p>I am the owner Site 1 Burnside, Harray, which forms part of site B-A.</p> <p>I would respectfully request that the settlement statement be amended to show an extension to the area of site B-A, such that the north east development line as currently marked on the settlement map is moved back (north east) so that it runs in a straight line from the rear (north east) boundary wall of Holland House to meet the corner point of site B-E.</p> <p>I am requesting this amendment so that dwelling houses built on site B-A have the opportunity to utilise this additional area of ground as private amenity space, given the topographical constraints (steeply sloping) of the lower third of the site which borders the public road.</p>	<p>This proposed modification to add additional land to the Burnside Rural Settlement Boundary has been taken forward in the examination process with the Scottish Government through Issue 32 - Burnside (boundary change). The Scottish Government's appointed Reporter has considered the planning case and has recommended to take forward this boundary change. The findings of the Examination Report are binding.</p>	
4.	00004	Elected Member		<p>As mentioned to you are your recent planning workshop, the name given to one of the new Orphir settlements has caused some debate as there is already an area commonly called Linnadale in Orphir (the hillside location at the northern end of Petticoat Lane). The proposed zoned housing areas are located at the eastern end of the Scorradale Road and locally is already identified/called "Scorradale". The existing settlement cluster is generally spoken of as Scorradale, the developments proposed can simply be an extension of the existing settlement of Scorradale.</p>	<p>This is noted and the name of the rural settlement will be amended.</p>	

5.	00521	Interested Person		<p>We are concerned that the Local Development Plan includes K1 and K2 zones for housing. We live in Hatston Park and K1 particularly will have a significant impact on us.</p> <p>Change of Character - Hatston Park is a semi-rural location close to the amenities of the town but still in the country. If houses are built in K1 we will be enclosed in a housing estate.</p> <p>Light Pollution - As a private estate the residents of Hatston Park have always resisted street lighting because we enjoy being able to see the stars on dark clear nights. Housing in K1 and K2 will presumably come with street lighting which will destroy that.</p> <p>Loss of Amenity - One of the main amenities of our house is the view over Kirkwall Bay and out to the North Isles. This will be completely lost if houses are built in K1.</p> <p>Access - The road into Hatston Park is un-adopted. We have recently spent a lot of money re-surfacing it. What will happen to it if houses are built in K1 and the neighbouring field?</p> <p>Our Home - As I write this I am sitting in the conservatory looking out over Hatston Pier at HMS Duncan heading for the Hampshire memorial. If houses are to be built in K1, the best I could hope to see from this seat would be the back of somebody's house. Over the years we have spent a lot of time and money getting our home the way we want it. If this goes ahead we would have to think seriously about moving, something we may not be able to do since development in K1 is bound to devalue our house.</p>	<p>This proposed modification to remove these 2 allocations noted has been taken forward in the examination process with the Scottish Government through Issue 22 - Kirkwall (K-1 K-2). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning these allocations will not be removed as allocations within the Kirkwall settlement boundary. The findings of the Examination Report are binding.</p>	
6.	00064	SNH		<p>SNH welcomes the opportunity to make comments and representations on the Orkney Local Development Plan – Proposed Plan. We have been engaged in the production of the Main Issues Report and the Proposed Plan and also several pieces of the Supplementary Guidance. I'd like to thank you and your team for enabling us to work with you on several aspects of the plan. We have been impressed with the collaborative approach you have sought from the outset. This gave us significant opportunities to influence the proposed plan and we hope we will be able to continue this collaborative approach during the development of the forthcoming Supplementary Guidance. In this letter, we have combined our response to the consultation on the Orkney Local Development Plan and the Habitats Regulation Appraisal. We have delineated the key parts of the response (Parts 1 and 2) so you can more easily relate specific parts to the two discrete consultations. We will respond separately to the Strategic Environmental Assessment updated Environment Report. We are pleased that many of our earlier comments have been reflected in the Proposed Plan. Many of our representations are points of detail which we hope can easily be addressed as minor modifications to the plan. We are keen to show our support for many of the policies contained within the plan. We are very supportive of the strong emphasis that this plan places on the natural heritage assets of Orkney. We commend the clear links between the vision, the policies and supplementary guidance, all of which make clear the need to protect the</p>	<p>SNH's support through the review of the Local Development Plan is noted and appreciated by the Council.</p>	

				environment in parallel with developing Orkney's economic future	
7.	00064	SNH		<p>Supplementary Guidance Settlement Statements</p> <p>We are very supportive of the use of settlement statements to inform and explain site specific design guidance. As presented, what we consider that is lacking, is a paragraph or two introducing and discussing the existing settlement character (and what is characteristic/positive and/or unique) that the Council wish to retain and reinforce through the design guidance. After the general description, a new section entitled 'Settlement Character' (or similar) would provide the basis of existing settlement and townscape character upon which the design guidance is then drawn. Aspects such as (in this instance) could include form of the bay; landform and elevation; orientation; extent of shelter; character of settlement edges; character of housing and existing curtilage design. This then would then underpin and explain the aspects of design such as orientation, scale, massing, frontages, and building heights, introduced in the guidance. We would be able to help develop this with you. We found the information in the previous settlement statements useful and could be a useful starting point.</p>	<p>SNH's comments are noted here. The Council would consider that this has been covered in part in the draft Supplementary Guidance and would like to discuss this further with SNH to see how this take be taken forward.</p>
8.	00013	Elected Member		<p>Comment from Consultee</p> <p>Tried to get a hold of you yesterday Stuart but you weren't about. A couple of points on Dounby and round about.</p> <p>I've had a few folk raise the wish to see some sheltered housing type of development closely associated with Smiddybrae. Possibly in space at back adjacent to old kirk. I think I may have mentioned it myself before.</p> <p>I have some concerns about the possible housing area out the swartland road at Saither as it seems to be starting yet another ribbon development and dounby has too much of that already. Could some thought be given to changing the shape of the area within that field. (Along the Dounby side of the field and not along the road)</p> <p>Response from Officer</p> <p>Thanks for the comments Councillor,</p> <p>I will pass them on so they are logged and you will get an acknowledgement. I think the idea of linked housing near Smiddybrae is positive and we can certainly look at how land around the Swartland Road will be developed - it could be that only a portion of the field contains housing and that open space keeps ribbon development to a minimum. The detail on how the land would be developed will be contained in the updated Dounby Masterplan but I will also feed your views into the draft guidance on the Settlement Statement which is currently out to consultation. If you think the area should not be allocated, we can pass this on to the reported as an unresolved issue as we cannot amend boundaries ourselves now. If the reporter agrees, they can instruct us to change it.</p> <p>Comment from Consultee</p> <p>Thanks Stuart, I have no problem with the part of the Saither field being allocated, its just the shape of the strip along the road and Dounby has enough ribbon dev already without us creating one on the only road of the five that leads to dounby that doesnt have one.</p>	<p>Your comments are noted and will be fully considered when The Dounby Masterplan is reviewed in 2017 / 2018.</p>

9.	00522	Agent		<p>On behalf of the above named client I would ask that the area of land, as outlined on the attached plan, be included in the Proposed Orkney Local Plan, as available for housing.</p> <p>In support of this request I would offer the following comments and opinions.</p> <p>It is well known that there are major issues with domestic drainage in the area from the north of Craigiefield Park to Greenfield and that SEPA are currently unwilling to accept any new housing development, within this area, until such time as Scottish Water extends the existing mains drainage system beyond Craigiefield Park. The possibility of Scottish Water undertaking this work would appear unlikely in the foreseeable future. Should the area in question by earmarked for housing, in the proposed Orkney Local Plan, the development of this land could be beneficial to the wider area as a whole. Any sizeable development will require a pumping station, on site, feeding back to Scottish Water's station on the Kirkwall side of Craigiefield Park. The installation of such will, undoubtedly, be the responsibility of the developer but Scottish Water have indicated, in the past, that they are willing to work with developers, where the opportunity arises to extend or upgrade the existing foul drainage system. It would be very straightforward for the developer to lay an additional pipe, running from the north of the Craigiefield Park back to the new pumping station, at the same time as running a pipe from their station to Scottish Water's station. This would offer an opportunity for all houses, currently discharging to a septic tank, to connect to the main sewer via the new pumping station.</p> <p>Although this letter relates to the area coloured red only it would be of further benefit, for obvious reasons, if the two areas coloured blue were also designated for housing.</p>	<p>This proposed modification to add the land noted as a short term housing allocation within the Kirkwall settlement boundary has been taken forward in the examination process with the Scottish Government through Issue 20 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as a short term housing allocation within the Kirkwall settlement boundary. The findings of the Examination Report are binding.</p>	
10.	00523	Interested Person		<p>Many thanks for your trouble - but that link is only what local residents have already so very recently discovered, and i had hoped for a bit of detail; anyway, when first viewing the map, the very pale blue outline of K17 doesn't exactly leap out for attention except at highest magnification, especially given over-optimistic assurance from the Weyland Bay 2014 Brief re coastal flood risks, the sewage pumping station and "development to the east of the pumping station is not supported";</p> <p>As a result local residents were not looking out for housing development in such an improbable site as wet, smelly, dangerously high-speed, blind-cornered, single-road-bound K17, and have been rather taken by surprise at the idea of as many as 50 houses there !; surely it could be far better developed, along with long needed pedestrian-/bicycle-/pram-/horse-friendly rationalisation of the roads, for wider extension of the basic public amenity provided by the(fast eroding) artificial coastal "green"? - perhaps on mini-lines of the very successful peerie sea area?;</p> <p>As kirkwall bay east side housing development continues to grow, and more and more local and central town dwellers take to the outdoors for recreation and exercise, the need for more easily accessible green lung space becomes ever greater; there is</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

				<p>really no need to cover the entire immediate bayside with concrete and tarmac when there is no shortage of potential housing sites just a little further inland (other council-owned, or from local farmers only too eager to sell.....).</p> <p>Or does the current drainage work at the craigiefield shore suggest that there is a housing fait accompli?</p> <p>could this email count as a valid extension of my 13 June hand delivered letter?</p>		
11.	00523	Interested Person		<p>I doubt that many Councils in the land encourage apparently high density building in an area the lower region of which:</p> <ul style="list-style-type: none"> - acts as a "flood meadow" for freshwater drainage from badly managed fields above (in the past providing a nice little winter skating rink); -before the now-eroding "green" was constructed, was also liable to salt water flooding at high tides; (and which might yet be at further risk from unanticipated side effects of rising seas and the town centre flood protection scheme); -was already hosting a pungent, noisy, Sewage Pumping Station. <p>Add to all this the wholly unsuitable Carness and Craigiefield roads for even the present traffic, especially their popularity with highly dangerous private and commercial drivers with complete ignorance of, and disregard for, the safety of pedestrians, cyclists, pram-pushers, horses, etc. And what about the notorious blind corner at the CarnessjCraigiefield Roads junction?. And the unregulated speeds?. And the history of flash flooding down the Craigiefield Road from those badly managed adjacent fields ? Will it all be magically transformed into a properly policed and drained wonderland?</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
12.	00523	Interested Person		<p>Then consider the present recreational value of the Carness/Craigiefield/Work Roads circuit for townsfolk, tourists (this is a busy bed and breakfast and self catering area), cruise ship watchers and sauntering passengers alike; (and not forgetting the numerous dogs...). And work out how that aspect could so rewardingly be developed further, for instance by retaining a really wide region of permanently scheduled "open space" all along the K17 roadside boundaries. That, with suitable appropriate planting (avoid planners' plants, and see Craigiefield cottage garden for proven "ordinary" trees and bushes for the area), would add greatly to a wel come expanded pedestrian-friendly green lung on this side of Kirkwall- and also wave a flag for OIC's conservation credentials?</p> <p>However, I fear that this newly and somewhat hastily revealed change in the great big Council Plan has maybe surfaced simply because finance and land happen to be available- a tactic which has led OIC into trouble in other recent circumstances, as we all know. Or perhaps it was triggered by the applications for planning permission for Sinclair's similarly flood-prone field further along the Carness Road? Or maybe it is all part of a yet bigger plan for this side of Kirkwall - 1 once heard of dreams of a splendid raised multi-Jane highway over the bay?</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

				Of course more public housing is needed, especially given how much good stock was mindlessly sold off. Sensitively planned and managed, the K-17 site could offer much more to concrete Kirkwall than high density, box-ticking, flood-prone, car-beseiged people-containers?		
13.	00524	Interested Person		<p>My name is xxxxx and I have lived in Craigiefield Park for almost 24 years and during that time I have witnessed some serious floods in that particular area.</p> <p>I would like to make some comments on the proposed development plan for the areas marked K-16 and K-17.</p> <ol style="list-style-type: none"> 1. The Carness road which borders the above areas has been awash with water runoff from the land and floods with spring tides and westerly gales. The level of the water has been higher than the dry stone dyke at the K- 17 area. This road is impassible at Weyland when there are spring tides and westerly gales. 2. The sewage pump house is noisy and emits an awful smell, I can both hear it and smell it form my house if the wind direction is favourable and I live almost 0.5 kilometers from the pump house. 3. There is the main sewage pipe that runs directly through the K- 17 area as it makes it way to the the treatment plant at the Head of Work. 4. There is also a sewage pipe that runs from approximately from the main entrance to Craigiefield Park this pipe empties the 'wet well' at Craigiefield Park and joins into the main sewage pipe (the one mentioned above) 5. Craigiefield road is a single track road which is unsuitable for increased traffic and it is also prone to flooding especially between Dr D's motorcycle garage and Mr and Mrs Scholes's house, the drainage is unable to cope with the runoff. The field between the two properties are also flooded in the winter as they are low lying and approximately 1.4 miles north of the Craigiefield road there is a small loch which increases dramatically in size with the rain and runoff from the higher surrounding ground which contributes to the fields flooding. 	This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.	
14.	00525	Interested Person		<p>Please find attached an indicative layout plan of the above showing the possibility for creating 22 house sites, rather than ten. Mr xxxxx did talk to Roads Services a few years ago and, at the time, they did confirm they might consider a new access where shown. Most of the sites are in the region of 0.1ha. There is, of course, no mains drainage in the area, therefore, treatment plants would be required for X number of houses at a time.</p> <p>(Location plan included with the submission)</p>	This proposed modification to increase the notional density for the Dalespot allocations has been taken forward in the examination process with the Scottish Government through Issue 29 - Dalespot (density increase). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made to the notional density levels. The findings of the Examination Report are binding.	
15.	00526	Interested Person		<p>We wish to raise the followings objections/concerns in relation to the suggested development for housing in the area referred to in the Development Plan as K17.</p> <p>Our concerns are itemized below:</p> <ol style="list-style-type: none"> 1. Danger of Flooding - The Weyland Development Brief, published in 2014, advises against development to the east of the pumping station because it is likely to flood. "Development to the East of the Pumping Station is not supported due to the fact that this Is at a 	This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.	

				<p>high risk of flooding." It can be seen clearly on the map that the area susceptible to flooding is between a third and a half and understandably, the area nearest the sea is more at risk. Similar statements are made in the Strategic Environment Assessment/Appendix C3</p> <p>"Around one third of the site lies below the 5 metre contour and may be at risk of coastal flooding. 1 in 200 year coastal flood level is estimated to be 3.23m AOD. Although the site is adjacent to the flood map, this doesn't take account of wave action, overtopping or climate change. Information suggests the site is susceptible to long term coastal erosion." (accompanied by a red label indicating a significant consideration/danger). It is also noted that there is a photograph available of the site in a state of flood as recently as 2005.</p> <p>We are aware that the field in question is waterlogged to the extent that there is a significant amount of surface water in the winter months every year. We are also aware, and have been affected by flooding of the road in bad weather during the winter, when warning signs are put up for motorists. With more housing will come more cars and more chance of accidents on these occasions. An increase in manmade surfaces is likely to increase surface water run-off interfering with its natural ability to be absorbed into the soil pores and become through-flow.</p>		
16.	00526	Interested Person		<p>2. Weyland Development Brief also states that the area now known as K17 is outwith the 15 minute walk zone to primary schools although it now appears that this has extended to between 15 and 20 minutes. Young children are likely to find the walk to the nearest primary school, Papdale, beyond their capacity, especially as it will be twice a day and part of the route to be followed does not currently have a pavement. This may be a particular problem for parents of nursery children who do not have transport.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
17.	00526	Interested Person		<p>3. The site of the pumping station is currently on the edge of the built up area. The proposed development would mean that it would be surrounded by houses -not a pleasant sight for occupants nor an appropriate location for a facility that can be noisy and smelly.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
18.	00526	Interested Person		<p>4. Currently Craigiefield Road is a single track road with passing places. It is already overused and it is unlikely that it will be able to cope with the additional traffic, especially as many households today have more than one car. There is also likely to be a significant increase in the number of heavy vehicles, a problem that is already of concern to local residents, in respect of personal safety and road capacity. The corner at the lower end is particularly hazardous as it has two bends in close succession. Earlier this year a lorry spilled its entire load of fish waste all over the road at this point.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
19.	00526	Interested Person		<p>5. Craigiefield Road currently forms part of a walking circuit for a significant number of people, many accompanied by their dogs. It is also used by cyclists and horse riders. It is a significant rural amenity corridor marking the boundary between town and country, providing a pleasant environment for these health promoting leisure activities.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

20.	00526	Interested Person		<p>6. Should the road be widened to accommodate two lanes, we will lose a significant biosphere containing a wide variety of plant life that has developed over many years along the verges of the road. It will also make it more hazardous for those living adjacent to the road.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
21.	00527	Interested Person		<p>I write to you re my area of ground in the Garson area, which I would like to put forward from the 2014 plan to the proposed plan for 2016. I wish to use it for housing as it has access from the road, has flat terrain and good drainage with no flooding issues.</p> <p>I am in contact with a planning agent and hope to lodge a plan shortly.</p>	<p>This proposed modification to add the land noted as a short term housing allocation within the settlement boundary of Stromness has been taken forward in the examination process with the Scottish Government through Issue 25 - Stromness (Land at Garson). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not be allocated for short term housing. The findings of the Examination Report are binding.</p>	
22.	00528	Interested Person		<p>Following our conversation with one of your planning officers on the 14th April. I can confirm our intention would be to have the above property remain on the local development plan for 2017.</p>	<p>Your comment of support is noted.</p>	
23.	00054	OIC Roads		<p>The following report provides comments from Roads Service in relation to the consultation documents for the Draft Supplementary Guidance on the Settlement Statement dated 5 May 2016.</p> <p>In the previous consultation response on 15 September 2015 Roads Services emphasised the need for Development Briefs, Transport Assessments and for the developers to engage and consult with Roads Services at the earliest opportunity. It was also stressed that individual accesses and driveways should not be encouraged onto A or B class roads and existing farm tracks and access roads should be upgraded to the required standard. This and a number of other concerns and issue raised do not appear to feature in the recent Draft Supplementary Guidance: Settlement Statements.</p>	<p>Roads Services comments are noted. The requirement for additional information with a development proposal requires to be proportionate to the development proposal in type and size etc; and for this additional information requirement to add value to the end outcome. In the introduction section to the Supplementary Guidance: Settlement Statement an extra section has been added to encourage pre-application discusses and that the Council as the planning authority reverses the right to request a development brief and / or a transport assessment for an area of land within a settlement boundary or for a development allocation. At Policy 14 - Transport, Travel and Road Network Infrastructure, part B - Sustainable Travel of the Proposed Plan it states that "Proposals that involve significant travel generation by virtue of their size or nature must provide a Transport Assessment to explain how the development will incorporate sustainable travel options (active travel, public transport and low carbon vehicles) and how they will integrate with existing infrastructure / networks."</p>	
24.	00054	OIC Roads		<p>Roads Service would request that the Introduction includes a section relating to Roads. This should be along the lines of the following paragraphs although Roads Services are happy to discuss the content in detail.</p> <p>The National Roads Development Guide (NRDG) sets out standards required for new developments, these standards apply on the mainland and outer isles. Developers should engage in dialogue with the Council's Roads Services at the earliest opportunity. Consideration must be given at all stages of development with regards to the existing roads infrastructure and drainage facilities.</p> <p>Development briefs will be required for sites of more than 3 dwellings the developer will be required to pay for all improvements identified as necessary to permit development. Prospective developers should be required to carry out relevant Transport Assessments for each</p>	<p>Road Services comments are noted. The National Roads Development Guide is a material consideration in the determination of planning applications and is noted in Policy 14 of the Proposed Plan. In terms of Development Brief and Transport Assessment requirements please note previous comment. In terms of developer contributions, this requirement will be addressed through site specific development briefs. In terms of SUDS information please note Policy 13 - Flood Risk. SuDS Waste Water Drainage of the Proposed Plan.</p>	

				<p>site. Individual accesses and driveways should not be encouraged onto A or B class roads and existing farm tracks and access roads should be upgraded to the required standard.</p> <p>Developers may be required to agree to a planning bond and planning gain through a section 75 agreement. All proposals must now consider SUDS as an integral part of any development. Where these will connect to an existing road drainage system the developer will require pay to upgrade the infrastructure as deemed necessary.</p> <p>Developers will be required to provide SUDS assessments and provide full attenuation or consider upgrading the existing drainage system where appropriate; reference should be made to SUDS for Roads.</p>		
25.	00054	OIC Roads		<p>It is also noted that whilst each settlement has identified sites there is also the potential for development on any area of land within the boundary of the settlement. No development should be permitted within the boundary of the settle areas without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Developments will put an increased demand on an ever shrinking budget. Therefore additional funding for long term maintenance will need to be built into any programme for improvements or provision of new infrastructure.</p>	<p>Road Services comments are noted. These considerations are part of the development planning and development management processes. Please note the policies within the emerging Plan (Proposed Plan) will be used to shape a proposal and allow for appropriate development.</p>	
26.	00054	OIC Roads		<p>Burnside - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Problems have arisen following development of the current sites on Church Road associated with flooding in this area. Any further development must look to improve the surface water drainage and associated outfalls. SUDS must be considered as part of any development.</p>	<p>Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.</p>	
27.	00054	OIC Roads		<p>Burray Village - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.</p>	<p>Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.</p>	
28.	00054	Interested Person		<p>Dalespot- As previously stated no new accesses would be permitted on to the A961. Proposed capacity of 10 sites would require the upgrading the private road to a higher standard, potentially for adoption and would require Traffic Statement and Development Brief. There are no major concerns associated with flooding in this area, but SUDS must be considered as part of any development.</p>	<p>The settlement statement for Dalespot has been amended to make reference to these points.</p>	

29.	00054	OIC Roads		Dounby - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
30.	00054	OIC Roads		Evie School - Infrastructure improvements including new footways, street lighting upgrades and the upgrading of existing drainage infrastructure would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
31.	00054	OIC Roads		Evie Village - Given the proposed capacities infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
32.	00054	OIC Roads		Finstown - Finstown has a good network of public roads with associated footways and street lighting however given the proposed capacities each of the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. Sites F1- F3 would require a Development Brief and Transport Assessment. All development sites would need to be sympathetic to existing drainage issues with SUDS being introduced to the schemes.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
33.	00054	OIC Roads		Herston - Infrastructure improvements would be required as part of the development of this site.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
34.	00054	OIC Roads		Hillhead - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
35.	00054	OIC Roads		Houton - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement	

				and potential development of adjacent sites. Development will impact on the Harbour area and as such A Development Brief and Transport Assessment should be submitted for the proposed sites outlining the full extent of the proposals.	Statements should not duplicate and restate existing policy provision. Considering the Harbour Area for a development proposal within this rural settlement has been noted in a revised version of this Supplementary Guidance.	
36.	00054	OIC Roads		Kirkwall - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Traffic Statements and or Assessments and Development Briefs will be required for each of the sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision. Development Briefs are a requirement of the majority of allocated sites in Kirkwall.	
37.	00054	OIC Roads		Lighthouse Corner, Deerness - Given the proposed capacities for the three identified sites, there are no major concerns. However development within the remainder of the settlement could have an impact on the existing infrastructure. Therefore improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure may be required. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Traffic Statements and Development Briefs will be required for each of the sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
38.	00054	OIC Roads		Linnadale, Orphir - Given the proposed capacities infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
39.	00054	OIC Roads		Lyron - Given the proposed capacities infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
40.	00054	OIC Roads		Madras - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. No individual accesses would be permitted onto the A986.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
41.	00054	OIC Roads		Norseman - Development Briefs are required for any proposed sites outlining the full extent of the proposals, with developers carrying out	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the	

				relevant Transport Assessments. The capacities identified would require infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
42.	00054	OIC Roads		Orphir Village - Development Briefs should be submitted for the proposed sites outlining the full extent of the proposals, with developers carrying out a Transport Assessments for each site. The capacities identified would require infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
43.	00054	OIC Roads		Quoyloo - Development Briefs are required for any proposed sites outlining the full extent of the proposals, with developers carrying out relevant Transport Assessments. The capacities identified would require infrastructure improvements including new footways and street lighting upgrades would be required as part of each of these development sites. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
44.	00054	OIC Roads		Scapa Brae - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. No individual accesses would be permitted onto the A964.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
45.	00054	OIC Roads		St Margaret's Hope - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. All development sites would need to be sympathetic to existing drainage issues with SUDS being introduced to the schemes.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	
46.	00054	OIC Roads		St Mary's Village - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. All development sites would need to be sympathetic to existing drainage issues with SUDS being introduced to the schemes.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.	

47.	00054	OIC Roads		Stenness - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. No individual accesses would be permitted onto the A965.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision. It has been noted in a revised version that no new individual accesses will be permitted onto the A965.
48.	00054	OIC Roads		Stromness - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Traffic Statements and or Assessments and Development Briefs will be required for each of the sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.
49.	00054	OIC Roads		The Palace - Comments have been include for this area relating to road improvements, however it should be reiterated that given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. No individual accesses would be permitted onto the A966	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision. Revisions to the Supplementary Guidance will note for the Palace that no new individual accesses will be permitted onto the A966.
50.	00054	OIC Roads		Tingwall - Given the proposed capacities for the two identified sites, there are no major concerns. However development within the remainder of the settlement could have an impact on the existing infrastructure. Therefore improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure may be required. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. Traffic Statements and Development Briefs will be required for each of the sites.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.
51.	00054	OIC Roads		Toab - Given the capacities proposed all the sites will require infrastructure improvements including new footways, speed limit extensions, street lighting upgrades and the upgrading of existing drainage infrastructure. No development should be permitted without consideration being given to its effect on surrounding infrastructure and potential development of adjacent sites. No individual accesses would be permitted onto the A960.	Road Services comments are noted. Considering road, surface water requirements and other infrastructure requirements (on the site and the surrounding area) is part of the planning application process with relevant policies of the Proposed Plan and other material considerations. The Supplementary Guidance: Settlement Statements should not duplicate and restate existing policy provision.

52.	00054	OIC Roads		<p>The Isles (Eday, Egilsay, Flotta, Graemsay, Hoy and South Walls, North Ronaldsay, Papa Westray, Rousay, Sanday, Shapinsay, Stronsay, Westray and Wyre) - Roads in the island settlements are relatively narrow with limited footways and associated street lighting. The type and scale of developments will determine if it is necessary to consider improvements. Any requirements would be identified in a development brief or Transport Assessment provided for each location to help control but also encourage growth in these areas. Future developments would also be required to address any surface water drainage issues in the settlements. SUDS must be considered as part of any development.</p>	Road Services comments are noted. In the introduction section of the Supplementary Guidance: Settlement Statement will be noted that a Development Brief and / or a Transport Assessment.	
53.	00054	OIC Roads		<p>Conclusions - These proposals will put an increase demand on a shrinking budget. Therefore long term maintenance will need to be built into any planned works for road and street lighting replacement. The introduction of planning bonds and planning gain is therefore crucial to the future maintenance and improvements of the road network. Transport Assessments should be carried out where appropriate and as required prior to any major developments, with consideration given to traffic regulation orders where appropriate. The developer will be required to provide SUDS assessments and provide full attenuation or consider upgrading the existing drainage system where appropriate.</p>	Roads comments are noted.	
54.	00062	SEPA		<p>Thank you for your consultation email which SEPA received on 5 May 2016 highlighting the publication of your Proposed Plan (hereby referred to as the Plan). Our representations are provided below.</p> <p>Appendix 2 provides a summary and table detailing our assessment of the Proposed Plan Supplementary Guidance (SG): Settlement Statements. As a result of earlier engagement we welcome the fact that there are no allocations in the Plan to which we have an in-principle objection. Unfortunately however there are two sites we object to as we consider the individual allocation wording is not currently appropriate and an amendment to the wording would be required to enable us to support them.</p> <p>Where we have supported policies/sections of policy/allocation wording we would very much welcome being informed, if, following the end of the consultation period, there are any proposed modifications to these. Our separate response to the Environmental Report, via the SEA gateway (our reference PCS/146707), should be considered alongside this response.</p>	Noted	
55.	00062	SEPA		<p>Appendix 2: SEPA's assessment of the Proposed Plan Supplementary Guidance (SG): Settlement Statements</p> <p>17. Settlement Statements</p> <p>17.1 For most of the allocations we provided comments on in the Main Issues Report, appropriate wording has been included in the SG. Additional local information appears to have been incorporated for a number of sites which we consider adds significant value.</p>	Noted.	

56.	00062	SEPA		17.2 As highlighted above unfortunately however there are 2 sites, highlighted in orange in Table 1 below, in the proposed plan were we consider the wording is not currently appropriate and an amendment would be required to enable us to accept them. The sites are K-23 (Former Bus Station) and K-24 (Former Jewson's Site). We accept the proposal to restrict occupation of any residential development on both sites until after the Kirkwall Harbour Flood Scheme is completed and operational.	We note SEPA's concerns with the wording for these central Kirkwall sites. The Council appreciates SEPA's advice and assistance in dealing with flooding matters in Orkney and in particular central Kirkwall. Central Kirkwall is socially and economically an important part of our island and we wish to enable appropriate development that is in line with Scottish Planning Policy and the Flood Risk Management (Scotland) Act 2009.	
57.	00062	SEPA		17.2.1 Our outstanding concern for both sites once the flood defences are complete, is the remaining risk of flooding from a combined fluvial (from small watercourses) and surface water sources. This is supported by the mitigation requirement in the Environmental Report (ER) "that residential development will not be possible on sites K-23 and K-24 until works are in place to reduce flood risk from both coastal and fluvial sources to no greater than 0.5% annual probability of flooding." Note: there is a spelling error in the proposed settlement text for both these – deference (defence).	We note SEPA's comment.	
58.	00062	SEPA		17.2.2 We are aware that under the forthcoming Local Flood Risk Management Plan there will be actions to reduce flood risk from this combined source, and this is noted in the settlement text. We also note that these actions may take place and successfully reduce flooding within the lifetime of the local plan, though the extent to which that will be possible is not known until more detailed modelling of the flood sources is undertaken (the first action which will then inform any further work). Flooding from these sources currently poses a considerable risk to the development sites and significant flood depths are likely.	The current flood risk for central Kirkwall is noted.	
59.	00062	SEPA		17.2.3 The text proposed "Any proposal for this site must fully consider the use of surface water drainage measures to have a better effect on the drainage flooding issues" is not adequate to ensure that people and property will not be placed at risk from the impacts of flooding. Any application would have to be supported by information to demonstrate that the risk of flooding had been reduced to such a level that it could be effectively managed, without increasing risk elsewhere. The latter part of this statement is perhaps covered by the existing text so a short additional sentence requiring it be demonstrated that the risk of flooding has been reduced (by any measures or improved maintenance and operation activities) along with detailed proposals for how any residual risk would be managed is required. This could be in the form of a Flood Risk Assessment which draws on any improved modelling or understanding that comes out of the Local Flood Risk Management Plan actions.	We note SEPA's recommended wording and wish to work with SEPA on redrafted wording for these allocations.	
60.	00062	SEPA		17.2.4 In 2009/2010, some work was undertaken by Orkney Islands Council to estimate the expected flood level for a 1 in 200 year flood from the combined fluvial/surface water sources. The estimated flood level is 2.6 metres Above Ordnance Datum (AOD)	This is noted.	

				and this was based on observations of past flooding and rainfall data. This is the estimated level we are currently basing our advice upon. Some work may have already been undertaken by the Council and/or Scottish Water to improve surface water management in Kirkwall, but no detailed information is available and no reassessment of expected flood levels has so far been undertaken. We understand that the first phase of the Local Flood Risk Management Plan actions will be to fully model these combined sources of flooding and update understanding of the flood mechanisms and expected flood extents and levels.		
61.	00062	SEPA		17.2.5 More detailed comments are provided below for the individual sites: - K-23 Former Bus Station, Great Western Road From the information we hold, existing ground levels across the site appear to be between 2.3 and 2.7m AOD. Parts of the site therefore are above the flood level, but the site is surrounded by land which is lower and so access/egress may be difficult during flooding. Expected flood depths at the site based on our current understanding would be up to 0.3m. Once more detailed information is available from the surface water management plan work, there is likely to be potential to develop part of this site for more vulnerable uses and it may be possible to manage flood risk for other parts of the site.	SEPA's comments are noted and we wish to further work with SEPA to reflect this situation in the revised version of this Supplementary Guidance.	
62.	00062	SEPA		- K-24 Former Jewson's Site From the information we hold, existing ground levels across this site are between 2.0 and 2.3m AOD. The whole site is at risk of flooding with flood depths between 0.3m and 0.6m expected. The site is surrounded on all sides by roads which are between 1.8 and 2.1m AOD and so to access or leave the site during flooding, flood depths of between 0.5m and 0.8m would have to be navigated, based on the information currently available. As this site is located in the highest risk part of the town, it may be difficult to reduce flood risk sufficiently to bring it within a range which is manageable. The uncertainty for future development is therefore much higher. On that basis, we are of the view that this site would be better promoted for less vulnerable uses, where the risk to human health from flood impacts is less.	SEPA's comments are noted and we wish to further work with SEPA to reflect this situation in the revised version of this Supplementary Guidance.	
63.	00062	SEPA		17.2.6 In summary, for both sites, we object unless the following text or similar is included within the individual settlement statement "A Flood Risk Assessment will be required to demonstrate the site is not at risk of flooding from surface water (to include fluvial flooding from small watercourses) or the risk can be managed without increasing risk elsewhere".	SEPA's objection to the wording in the draft Supplementary Guidance is noted. The Council wish to amend wording for these sites noted and in the introduction for Kirkwall to reflect the present flooding situation.	
64.	00062	SEPA		17.3 There are also a number of sites in the SG where we have made recommendations to add or amend the wording, for example against the settlement summary text Flooding/Water Drainage section or individual allocation supporting text. 17.3.1 These include a number of sites where we previously highlighted that there was the potential for peat and or wetlands on	We note SEPA's recommendations in regard to specific reference for allocated sites to carbon rich soils, peat or wetlands. From our local on the ground knowledge of the majority of the allocated sites noted in your comment peat, carbon rich soils and or wetland are not evident. We wish the Settlement Statements to concentrate on the main development / planning considerations. It should be noted that a successful development proposals on an allocated	

				<p>site. We welcome that for some of these this has been identified within the SEA ER. However we would welcome specific reference to this and the potential requirement for example a peat assessment and management plan within the individual allocation text. This amendment would ensure compliance with paragraph 205 of Scottish Planning Policy which states "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO 2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO 2 to the atmosphere. Developments should aim to minimise this release." However, if this recommendation is not taken forward we accept, as detailed in the ER that "Any development proposal in this area should fulfil the requirements of Policy 9 Natural Heritage and Landscape."</p>	<p>site will have to accord with the policies of the emerging Plan that includes Policy 9 - Natural Environment, Part D - Water Environment and Part E - Peat and Soils.</p>	
65.	00062	SEPA		<p>17.3.2 Please refer to the column entitled SEPA advice/comments in Table 1 below for further information. The sites where we have made recommendations/have comments, other than support or no comments, are highlighted in yellow but for the avoidance of doubt these should not be considered as objections. To assist you we have also made comments in this column relating to example any typographical errors.</p>	<p>Noted.</p>	
66.	00062	SEPA		<p>Burnside (BH-1, BH-2, BH-3, BH-4) Support wording. We also welcome the recognition in the ER that there may be peat within the settlement and "Any development proposal in this area should fulfil the requirements of Policy 9 Natural Heritage and Landscape." We previously highlighted that there may be peat on site and would welcome reference to the management of this but accept that any development proposal in this area would address this through fulfilling the requirements of Policy 9 Natural Heritage and</p>	<p>Noted. Please refer to the Council's position as noted with SEPA comment 17.3.</p>	
67.	00062	SEPA		<p>Burray Village (BV-1 BV-2) We previously highlighted that there may be peat on site and would welcome reference to the management of this but accept that any development proposal in this area would address this through fulfilling the requirements of Policy 9 Natural Heritage and</p>	<p>Noted. Please refer to the Council's position as noted with SEPA comment 17.3.</p>	
68.	00062	SEPA			<p>Noted.</p>	
69.	00062			<p>Dounby (DY-7) - At the MIR stage we referenced surface water flood risk. We would welcome reference to this but as it only impacts a small corner of the site DY-7 have no objection to the fact it isn't referenced.</p>	<p>Noted. In regard to surface water drainage, a development proposal will have to accord with Policy 13 - Flood Risk, SuDS Waste Water</p>	
70.	00062	SEPA		<p>Evie Village - Support wording.</p>	<p>Noted.</p>	
71.	00062	SEPA		<p>Finstown (F-1) - We would welcome the addition of the following wording or similar in regard to the burn on site F1 - "there may be a requirement for an appropriate development free buffer around it."</p>	<p>Noted, this additional information will be added to a revised version of this Supplementary Guidance.</p>	

72.	00062	SEPA		Herston - Highlight typo "062 Public sewerage is not available.." two full stops.	Noted and this typo will be amended. ACTION	
73.	00062	SEPA		Hillhead - Support wording.	Noted.	
74.	00062	SEPA		Houton Pier - Support wording.	Noted.	
75.	00062	SEPA		Kirkwall - We welcome the clarification of flooding from small watercourses. Re. Site K-9 - Should reference be to western or south western boundary of the site rather than southern? Re. Site K-1 - We highlight that the public sewer does not extend this far so investigation of connection would be required within the development brief. Re. Site K-22 - Further to our previous flood risk advice we would welcome wording to promote betterment.	K-9 - Noted and the correct direction will be included in the revised version. K-1 - Noted and will be taken forward in the revised version. K-22 - Surface water drainage / flooding is covered in Policy 13 of the Proposed Plan.	
76.	00062	SEPA		Lighthouse Corner - Support wording.	Noted.	
77.	00062	SEPA		Linnadale- Support wording.	Noted.	
78.	00062	SEPA		Lyron - Support wording.	Noted.	
79.	00062	SEPA		Madras (M-1, M-2, M-3, M-4, M-5, M-6) - We previously highlighted that there may be peat on site and would welcome reference to the management of this but accept that any development proposal in this area would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	Noted. Please refer to the Council's position as noted with SEPA's comment 17.3.	
80.	00062	SEPA		Norseman - We welcome the recognition in the ER that Sites 1 and 2 are adjacent to bog habitat so care will be needed to ensure to impact on the bog or any GWDTEs within the bog habitat. We would welcome reference to the management of this but accept that any development proposal in this area would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape	Noted. Please refer to the Council's position as noted with SEPA's comment 17.3.	
81.	00062	SEPA		Orphir- Support wording.	Noted.	
82.	00062	SEPA		Quoyloo- Support wording.	Noted.	
83.	00062	SEPA		Scapa Brae - Support wording.	Noted.	

84.	00062	SEPA		St Margaret's Hope - Support wording.	Noted.	
85.	00062	SEPA		St Mary's - Support wording.	Noted.	
86.	00062	SEPA		Stenness - Support wording.	Noted.	
87.	00062	SEPA		Stromness - Welcome reference to wetlands at STR-19.	Noted.	
88.	00062	SEPA		The Palace - Support wording.	Noted.	
89.	00062	SEPA		Tingwall - Considering our previous advice we would welcome reference to a buffer may be required at the sea ward side of the site TW-2.	Reference for this site has been made to the potential of wave action and that further information would be required to support a development proposal.	
90.	00062	SEPA		Toab - Support wording.	Noted.	
91.	00062	SEPA		Eday - Higher ground on the island is bog or heather so GWDTEs likely. Peat rich or peat containing soils cover most of the island in higher areas, especially in the Southern half of island. Some areas of Deep peat are mapped by SNH as Priority peatland habitats. Therefore Peat and GWDTEs will be an issue for a lot of development on the island, especially the Southern half. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
92.	00062	SEPA		Eday Hamar - Peat bog and peat within 500m but no peat mapped in proposed area. Known Wet heath and Peat bog within 200m to the West but looks to be associated with the Mill loch. Therefore no issues expected but surveys may be required. As such we would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
93.	00062	SEPA		Egilsay - A large percentage of the island is KNOWN wetland (mostly marshy grassland with swamps and wet machair). A lot of the island is therefore within 250m of GWDTE and any development will require surveys. Soil is categorised as "organo-mineral no peat" so peat not an issue here. As such we would welcome reference to GWDTE in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
94.	00062	SEPA		Flotta - The higher ground to the West and the land to the NE of the terminal is either bog, heather or rough grassland so highly likely to be GWDTE issues for development. Both these areas are on deep	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The	

				peat . As such we would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
95.	00062	SEPA		Graemsay - Areas of Rough grassland with some Heather which may contain GWDTE habitats but unlikely to be a significant problem to development. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
96.	00062	SEPA		Hoy - Majority of the island is SAC/SSSI with qualifying features which are GWDTE habitats. Majority of island is Peat or Peat containing soils which are mapped by SNH as Priority peatland habitats. We would strongly recommend reference is made to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
97.	00062	SEPA		North Ronaldsay - Some areas of fen, marsh and swamp associated with small lochans which should be avoided. Areas of rough grassland which may contain other GWDTE. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
98.	00062	SEPA		Papa Westray - North tip of the island has known wetlands. No GWDTE issues on rest of island. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
99.	00062	SEPA		Rousay - Large proportion of island is known wetlands (wet heath, bog, flushes and marshy grassland) therefore GWDTE have potential to be significant issue. The higher ground on the middle of the island is peat rich soils and most of the wetlands are associated with these areas. The Peat rich soils are mapped by SNH as Priority Peatland Habitats. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	

100	00062	SEPA		Rousay - Brinyan Soil mapped as "organo-mineral with occasional peat" so some peat likely. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
101	00062	SEPA		Sanday - Small areas of Saltmarsh, fen, marshes and swamps present but majority of island agricultural land. Only potential peat in the very Southern tip on West of road to Spur Ness. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
102	00062	SEPA		Shapinsay - Area of swamp, marshy grassland and flushes at Mill Dam Nature Reserve which will be given some protection indirectly from the designation but are not a designated feature in themselves. Soil mapped as Organo-mineral, no peat except small area in South East which may have occasional peat but unlikely to be an issue. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	
103	00062	SEPA		Shapinsay - Balfour Village Support wording.	Noted	
104	00062	SEPA		Stronsay - Area of swamp, marshy grassland and flushes at Mill Dam Nature Reserve which will be given some protection indirectly from the designation but are not a designated feature in themselves. Soil mapped as Organo-mineral, no peat except small area in South East which may have occasional peat but unlikely to be an issue. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape. Stronsay - Whitehall Village Support wording. Minor point - highlight typo "289 Limited public	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands. We note the typo and will edit as required.	
105	00062	SEPA		Westray - Known wetlands in West Westray SSSI/SPA which will be given some protection indirectly from the designation but are not a designated feature in themselves. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.	The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.	

106	00062	SEPA		<p>Westray - Pierowall Village For information only - There is a limited system of public sewers available in Pierowall consisting of septic tanks then discharging to the sea. These may be at capacity.</p>	Noted.	
107	00062	SEPA		<p>Wyre - Some areas of Fen, Marsh, Swamp in the East and some rough grassland so GWDTE possible. We would welcome reference to this in the rural settlement statement but accept that any development proposal would address this through fulfilling the requirements of Policy 9 Natural Heritage and Landscape.</p>	<p>The Isles Statements are small statements that concentrate on the existing public facilities and notes historic environment assets, natural heritage designations and other considerations. The Council considers noting wetland areas, area of peat and carbon rich soils as not appropriate. It should be noted that Policy 9 - Natural Heritage Landscape, Part D - The Water Environment and Part E - Peat and Soils, of the Proposed Plan will be relevant to any development proposal effecting carbon rich soils, peat and wetlands.</p>	
108	00529	Interested Person		<p>4. Since the sewerage pumping station was built we are often faced with unpleasant smells and increased noise levels. We have never complained to date as we felt that it was necessary to have it there to take the sewerage away from the ever increasing size of the town centre. Any housing development situated closer than we are in K-17 would surely find it very unpleasant indeed. In your development brief for Weyland Bay it states that the sewerage pumping station is recognized as an environmental /public health risk!</p> <p>Some of the points above were highlighted in your own development brief in October 2014 and stated that K-17 should be left as "open space", we cannot see anything that has changed significantly since that time to recommend re-zoning. We also believe that there is already enough land designated or proposed for housing in other more suitable areas around Kirkwall to meet housing demands in the next five to ten years.</p> <p>We have enclosed a selection of photos we have taken over the years to show the flooding on both Carness and Craigiefield Road. We hope you will consider the above points and not re-zone K-17 for development but leave it as "open space."</p> <p>Note this comment also includes photographs of the site and surroundings showing flooding events.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
109	00529	Interested Person		<p>Having read through your proposed Development Plan we would like to comment/object to your proposals for K-17. Having stayed in the Craigiefield area for over 20yrs we feel that re-zoning K-17 for housing is not a good idea for many reasons, some of which are listed below:</p> <ol style="list-style-type: none"> 1. The area is highlighted as a med/high risk area for surface water flooding per SEPA's own flood maps. We witness every winter, days when the lower coast road cannot be accessed due to over topping and debris on the road. The other option for us to get in to town is via Craigiefield Rd, it can also have a quantity of surface water on it when the ditches either side cannot hold the quantity of water coming down them! 2. Craigiefield Rd is a single track road with passing places. We have noticed an increase in traffic and pedestrians over the last few months since the new dev near Orkney College was 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

				<p>When out walking you are constantly stopping to allow vehicles to pass. The verge either side is very narrow, so much so that at least 3 vehicles have ended up in the ditch over the last 12mths when trying to pull over for either other vehicles or peds. When the dev at K-16 is complete, and if K-17 goes ahead this will add to the amount of traffic on this road which is really at its capacity now.</p> <p>3. Craigiefield at the moment is semi-rural, if K-17 were to be dev the town boundary would move outward and there are tourism businesses in the area that may be affected as they sell their accommodation on the basis of their location.</p>		
110	00530	Interested Person		<p>Environmental Health -There are concerns with the sewage pumping station - there are unpleasant smells emitted from the building and the extractor unit noise can be excessive. The proposed development would surround the station closely and be significantly affected.</p> <p>As short ago as 18 month, the councils Weyland bay Development Breif stated . The site is highlighted as high coastal flood risk . Development to the east of the Pumping Station is not supported, so what in this short time has changed.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
111	00530	Interested Person		<p>We feel that there has been inadequate consultation and notice given with regards to the rezoning from open space recreational land to the proposed building land and if the council felt the area was not accessable, a plan should have been made to address this. Such as development of the area into some sort of parklands with tree planting and suitable walking / cycling paths and some form of natural play areas for children, with the help from the Carness community.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
112	00530	Interested Person		<p>We are writing with regard to the Proposed OIC Development Plan. Specifiially K-17 the Camess / Weyland Bay Area.</p> <p>Our concerns are as follows, Open Space - The council stated that "This area was previously classified as open space but has been declassified as it is not publicly accessible". We beleive that it is very much accessed by the many many walkers, runners and cyclists that use the Craigiefield circuit evert day. The open fields, wild flowers, birds and livestock in the fields are enjoyed by all. The very nature of the walk being so close to Kirkwall but in open land is what makes this such a desirable asset to Kirkwall and its residents. Just because the users are not walking on the grass and accross the land does not mean that the space is not being accessed and enjoyed. We feel to lose this is unacceptable.</p> <p>In addition, if the council felt that this open space was not publicly accessible then surely an attempt should be made to rectify this, making it more publicly accessible rather than a move straight to developing the area for housing.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

113	00530	Interested Person		<p>Flooding and drainage in the area- both Carness Road and Craigiefield Road are highly susceptible to flooding every winter which is exacerbated by high tides and further compounded by overtopping.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
114	00530	Interested Person		<p>Road Safety - It would seem that the current road infrastructure is not sufficient to cope with the extra volume from the proposed development. Craigiefield Road is a single track road with passing places and deep ditches. This road would become the main access route at times when the lower road is flooded, which occurs every winter. Within the last year, we can recall five vehicles including commercial plant ending up in the ditch requiring rescue and just last month a lorry from Carness fish farm spilling its load of rotting fish, closing the road for five hours it would seem safe to assume that similar incidents would become more frequent with the higher traffic density. There are also concerns for the tight corner at the Coastguard Station, and whether increased traffic and pedestrian volume would adversely affect safety in this area.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
115	00531	Interested Person		<p>Past planning policy and decisions made have allowed the present situation to develop in Dalespot. It is in effect very developed for a rural area. To add further development (possibly 8 or 10 houses) in such a small area would produce an urban unit within a rural area and would have little in common with the countryside around it. This would very much alter what this part of Orkney is and would add to the burdens already placed on those who farm this area. These urban units in the countryside seem to be on the increase eg my late uncle's farm, Wilderness, Holm, where the farm buildings have been demolished and a number of two story houses are being built. These have no relation to the surrounding countryside and environment and are causing a lot of negative comment.</p> <p>The extent of the development at Dalespot also gives rise to the question of drainage on what is heavy land. I have spoken with someone who knows this land far better than anyone else. He is of the opinion that the land is unsuitable for housing due to the drainage issues and the prospect of further housing came as a surprise. The drainage of the site will be influenced by the large ditch on the east side of the area. Is this ditch part of any proposed development where its upkeep and costs are covered by the urban unit or will it be at the discretion of another landowner This area is the source or one of the sources of Wideford Burn.</p> <p>The potential for business and employment and its bus and broadband links are covered in the documents. A detailed examination of the situation at present may reveal that the prospects of business and employment are not very different from other areas. The mix of housing and business is often a source of conflict as is the rise of non-farming households and farms. Then there is the problem of conflict between non-farming households that can outflow and involve the farmer and his or her farm.</p>	<p>This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.</p>	
116	00531	Interested Person		<p>The extent of the development at Dalespot also gives rise to the question of drainage on what is heavy land. I have spoken with someone who knows this land far better than anyone else. He is of</p>	<p>This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 -</p>	

				the opinion that the land is unsuitable for housing due to the drainage issues and the prospect of further housing came as a surprise. The drainage of the site will be influenced by the large ditch on the east side of the area. Is this ditch part of any proposed development where its upkeep and costs are covered by the urban unit or will it be at the discretion of another landowner This area is the source or one of the sources of Wideford Burn.	Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
117	00531	Interested Person		The potential for business and employment and its bus and broadband links are covered in the documents. A detailed examination of the situation at present may reveal that the prospects of business and employment are not very different from other areas. The mix of housing and business is often a source of conflict as is the rise of non-farming households and farms. Then there is the problem of conflict between non-farming households that can outflow and involve the farmer and his or her farm.	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
118	00531	Interested Person		<p>It may be that electrical and water supply are not planning issues but they are of importance to those in this area. Landowners are presented with proposals for extra power supply structures and its installation when such intrusion and consequences are not desired. The water supply to this farm has always been poor and one has had to work round it as best as one can. To add further demand may negatively affect the supply and in time be costly to resolve. Another issue is that of neighbour notification where landowners are not notified about development and usually have to</p> <p>a) buy the Orcadian and b) read it to find out what is being proposed next to their land eg even when the house wall is next to land belonging to the farm. I am sure I would not be allowed to communicate with the planning department in such a manner. Problems are best sorted as early as possible when hopefully they can be resolved, rather than later in the process when lasting enmity can develop.</p> <p>Of particular concern with the proposed inclusion of Dalespot in the plan and the extent of the development is that of access to the Holm Road. Over the years the amount of traffic and the size of the vehicles has increased as has the speed (often excessive) they travel. The road is undulating and the vehicles are often not visible in the dips. Users of the farm road are presented with this situation on a daily basis especially those with farm vehicles and machinery. Turning onto the farm road can be difficult as following traffic can try and overtake when farm vehicles are trying to turn in. Various incidents have occurred over the years and a recent example from 2015 is where a van was written off and the tractor badly damaged. By good fortune no-one was hurt. On 2nd June 2016 three stationary vehicles were noticed at the side of the road at Glendale Park and the proposed area for inclusion in the plan. There was debris in the road so some sort of collision had occurred. Another possible incident, furthà5F</p>	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
119	00531	Interested Person		<p>Another issue is that of neighbour notification where landowners are not notified about development and usually have to</p> <p>a) buy the Orcadian and b) read it to find out what is being proposed next to their land eg even when the house wall is next to land belonging to the farm. I am sure I would not be allowed to communicate with the planning</p>	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement	

				department in such a manner. Problems are best sorted as early as possible when hopefully they can be resolved, rather than later in the process when lasting enmity can develop.	remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
120	00531	Interested Person		<p>Of particular concern with the proposed inclusion of Dalespot in the plan and the extent of the development is that of access to the Holm Road. Over the years the amount of traffic and the size of the vehicles has increased as has the speed (often excessive) they travel. The road is undulating and the vehicles are often not visible in the dips. Users of the farm road are presented with this situation on a daily basis especially those with farm vehicles and machinery. Turning onto the farm road can be difficult as following traffic can try and overtake when farm vehicles are trying to turn in. Various incidents have occurred over the years and a recent example from 2015 is where a van was written off and the tractor badly damaged. By good fortune no-one was hurt. On 2nd June 2016 three stationary vehicles were noticed at the side of the road at Glendale Park and the proposed area for inclusion in the plan. There was debris in the road so some sort of collision had occurred. Another possible incident, further along the road, occurred on 7th June 2016 when four cars and a police vehicle were seen parked on the road.</p>	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
121	00531	Interested Person		<p>I am concerned that the increased traffic movements from further development at Dalespot can only add to the existing problems experienced by other road users. From the Orkney Local Development Plan Gray (PIIP710) p. 123-124 I note that "and when we spoke to the Roads Department another access out onto the main road would be no problem anyway". It is my understanding from talks with the Roads Department that access onto this type of road is not usually recommended. Perhaps these conflicting responses need to be addressed by the planning department and roads department.</p> <p>Any new access would probably be between Glendale Park and the applicant's own house. This would be very close to the access road from this farm and could further complicate the movement of vehicles to and from this farm. It would also increase the problems for all road users. The existing access at Dalespot is not the easiest to use and to increase the amount of traffic using it can only increase the risks to other road users.</p> <p>If the area at Dalespot is included in the plan and further housing is allowed then it would seem inevitable that the speed limit in the area would need to be reduced to 40mph, as it has been on a number of other roads where housing is clustered and as the Councillors voted for at Hatston Park.</p> <p>The users of the farm road have for several years had to try and safely negotiate the junction of the farm road with the Holm Road, where a view of the Holm Road has been hidden by the neighbours' hedge. It is very disappointing to now be facing the possibility of further road problems from an urban development across the road. I feel that the burdens already in place in this part of rural Orkney are significant, and to add further development at Dalespot can only have a very negative impact.</p>	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
122	00531	Interested Person		Any new access would probably be between Glendale Park and the applicant's own house. This would be very close to the access road	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination	

				from this farm and could further complicate the movement of vehicles to and from this farm. It would also increase the problems for all road users. The existing access at Dalespot is not the easiest to use and to increase the amount of traffic using it can only increase the risks to other road users.	process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
123	00531	Interested Person		If the area at Dalespot is included in the plan and further housing is allowed then it would seem inevitable that the speed limit in the area would need to be reduced to 40mph, as it has been on a number of other roads where housing is clustered and as the Councillors voted for at Hatston Park.	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
124	00531	Interested Person		The users of the farm road have for several years had to try and safely negotiate the junction of the farm road with the Holm Road, where a view of the Holm Road has been hidden by the neighbours' hedge. It is very disappointing to now be facing the possibility of further road problems from an urban development across the road. I feel that the burdens already in place in this part of rural Orkney are significant, and to add further development at Dalespot can only have a very negative impact.	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 28 - Dalespot (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
125	00532	Interested Person		I would like to comment on the draft Orkney Local Plan which is very comprehensive and well presented. My only comment pertains to the housing plan for the Tingwall area. It is difficult to make out from the accompanying map which specific areas are deemed suitable for housing. The area around Midgarth is already very developed with a number of houses and I would object to any more being sited in this area. Congratulations on a well done plan for Orkney.	This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 30 - Tingwall. The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.	
126	00533	Interested Person		We have recently purchased the bed and breakfast Ardconnel Cragiefield Road with the understanding it would remain a rural area. We feel the development of zone 17 would be detrimental to our business. The majority of guests are booking with us as we are out of town in a quiet picturesque area We did not realise the amount of people who walk with and without dogs round Cragiefield due to the scenic views and lack of traffic. With the extra traffic and no pavements there is an increased risk to public safety. We feel this development if it goes ahead could potentially add 100 to 150 cars using Cragiefield Road. With overtopping in the bad weather traffic would be forced to use the Cragiefield Road which is not suitable due to it being single lane. The road is bad enough at the moment and with increased traffic there would be a significant increase in road safety issues. The bottom of the road at Cragiefield often floods, there has been several accidents recently with the most recent being the Salmon lorry spilling rotten fish/morts at the junction at Cragiefield House resulting in the road being closed all evening. As outlined in a development brief for Weyland Bay (OIC October 2014) site K17 should remain designated as open space and not suitable for housing. Can the planning department explain why this has now changed?	This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.	

127	00534	Interested Person		On the Stromness Development Plan STR 19 is owned by my family, and my family wish to develop it short term. We would be open to discussion on how the land is developed with the Planning Dept.	This proposed modification to change this housing allocation from long term to a short term allocation on the Plan's Proposal Maps has been taken forward in the examination process with the Scottish Government through Issue 26 - Stromness (STR-19). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this allocation remains in the Proposal Maps as a long term allocation. The findings of the Examination Report are binding.	
128	00535	Interested Person		I strongly object to this proposed plan , my reasons are we have recently moved to craigiefield and consider it as being in the country. The walkway(road) for walkers and dog walkers and cyclists would be considerably busier , the road would have to be widened and a foot/cycle path added .The Weyland and Carness road would need to be upgraded and is also a flood risk , there is coastal erosion there already on what used to be a fly tipping area. Do the OIC intend relocating the water,sewerage pumping station , I cant imagine anyone wanting to live anywhere near that eyesore andsmell. Once again I strongly disagree with OIC on this new development, i look forward to your reply by email for confirmation you have recieved it and by letter.	This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.	
129	00536			I write in connection about the main issues report as referred to Site 21 for Kirkwall, at the moment our area of land is not in the proposed plan as development land. I believe that the area in question should be included in the development plan and would be well suited to sympathetic and well planned expansion. It makes provision for travel by sustainable means. The sites would be easily accessible by foot, by bicycle and car, also this would provide a short distance for children to walk safely to school. The sites would be well proportioned in fitting with the landscape. I would be most grateful if you would give this your consideration to include this land in the development plan for Kirkwall.	This proposed modification to add a housing allocation to the Kirkwall settlement boundary has been taken forward in the examination process with the Scottish Government through Issue 16 - Kirkwall (Inganess Cott). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as an allocation. The findings of the Examination Report are binding.	
130	00537	Interested Person		Thank-you for the opportunity to respond to the proposals in the Orkney Local Development Plan. Generally, the quality of the document is very good, and a significant amount of work sits behind the draft plan. My specific comments relate to site K17 and the proposed re-zoning from open space to housing. In arriving at my view and comments, I have studied various other OIC/SG documents which I will refer to. 1. Site K17 is defined as "open space" in the Weyland Bay development brief (OIC, October 2014) and is extensively used and enjoyed by people. There is significant local importance to the community of this open space. It should be retained and enhances as open space or the settlement boundary re-aligned to remove this site. The Weyland Bay development brief relates to the immediately adjacent site K16 which is a higher site and immediately borders the urban edge of Kirkwall. The brief was approved as recently as October 2014. In the document it states: "The site is highlighted as high coastal flood risk" "Development will also have to ensure that a suitable level of residential amenity can be achieved in relation to the existing	This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.	

				<p>Sewage Pumping station” “Development to the east of the Pumping station is not supported...” (site K17 is to the east) My view is that nothing has changed since October 2014 and that site K17 should be retained as open space.</p>		
131	00537	Interested Person		<p>2. In line with Scottish Planning policy on Open space (SPP11), this area is very much used and appreciated as open space by local residents, walkers, cyclists and horseriders who travel to the area to enjoy the space.</p> <ul style="list-style-type: none"> - This area is zoned as open space. It serves a wide community area. - In the Strategic Environmental Assessment (appx3 – Assessment of the Kirkwall land allocations, page 106) It is stated that “This area was previously classified as open space but has been declassified as it is not publicly accessible”. - I firmly disagree with this statement and believe that it is very much visibly and aesthetically accessible for the large number of people who walk and enjoy the local area, commonly known as the “craigiefield circuit”. - If this view is not shared by authors of the plan, I and members of the community would be very willing to engage in discussion as to how best to make the designated open space more accessible. I believe that it is important to attempt to make open space more accessible prior to simply developing it. - The Orkney Open Space Strategy (Policy D6) states “Development that would result in a loss of existing open space will not generally be permitted”. “Development which will improve or add to the current levels of open space will be supported.” 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
132	00537	Interested Person		<p>3. Road infrastructure and Road safety in the Craigiefield area. The Carness Road is often susceptible to flooding/storm closures in Winter. The only feasible alternative is access and use of the single-track Craigiefield Road. This road is already busy and simply could not cope with additional traffic (100 houses – 200cars??). Further, Craigiefield Road also floods in Winter. By developing the site K17, visibility of drivers around the Craigiefield/Carness corner will be much reduced and increase likelihood of accidents for both vehicles and pedestrians/cyclists. The Coastguard-station corner is a particularly dangerous and tight corner and with potentially 100-200 extra commuting vehicles per day this presents a huge road safety issue for drivers and pedestrians. Significant work has been done on ditches recently resulting in little or no verges remaining, and creating a safety hazard with walkers falling into ditches.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
133	00537	Interested Person		<p>4. Transport links to town and schools. - In the Strategic Environmental Assessment (appx3 – Assessment of the Kirkwall land allocations, page 100) - It is stated that the site is 15-20 minutes walk to Papdale primary. This may be for an able adult power-walking on their own. With my 5-year old, this takes 35 minutes from the entrance to Craigiefield Park to walk the 1.5 miles each way – and is well outwith the 15 minutes referred to as a limit in</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

				<p>the Weyland Bay development brief.</p> <ul style="list-style-type: none"> - Site K17 simply is not within reasonable walking distance for primary school children and should be re-scored on that basis. 		
134	00537	Interested Person		<p>5. Environmental health concerns regarding the sewage pumping station.</p> <ul style="list-style-type: none"> - The sewage pumping station (between sites K16 and K17) is recognised as an environmental/public health risk in the Weyland Bay development brief. "development will have to ensure that a suitable level of residential amenity can be achieved in relation to the existing sewage pumping station. This may require a setting back of development from this infrastructure." - This building emits noise and odours which are unpleasant to existing residents from a distance up to 250m. I do not feel it would be desirable for anyone to live in any closer vicinity to the sewage pumping station. 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
135	00537	Interested Person		<p>6. Flooding/ drainage. (photos submitted)</p> <ul style="list-style-type: none"> - Both Carness Road and Craigiefield Road are highly susceptible to winter flooding. - This is particularly acute during high tides and storms in winter when wave overtopping can further compound flood waters. This leads to closures of all access roads to site K17 and beyond. - At high tide there is simply nowhere for the water to drain to as the land is low-lying and wet. (photo of junction submitted). 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
136	00537	Interested Person		<p>7. Strategic/ spatial planning of the Kirkwall area and outlying communities.</p> <ul style="list-style-type: none"> - Site K-17 exists as a natural "green belt" between the urban development of Kirkwall and the distinct semi-rural, lower density development of the Craigiefield community. - In my view, there are significant planning benefits in embracing and enhancing the green belt. I and the local community would welcome discussing how this can be achieved. 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
137	00537	Interested Person		<p>8. Better alternative uses for K17 exist.</p> <ul style="list-style-type: none"> - The draft plan proposes a significant and material change to community open-space. The local community would welcome discussions on maximising the enjoyment of this asset, perhaps to include ways to address the deficit of play areas in this zone. 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
138	00537	Interested Person		<p>9. There is no need for K17 to be re-zoned</p> <ul style="list-style-type: none"> - The total allocation for housing allocated in the plan for the Kirkwall area (Appendix 3 – Notional densities for Housing Allocations) significantly outstrips the requirements for housing over the period of this plan and beyond. There would be no detriment to the ability to meet local housing needs by retaining K17 as open space, or removing from the development/ settlement boundary. 	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

139	00538	Interested Person		<p>I am writing to you today to express my concern regarding the proposed plan of development of Plot K-17. I have been a resident on Craigiefield Road for 25 years and have recently moved to Craigiefield Park. One of the reasons myself and my wife wanted to stay in the area is due to the views and quietness of the area. I am very concerned about this proposed development (K-17), particularly because in 2014, Orkney Islands Council decided that K-17 should remain as an open space and not be designated for housing. As far as I am aware, there is no reason for this development area to have changed and I feel strongly that it should remain as an open space for the following reasons:</p> <p>In 2014, as previously stated, Orkney Islands Council stated that K-17 should remain designated as an open space and not be designated for housing-I can see no reason for the change in this. Can Orkney Islands Council explain the significant changes in the past two years that have led to this decision being changed?</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
140	00538	Interested Person		<p>I believe that if this development were to go ahead this would significantly affect the picturesque, rural landscape, quiet community and desirable walking route which many people; including non-residents enjoy. I also believe that the high demand on the road would be a considerable safety risk as the area is desirable to walkers and runners. This area is often used by members of the public as a walking route and the high demand of traffic on the road, with no pavement would cause safety risks for many. I do not believe the road in this area could cope with the high demand of traffic the proposed development would bring.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
141	00538	Interested Person		<p>The K-17 site is susceptible to significant flooding. This road is regularly flooded in high tide and wet conditions. More hard surfacing in the area would increase the risks and impacts of flooding and I do not feel this is beneficial for residents or Orkney Islands Council.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
142	00538	Interested Person		<p>The sewage pumping station produces unpleasant odour and noise and this would not be appropriate to have a development close to this facility.</p> <p>I feel very strongly that this proposed development should not go ahead and I urge Orkney Islands Council to reconsider this development for the benefit of the public in Orkney and the local resident. I look forward to hearing from you on this matter.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
143	00540	Interested Person		<p>As a resident of xxxxxx, I will confine my comments to that part of the proposals that affect my immediate area, in particular the sites in Church Road itself.</p> <p>I, and a number of my neighbours, have concerns about the proposed developments for a number of reasons, including change of character, over-development, flood risk and safety.</p> <p>Harray comprises a small, spread-out, rural community, not even large enough to be a village. As can be seen, growth of Harray has taken place over the years mainly through single natural developments, houses being built individually (in recent years as well as longer term historically), rather than in pre-determined groups. This is part of the character of the area and one of the significant reasons why we choose to live in such a rural area.</p>	<p>This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 31 - Burnside (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.</p>	

				<p>Much of the appeal is in its views, its open space and little clutter. There is plenty of space for all to enjoy these benefits. Spreading out the siting of new houses further around Harray would retain that, without changing the character of the area.</p> <p>The current proposals for Church Road seem to ignore all those benefits and squeeze properties into a small number of plots as if this was a town or large village with little space and with little concern for the effects the imposition of the large number of properties would have on the current residents. There are already concerns about the latest two properties under construction in Church Road, how, as construction proceeds, they are starting to dominate the road and threaten privacy by overlooking existing properties. They seem to pay little respect to the natural lines of the Orkney landscape. The new proposals would put the new properties in the position of overlooking the existing and retention of privacy would be questionable. Site BH-2 particularly would introduce significant privacy issues with the proximity of the Old School House and Old Kirk. (continued)</p>		
144	00540	Interested Person		<p>(Continued) There is nowhere else in Harray where so many houses have been concentrated so closely and it seems unnecessary given the vast amount of little used land available. The main A986 road that passes through Harray carries most of the services making it little issue to provide those to properties close to that road, as can be seen, for example, at the recently-built house near the Stoneyhill Road junction at the southern end of Harray.</p>	<p>This proposed modification to remove this rural settlement from the Proposals Maps has been taken forward in the examination process with the Scottish Government through Issue 31 - Burnside (removal). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this rural settlement remains in the Proposal Maps of the emerging Plan. The findings of the Examination Report are binding.</p>	
145	00541			<p>I am emailing you with regards to the development plan for housing in the Craigiefield area. As a resident of Craigiefield Road I just wanted to let you know of the concerns I have for this. I regularly watch the field at the bottom of the road flood in winter. I also regularly walk in and out the road with my children, my youngest at two years old always holds his hand to his nose as we pass the pumping station and says poo, it is not a pleasant smell, the degree of the smell depends on the direction of the wind. Also as regular walkers we would be concerned about the extra traffic the housing would create on a single track road where there is no pavement.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
146	00542	Interested Person		<p>I send this email objecting to the building of houses on the K-17 site as I feel it is unsuitable site for building houses, the area is very prone to flooding, the cost of up-grading roads, a pumping station right in the middle of the two sites, I feel there are far better areas around Kirkwall that could be used for housing and this area should be left as an open space or turned into an environmental area which would be far more beneficial to all that stay in Kirkwall area.</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	
147	00543	Interested Person		<p>We wish to object to the Proposed OIC Development Plan Site K-17 and draw attention to previous OIC October 2014 brief stating that this area remain designated open space and not be designated for housing. The reasons why you have already decided and that sensible decision should remain. What is different now?? Perhaps those trying to re-raise the action should try pitching a few tents or installing a few Pickaquoy pods as a practice run and see</p>	<p>This proposed modification to remove a housing allocation from the Proposals Maps and from the Kirkwall Settlement Statement has been considered by the Scottish Government's appointed Reporter. The Examination Report has been published and it is recommended for this allocation to be removed and allocated as Open Space. The findings of the Examination Report are binding.</p>	

				how the occupiers enjoy flooding, stink of sewage and kelp on their doorstep plus the constant threat of getting run down at any time on the circuit that is called a road running around the rural Craigiefield area. The unkept ditches struggle to retain their purpose and the verges are not wide enough for people or pets out walking to be safe from traffic, or even traffic from other traffic and what now, more houses, more bodies, more concrete and less fields or land which already struggles to cope with existing conditions. We vote NO to this development.		
148	00196	Developer		St. Mary's - Sites STM-5 and STM-6 are currently owned by the Association. The description for site STM-6 states, "A new access road from the A961 would be required for sites STM-1, STM-4 and STM-6". We feel that site STM-6 can be adequately serviced using the existing access from both Graeme Park and Station Square without the need to provide another access. The provision of links between these sites can be provided as required but to require the construction of a new access road from the A961 through sites STM-1 and STM-4 before the development of STM-6 will be extremely restrictive and could prevent any development. We therefore request that this requirement be deleted for site STM-6.	Your comments are noted. Information in this SG on road access has come from Road Services at the Council. This provides a strong indication of requirements. The planning application process or the development brief process will go further here and could potentially provide material considerations for the consideration of alternative access arrangements.	
149	00196	Developer		Stromness - The Association currently owns site STR-2. When the site was purchased it was considered that no access off Hillside Road would be required or permitted. We would request that reference to a new access off Hillside Road be omitted.	Your comments on noted. The statement on new access provision has been drafted with input from Road Services at the Council. It states "likely" therefore alterative access arrangements could be considered through the development brief stage. This statement will be not be removed from the final draft.	
150	00196	Developer		Kirkwall - We note that on the map of Kirkwall that the grassed, presently undeveloped area at our Sutherland Park development is coloured green and designated as "Strategic Open Space". This has previously been designated as developable and within the settlement boundary. We have no immediate plans for development of this area, but some of it could be used for future development and we therefore request that it not be re-designated as proposed.	Removing this strategic open space allocation would be a modification to a proposal of the Proposed Plan. This matter has been considered through the examination of the Proposed Plan through Issue 23 - Kirkwall (Sutherland Park). The Scottish Government appointed Reporter has recommended no modifications in this case. The findings of the examination are binding.	
151	00061	Scottish Water		Kirkwall Site 1: Kirbister WTW and Kirkwall WWTW There is a foul sewer crossing this site. The developer should contact Scottish Water to ascertain whether a diversion is required.	This information is contained with the draft Supplementary Guidance: Settlement Statement for K-3.	
152	00061	Scottish Water		Lighthouse Corner Site 1: Kirbister WTW and Lynegar WWTW A 3" AC water main appears to run along the inside edge of the site where it borders the roads. The developer should contact SW as early as possible to discuss how this asset may impact on how this site is developed.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements under allocation LC-1.	
153	00061	Scottish Water		Lighthouse Corner Site 2: Kirbister WTW and Lynegar WWTW Lynegar WWTW is located approximately 250m (in a straight line) to the north west of this site. It may not be economically feasible to connect to the public sewer network.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements under allocation LC-2.	
154	00061			Lighthouse Corner Site 3: Kirbister WTW and Lynegar WWTW	Noted.	

155	00061	Scottish Water		Linnadale Site 1: Kirbister WTW and Petticoat Lane WWTW? Petticoat Lane ST is a small works which is located approximately 300m from this site. The developer should contact SW as early as possible to discuss whether a connection to the public sewer network is economically feasible.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements. Please note that this Rural Settlement will be going forward in the development planning process as Scorradale.	
156	00061	Scottish Water		Linnadale Site 2: Kirbister WTW and Petticoat Lane WWTW? Petticoat Lane ST is a small works which is located approximately 200m from this site. The developer should contact SW as early as possible to discuss whether a connection to the public sewer network is economically feasible.	This information is noted in the draft Supplementary Guidance: Settlement Statement. Please note that this Rural Settlement will be going forward in the development planning process as Scorradale.	
157	00061	Scottish Water		Linnadale Site 3: Kirbister WTW and Petticoat Lane WWTW? Petticoat Lane ST is a small works which is located approximately 150m from this site. The developer should contact SW as early as possible to discuss whether a connection to the public sewer network is economically feasible.	The correct distance of the works from this allocation will be noted in an updated version of Supplementary Guidance: Settlement Statement. Please note that this Rural Settlement will be known as Scorradale going forward in the development planning process.	
158	00061	Scottish Water		Burray Village: Limited public sewerage is available. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
159	00061	Scottish Water		Evie Village: Limited public sewerage is available. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
160	00061	Scottish Water		Hillhead: There is limited capacity to connect to public sewerage. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
161	00061	Scottish Water		Orphir Village: Limited public sewerage is available. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
162	00061	Scottish Water		Quoyloo: Limited public sewerage is available. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
163	00061	Scottish Water		Toab: Limited public sewerage is available. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
164	00061	Scottish Water		Shapinsay: Limited public sewerage is available in Balfour Village. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
165	00061	Scottish Water		Stronsay: Limited public sewerage is available in Whitehall; the social housing located closed to the pier has a waste water treatment works. Early discussions are recommended with Scottish Water to discuss build out rates and establish growth requirements.	This information will be noted in an updated version of Supplementary Guidance: Settlement Statements.	
166	00061	Scottish Water		Have attached an excel file detailing a few minor change requests to the information contained within the proposed LDP [information from this spreadsheet included in following comments]. These changes	This information will be added to the introduction section of the updated version of Supplementary Guidance: Settlement Statements with reference to Scottish Water's 5 growth criteria and	

				<p>are mainly in relation to settlements where there is currently 'limited capacity'. In these instances, Scottish Water would prefer that reference be made to our 5 growth criteria, allowing developers to be aware of the requirements needed in order to allow development to proceed.</p> <p>Our Pre Development Enquiry form allows Developers to engage with Scottish Water very early in the development process. This helps identify any infrastructure network upgrades / growth that is required and helps plan achievable build out rates with the Developer. We recommend the Developer to submit a Pre Development Enquiry (PDE) Form which can be found on our website (www.Scottishwater.Co.Uk) and is free to submit to our Customer Connections Team. Some sites may already contain Scottish Water infrastructure, for sites like these, it is necessary for Scottish Water to be consulted prior to any ground works being considered. Scottish Water reserves the right to gain 24 hour access to these assets should this be required and further contact should be made to discuss appropriate stand-off distances between the infrastructure and any building works, to both protect the assets and the services to existing customers. Those developers whose sites contain infrastructure should contact the Asset Impact Team using: service.Relocation@scottishwater.Co.Uk as early as possible so that these can be investigated further.</p>	early engagement through Scottish Water's enquiry form.	
167	00047	Historic Environment Scotland		<p>Comments on the Spatial Strategy and Supplementary Guidance: Settlement Statements:</p> <p>We have looked at the development proposals within the Plan, concentrating on our historic environment interests. Some of the proposed development sites have the potential for impacts on heritage assets within our remit. However, we consider that in the majority of cases, robust application of national and appropriate local policies should be able to mitigate any adverse impacts. Early engagement with Historic Environment Scotland on development proposals which raise complex or significant issues will be key to avoiding adverse impacts and optimising positive outcomes for the historic environment. We would encourage you to ensure that all mitigation measures identified in the Settlement Statements and ER are brought through to the site delivery requirements. We welcome that our comments from the MIR consultation have been taken into account in the Proposed Plan and that Dounby 8 (MIR reference) has been removed from the allocations.</p>	Your comments are noted.	
168	00337	Interested Group (RSPB)		<p>RSPB Scotland welcomes the inclusion of a section on natural heritage within the settlement statements. As noted in the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan (2016), a draft suite of marine Special Protection Areas (dSPAs) has been developed for consideration by the Scottish Government. Following a 2 day workshop (8-9 March 2016) with stakeholders, new indicative site boundaries were prepared for the draft SPAs (www.Gov.Scot/Resource/0050/00500818.Pdf). It is understood that SNH and JNCC will submit their revised formal advice on draft SPAs to Scottish Gov by end of June 16. Formal consultation on the Proposed SPAs is anticipated in 2016. Proposed SPAs taken forward for public consultation will have policy protection from that</p>	<p>RSPB Scotland comment here is noted. These draft designations will go forward in Supplementary Guidance: Natural Environment. The Council wishes the Proposed Plan and associated Supplementary Guidance to be concise and avoid duplication. This is in line with national planning guidance.</p>	

				point (in accordance with Paragraph 210 of SPP). RSPB Scotland therefore seeks the addition of reference to the North Orkney and Pentland Firth (currently draft) SPAs (and confirmation of their status at the time of publication of the SG) in the 'Natural Heritage' section of the following settlement statements: North Orkney (d)SPA – Kirkwall, Shapinsay, Wyre, Rousay, Egilsay and Pentland Firth (d)SPA - Hoy and South Walls, Flotta.		
169	00337	Interested Group (RSPB)		We support the identification of nearby local nature conservation sites (LNCS) within the natural heritage sections of the settlement statements but consider clarity would be provided by showing the boundaries of these sites on the maps. We also seek the addition of information on the Local Nature Conservation Sites that are nearby/adjacent to housing allocations within the table. We note that not all LNCS that are adjacent to settlements have been identified within the statements, for example: Linnadale: Housing allocations LD2 and LD3 are directly adjacent to the Orphir Hills Southern Fringes LNCS and Norsemen: Housing allocation N3 is directly adjacent to Rendall Moss LNCS. We therefore recommend that references to these are added to the relevant settlement statements.	Your comment is noted in regard to LNCS (names and maps). This information is contained within annex 1 to Supplementary Guidance: Natural Environment. The Council wishes the Proposed Plan and associated Supplementary Guidance to be concise and avoid duplication. This is in line with national planning guidance.	
170	00515	Agent		<p>I enclose a copy of your plan of Kirkwall [plan included in original submission] extracted from the above documents and have marked on it in red the field at Castlehame. This field is included in the existing Development Plan as a development area. We note that the field has now been omitted from the draft Local plan of May 2016. We wish to object to this removal in the strongest possible terms. It is understood that the reason for the removal of the field from the list of developable areas is due to the perceived possibility of flooding.</p> <p>I enclose a copy of drawing no C201E showing the site owned by [name supplied] - drawing enclosed with original submission. You will note that the whole of the site lies above the 3.25 m contour line which SEPA claims is the level of the 1 in 200 year extreme high tide and about 80% of the site lies above the 3.85 m contour which allows for a 600 mm freeboard above the extreme high tide level. There is more than adequate space to build a house on this site without having any concern due to tidal flooding. The site slopes quite steeply to the west allowing rapid run-off of any rainwater, consequently there will be no problem with fluvial flooding. As there will be no problem of any sort regarding flooding, either tidal or fluvial, there is no reason to remove this area from the areas defined in the existing local plan as development areas.</p>	This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.	
171	00515	Agent		<p>With SUDS already in place and services being installed for the three self- build plots which have already received planning permission adjacent to xxxxx site there is no reason to remove the area from the local plan due to lack of services. With the services and SUDS being located in the field to the west of the site I urge Orkney Islands Council not to remove any part of the field from the area designated as developable land in the proposed Orkney Local Development Plan.</p>	This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.	

172	00516	Agent		<p>I enclose a copy of your plan of Kirkwall extracted from the above documents [plan included in original submission] and have marked on it in red the field at Castlehame. This field is included in the existing Development Plan as a development area. We note that the field has now been omitted from the draft Local plan of May 2016. We wish to object to this removal in the strongest possible terms. It is understood that the reason for the removal of the field from the list of developable areas is due to the perceived possibility of flooding.</p> <p>I enclose a copy of drawing no C201F showing the site owned by [name supplied] - [drawing supplied in original submission]. You will note that 80% of the site lies above the 3.25 m contour line which SEPA claims is the level of the 1 in 200 year extreme high tide and about 60% of the site lies above the 3.85 m contour which allows for a 600 mm freeboard above the extreme high tide level. There is more than adequate space to build a house on this site without having any concern due to tidal flooding. The site slopes quite steeply to the west allowing rapid run-off of any rainwater, consequently there will be no problem with fluvial flooding. As there will be no problem of any sort regarding flooding, either tidal or fluvial, there is no reason to remove this area from the areas defined in the existing local plan as development areas.</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	
173	00516	Agent		<p>With SUDS already in place and services being installed for the three self- build plots which have already received planning permission adjacent to xxxxxx site there is no reason to remove the area from the local plan due to lack of services.</p> <p>With the services and SUDS being located in the field to the west of the site I urge Orkney Islands Council not to remove any part of the field from the area designated as developable land in the proposed Orkney Local Development Plan.</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	
174	00517	Agent		<p>I enclose a copy of your plan of Kirkwall [plan included in original submission] extracted from the above documents and have marked on it in red, the field at Castlehame. This field is included in the existing Development Plan as a development area. We note that the field has now been omitted from the draft Local Plan of May 2016. We wish to object to this removal in the strongest possible terms. It is understood that the reason for the removal of the field from the list of developable areas is due to the perceived possibility of flooding.</p> <p>Part of the field has recently been granted planning permission for three self-build sites together with all infrastructure including a large SUDS detention and treatment area. The SUDS area is the arbitrary area below the 2.5 m contour line and has an area of approximately 0.19 ha. This together with the area which has received planning permission equates to nearly 0.5 ha.</p> <p>I enclose a copy of drawing no C201C [drawing enclosed with original submission], This is based on the drawings which were recently submitted for the planning application for the three serviced sites. This drawing shows the areas of land at Castlehame owned by xxxxxxx which are above the 3.85 m contour line and between the 3.23 m and 3.85 m contour lines.</p> <p>If we accept the 1 in 200 year return period high tide level as often quoted by SEPA, the 3.25m contour line represents the high tide</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	

				level and the 3.85 m contour line represents the line where all floor levels and routes of escape during periods of flood must exceed this level. (continued)		
175	00517	Agent		<p>The area above the 3.83 m contour is 0.56 ha giving a total developable area of 0.74 ha but not allowing for the floor levels or escape routes to be below the 3.85 m contour. This area will easily accommodate seven serviced sites together with access and infrastructure. Most of the infrastructure will be provided as the sites which have recently received planning permission are serviced and only an extension of the services will be required.</p> <p>It is improbable that xxxxxx would wish to develop more than seven sites as, together with the three recently approved ones, any further addition would probably require widening the Carness Road back towards Kirkwall.</p> <p>With a total area of 1.24 ha at present being developed and a potential development area above SEPA's predicted flood level it would be very short sighted to remove this area from the Development Plan as a developable area particularly with the demand for housing sites in and around Kirkwall.</p> <p>Even with this developable area well above the perceived flood risk area we should examine the possibility of flooding in the field. Firstly, by looking at page 71 of the current local plan (Policy 0 I), it can be seen that the contour lines or flood potential lines bear little resemblance to fact. Compared to the accurate terrestrial survey submitted as part of various planning applications for this field it can be seen that the potential flood pattern as depicted on the local plan is too far to the north and has high points where there in fact low points and vice versa. This plan should be ignored if any decision is being made regarding flooding in this field.</p> <p>(continued)</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	
176	00517	Agent		<p>I must also query the level of the 1 in 200 year return period extreme high tide as regularly quoted by SEPA. Using Admiralty Tide Tables and the document "Delivering Benefits through Evidence - Coastal Flood Boundary Conditions for UK Mainland and Islands" as produced by DEFRA, SEPA, the Scottish Government and the Environment Agency, I would make the following observations. The study area for this document includes Orkney, whereas previous studies did not.</p> <p>The extreme sea level values are for still water only. They do include storm surge but do not include any local increases in sea level that may be induced by onshore wave action. This wave set-up is estimated separately and is included in the addition of 600 mm free-board as required by SEPA.</p> <p>The 1 in 200 year return period still water level is easily calculated from tide tables and the return period calculation as tabulated in the above mentioned document.</p> <p>If we take the highest astronomical tide (H.A.T.) from the tide tables and add the 1 in 200 year add-on from the above document the 1 in 200 year extreme still water sea level is achieved.</p> <p>Wave run-up is more difficult to calculate as there are about 40 different parameters to take into account e.g. Seabed roughness coefficient, seabed profile, beach profile etc.</p> <p>(continued)</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	

177	00517	Agent		<p>Class A tide gauges are maintained at Class A sites by the Proudman Oceanographic Laboratory,. These sites include Lerwick, Wick, Aberdeen etc but not Kirk wall. From the Admiralty Tide Tables HAT at these sites is:</p> <p>1 in 200 year return period extreme level for each of these sites is: Lerwick 1.87 m = an increase of 0.59 m Wick 2.89 m =an increase of 0.60 m Aberdeen 3.17 m = an increase of 0.62 m</p> <p>Similarly add-on figures can be found for Stornoway, Ullapool, Kinlochbervie, Moray Firth etc</p> <p>Where the add-on is entirely due to atmospheric depression, it is reasonable to assume that it is fairly constant across the north of Scotland at an average 0.6 m. This equates to a drop in barometric pressure of 60 millibars or about 2 inches of mercury.</p> <p>Highest astronomical tide at Kirkwall is 3.5 m chart datum= 2.1 m AOD Newlyn. Adding the difference between HAT and the 1 in 200 year return period level at Wick, i.E. 0.6 m to this we get the 1 in 200 year return period level for Kirkwall, i.E. 2.1 + 0.6 = 2.7 m AOD. 1 in 200 year level as regularly quoted by SEPA is 3.23 m AOD, i.E. A rise of 1.13 m above HAT. This figure is nearly double that at any other port in the north of Scotland. It would require a barometric drop of 113 millibars or about 4 11 inches of mercury. Surely this cannot be correct.</p> <p>The highest witnessed still water level was in the early 1990s when still water was about 1 mm above Ayre Road level, i.E. 2.6 m AOD. (continued)</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>
178	00517	Agent		<p>1 also enclose drawing no C201D [drawing included with original submission] showing the extent of land above the 2.75 m contour line and the 3.35 m contour which would allow for wind driven wave run up as was seen during the extreme surge conditions of December 2005 at Kirkwall Harbour and Ayre Road.</p> <p>During this extreme event in December 2005 the field flooded up to the 3.2 m contour line. There was prolonged extreme heavy rain and the culvert draining the adjacent ditches and adjacent fields had collapsed preventing the fluvial water from reaching the sea and causing the flooding. A collapsed drain, sewer or culvert would cause flooding anywhere. It has now been replaced with a new sea outfall.</p> <p>There are many photographs in existence showing this flood in the field with the owners of these photographs claiming that the water is tidal. This is incorrect. XXXX has photographs taken at the peak of high tide on the beach which clearly show that the sea level is between 500 mm and 600 mm below the fluvial water level.</p> <p>If we were to take 2.75 m AOD as the 1 in 200 year tide level and add 0.6 m for wave run up, surge etc to give a level of 3.35 m AOD, almost the whole of the field with the exception of the area dedicated as a SUDS detention area is above the tidal flood level with an area equal to 0.73 ha above the 3.35 m contour line allowing for escape route and floor level 0.6 m above tide level.</p> <p>If this were to be accepted, the area available for a further seven</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>

				<p>sites and their access road would allow a pleasantly spread out development, much more so than the development which would be possible with floor and escape levels above 3.85 m.</p> <p>Even though the area of land to the south of the SUDS area would be above 2.75 m with part above 3.35 m, xxxxx would have no intention of developing that area as it is felt that the limit of development should remain at a further seven (ten in total) sites due to constraints posed by the width x#-</p>		
179	00517	Agent		<p>Conclusion</p> <p>The flooding of part of the field in December 2005 caused by extreme rainfall which could not drain to the sea due to a collapsed culvert (now replaced) which coincided with an extreme tidal surge, gave the impression that this was tidal flooding. It was not. The flooded area has now been incorporated as a SUDS detention basin. The contours and flood plan as shown in the Orkney Local Plan are incorrectly shown.</p> <p>The 1 in 200 year extreme high tide level as accepted by SEPA is too high by nearly 600 mm. If necessary we are prepared to engage the Proudman Oceanographic Laboratory to provide a definitive 1 in 200 year tide level for Kirkwall Bay instead of the range of levels which SEPA keeps insisting are correct. Even accepting SEPA's levels, there is adequate developable land for a further seven sites. With this land readily available, above even SEPA's tide levels and the field already serviced it would be extremely short sighted to remove this suitable area from the development plan.</p> <p>Even though the whole of the field is above the extreme tide level of 2.7 m, with the exception of the SUDS detention area, due to constraints imposed by the width of Carness Road, xxxxxx would have no intention of developing the area of the field to the south of the SUDS area.</p> <p>As that area could be used for recreation purposes by the residents I would suggest that even though no construction would be intended in that area, the whole of the field should remain as part of the Kirkwall Development Area.</p> <p>I urge Orkney Islands Council to retain the field as shown in the Development Plan as an area suitable for immediate domestic development.</p>	<p>This proposed modification to add an area of land within the settlement boundary of Kirkwall has been taken forward in the examination process with the Scottish Government through Issue 18 - Kirkwall (Carness). The Scottish Government's appointed Reporter has considered the planning case and has recommended that no modifications are made, meaning this land will not go forward as part of Kirkwall. The findings of the Examination Report are binding.</p>	