

Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	HWLDP-MIR-165
Organisation/Individual:	Mr Ian Cowan

Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (Please Specify)	

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	x
Inverness and A96	x
The A96 Corridor	x
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	x
Development of Local Centres	x
Wider Countryside and Fragile Areas	x
Population and Housing	x
Housing in the Countryside	x
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	
Natural, Built and Cultural Heritage	x

Previously used Land	x
Wild Land	x
Water Environment	x
Renewable Energy	
Flooding	
Waste Management	x
Air Quality	x
Sustainable Design	x
Business and Industrial Land	x
Accessibility and Transport	x
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	x
Forestry and Woodland	
Minerals	x
Open Space and Physical Activity	x
Access to the Outdoors	x
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

General comment re: no. and purpose of HWLDP and Area wide LDPs
 Vision objectives could have fixed targets (SMART targets suggested)
 Improved public transport crucial/integral
 More detail required for dispersed growth option: concern over development in Kirkhall
 Incorrect to assume such a high rate of population growth

Action Sheet Completed by:	GW
Date:	09/12/09

Dawn Sutherland

From: Ian Cowan [REDACTED]
Sent: 05 November 2009 19:39
To: devplans
Subject: Highland-wide LDP Main Issues Report - response

Please find attached my response to the Main Issues Report. Please acknowledge receipt.

I should be grateful if you would let me know in due course how my comments have been taken into consideration.

Ian Cowan
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Inverness IV5 7PD
tel. [REDACTED]

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Highland-wide Local Development Plan - Main Issues Report, August 2009 – a response

General comment on the Highland-wide Local Development Plan

The rationale for having two Local Development Plans for every part of the Highlands needs to be clarified. It is stated in the Main Issues Report (MIR) that the Highland-wide Local Development Plan (the Plan) will set out the policies for decisions on planning applications across the Highland Council area, so it will draw together and replace many of the planning policies contained within the existing Local Plans, particularly those that relate to the general approach to development. But the three areas to be covered by their own separate LDPs (Caithness & Sutherland, West Highland, and Inner Moray Firth) all seem to me to be of different enough character to merit having their own distinct planning policies, setting out a general approach to development that is relevant to that area. The Highland-wide LDP seems to be the same as the Highland Structure Plan in everything but name, and structure plans are no longer required, so without better justification, it might be perceived as an unnecessary layer of bureaucracy.

Vision for the Highlands (section 3)

Broadly I support the vision as set out, but several of the objectives would benefit from having fixed targets or being otherwise more SMART: Specific, Measurable, Achievable, Realistic, Time-limited.

For example, the objective “to help Highland take the lead” in reducing CO₂ emissions, which I fully support, is completely vague and woolly, perhaps deliberately so. It will only be meaningful if the Plan sets targets which are more ambitious than those set by the Scottish Government in the Climate Change Act (see p.49). A target should be identified for each sector of the economy. The Council should at least sign up to the 10:10 campaign – 10% reduction by 2010.

Also, although it is good to include positive objectives, the purpose of the plan is to guide development, and the planning system is much better suited to preventing ‘bad’ development than it is to promoting ‘good’ development. For example, the objective “to ensure that new developments contribute towards reducing the need for travel and encourage people to walk, cycle or use public transport”, which again I fully support, is much less measurable and achievable in practice than an objective “to ensure that new developments *do not* contribute towards *increasing* the need for travel and encourage people to use *private* transport” or an objective “to *presume against* new developments that *do not* contribute towards reducing the need for travel and *do not* encourage people to walk, cycle or use public transport”.

A target for increasing use of public transport would also be welcome, e.g. 10% increase by 2010.

The Spatial Strategy (section 4)

Inverness (Q1)

There is a danger that, if all the listed development proposals go ahead, including the new road links, Inverness could go the way of other cities in Scotland and end up with many of its streets over-run by traffic for several hours of the day, increasing air pollution and other risks to non-car users. There

is plenty of evidence that the construction of new road links (such as the much discussed 'western link' from the Holm roundabout to the A82) not only releases pent-up demand for road-space, but also increases car usage permanently, because people who have shifted to using public transport see such new links as an opportunity to revert to their cars. The relatively quiet streets of Kinmylies and Charleston (including the main road right beside the school) could thus become more dangerous.

It is crucial therefore not only that improved public transport, cycling and pedestrian facilities (as mentioned at the 4th bullet-point of the Preferred Option) are integral to any such proposals, but that measures to constrain demand for travel are put in place, such as ensuring that the new 'expansion sites' along the Southern Distributor Road are properly serviced with shops, schools, post offices etc., promoting car-free zones, and designing all new roads to keep speeds down.

Otherwise I agree with the Preferred Option.

The A96 Corridor and the alternative "dispersed growth option" (Q2)

One feature of the A96 Corridor which does not feature very highly in the MIR is its low-lying coastal character. This may make it prone to flooding, especially as sea-levels rise and storm events become more frequent and intense over the coming decades. The Whiteness development seems particularly exposed to these risks.

What strikes me most about the "dispersed growth option" (i.e. the idea of using the area to the north of the Cromarty Firth for long-term growth, as an alternative or in addition to the A96 Corridor) is that hardly any thought appears to have gone into developing this or any other option, making it very hard to evaluate them seriously as alternatives.

Certainly, the level of detail given in the MIR about the "dispersed growth option" is pitiful. Kirkhill, where I live, is mentioned very briefly, but it is hard to work out what is proposed, even from reading the Council's Inner Moray Firth Ports and Sites Strategy, which gives no further detail. The map on page 14 of the MIR does not even show Kirkhill as a "settlement for growth". Residents of Kirkhill are left to assume that it is one of the "other communities in Inverness-shire and Easter Ross" towards which "additional development" could be "steered", and that "a much higher level of growth" (over and above local housing demand) could be accommodated.

If this means that Kirkhill is ear-marked as a potential dormitory settlement for commuters travelling north to work around the Cromarty Firth, I do not want to see Kirkhill develop in this way, and I do not believe that the majority of village residents would want it either. Kirkhill has seen considerable growth over the last 5 years, and needs time to settle into its new shape and size. If there is local demand for new housing, that is a different matter, but I am not keen on a strategic surge in the growth of Kirkhill, partly because of the growth in commuter traffic that this could entail. Even if the re-opening of the rail-halt at Kirkhill is proposed, that in itself would create a huge potential increase in traffic movements past the primary school, with consequent road safety problems.

So overall I agree with the Preferred Option, subject to proper flood risk management.

I broadly agree with all the preferred options under questions 3 to 10, and have no specific comments on them, apart from the following:

- **Easter Ross & Nigg (Q9)**

- Consideration should be given to building a railway spur to a new railhead at Nigg, in order to divert freight and commuter traffic from the roads.

- **Development of local centres (Q10)**

- It is not entirely clear that Beauly is identified as a Local Centre. If not, it should be.

The wider countryside (Q11, and Appendix)

It is not entirely clear if "the countryside" includes the hinterlands of the major centres shown on the map, and therefore whether this policy will apply to the area around Kirkhill.

Whether it does or not, the policy should take into account the objective mentioned above, namely "to ensure that new developments contribute towards reducing the need for travel and encourage people to walk, cycle or use public transport" (or one of the SMARTer objectives I have suggested). Clearly people living in rural communities need to use private transport, but new developments should be planned with the likely availability of public transport in mind. Well-sited developments could even help to make some currently uneconomic rural public transport routes more viable.

Developments that encourage people to live and work in the countryside, without increasing the demand for travel (especially commuting), should be favoured over those that purely meet supposed demand for housing in the countryside.

The policy set out in the Appendix should therefore include an extra criterion relating to the impact of proposals on the demand for travel.

Policy options for the Plan (section 5)

Population and housing (Q12)

I do not agree that it is either realistic, or desirable, to assume the highest projected rate of population growth. With evidence that the influx of Eastern European population is now reversing, I do not think it is correct to assume such a high rate of growth. I also believe it is wrong to associate increased population with increased economic growth, and wrong to associate increased economic growth with increased well-being.

I do not therefore agree with the Preferred Option. I prefer the stated alternative, but without the negative assumption about economic slow-down.

Housing in the countryside (Q13)

As stated above in relation to the wider countryside, planning policy should take into account the stated objective "to ensure that new developments contribute towards reducing the need for travel and encourage people to walk, cycle or use public transport". Clearly people living in remote rural communities need to use private transport, but urban hinterlands are generally well served by public transport, and new developments should be planned taking into account public transport routes.

Developments that encourage people to live and work in the countryside, without increasing the demand for travel (especially commuting), should be favoured over those that purely meet supposed demand for housing in the countryside.

I do not agree with the Preferred Option. I prefer the stated alternative no. 1, namely, restrict further building in the countryside to what is required for agricultural or other rural business needs, including new rural business. The supposed disadvantage of this approach (that it "would not offer the opportunity for further development that fits well with the landscape...") is specious, because what fits well with the landscape is largely a matter of personal taste.

I broadly agree with all the Preferred Options under **questions 14 to 18**, and have no specific comments on them, apart from the following:

- **Retail (Q17)**

There should be a moratorium on all new supermarket developments in Highland, pending new planning laws to encourage fair competition between retailers of all sizes.

Natural, built and cultural heritage (Q19)

I strongly support the Preferred Option.

Previously used land (Q20)

I strongly support the Preferred Option. The former Longman landfill site, for instance, should be allocated for a new strategic waste management facility. Without expensive remediation it will be decades before it is suitable for anything other than industrial use.

Wild land (Q21)

I agree with the first part of the Preferred Option, but not the second. The Council should operate a presumption against development on wild land, as this land should be held in trust not only for the rest of the nation, which does not have any such land, but also for future generations, who may not be able to experience it otherwise. The presumption should only be overturned for proposals that have over-riding environmental, health or safety benefits.

The designation 'wild land' should not be given lightly. There should be very few signs of human influence, and the areas should be large enough to give a true sense of wilderness.

Water environment (Q22)

I strongly support the Preferred Option. Local authorities have a statutory duty to exercise their planning functions, including development planning, in a way that secures compliance with the Water Framework Directive, so the stated alternative would arguably be unlawful.

Renewable energy (Q23)

I strongly support the Preferred Option.

Flooding (Q24)

I favour the stated alternative (i.e. presume against development in flood risk areas) in addition to the Preferred Option. The supposed disadvantage of this approach (that it “might not allow for solutions to provide further protection from flooding...”) is misleading, because very often, flood protection in new developments in areas of flood risk simply pushes the problem elsewhere, and increases flood risk overall by using up land that could otherwise absorb some of the flood waters.

Waste management (Q25)

I favour the stated alternative (i.e. allocate land specifically to accommodate strategic waste management facilities) in addition to the Preferred Option. This issue has been delayed for too long, and it is time we bit the bullet, stopped exporting our waste, and made strategic decisions across the whole Highland area, rather than deferring the decision yet again for the 3 area LDPs.

The former Longman landfill site should be allocated for such a facility. I understand the Council wants to put housing there, but without expensive remediation it will be decades before it is suitable for anything other than industrial use. I would support the siting there of an imaginatively designed energy-from-waste plant, subject to prior segregation of waste streams and strict emission controls.

Air quality (Q26)

I strongly support the Preferred Option.

Sustainable design (Q27)

Broadly I support the Preferred Option, but I would propose a more ambitious approach, which would require all new developments to meet increasingly tight energy efficiency standards, as materials improve, and be assessed on their overall carbon footprint, from cradle to grave. Thus Highland could lead Scotland not only in production of renewable energy, but also in reduction of energy waste and CO₂ emissions.

A target for reducing CO₂ emissions from the housing sector should be identified, as part of the proposed overall target for emission reductions.

Business and industrial land (Q28A)

Broadly I support the Preferred Option, but I would propose a more ambitious approach, which would require new development proposals for over 50 (rather than 100) houses to include mixed use proposals for business and commercial developments.

Accessibility and transport (Q28B)

Broadly I support the Preferred Option, but I would propose a more ambitious approach to reducing transport emissions, involving the identification of a target for reductions from the transport sector, as part of the proposed overall target for emission reductions.

If there was a choice between investing in dualling the A9 and dualling the Highland main railway line, I would opt for the latter, enabling freight to be diverted permanently from the A9, thus removing one of the main causes of driver frustration and accidents. Investment in rail consistently shows better rates of return than investment in roads.

I broadly support the Preferred Options under questions 29-33.

Coastal development (Q34)

I prefer the stated alternative, as there are too many poorly sited fish farms in scenic areas and on migratory routes of wild fish. Atlantic salmon are a European protected species, and the Council as planning authority has obligations under the European Habitats Directive in that regard.

Forestry and woodland (Q35)

I strongly support the Preferred Option.

Minerals (Q36)

I prefer the stated alternative, in order to limit the development of new quarries to non-sensitive locations. At the very least, the Council should require all such developments to deliver mitigation and restoration measures, not just expect them to.

Open space and physical activity (Q37)

I strongly support the Preferred Option.

Access to the outdoors (Q38)

I strongly support the Preferred Option.

Ian Cowan

4 November 2009

