

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

Reference Number:	HWLDP-MIR-54
Organisation/Individual:	Brian Lynch

Action:

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

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

Key:

Background	Spatial Strategy	Policy Options	Consultation
-------------------	-------------------------	-----------------------	---------------------

Notes:

Response should: clarify why no signature (point 2 – general comments)
Wide ranging detailed comments: A96 corridor, re-use of brownfield land, developer contributions, spatial strategy, population/economy, sustainable development and climate change.

Action Sheet Completed by:	GW
Date:	8/12/09

24

Dawn Sutherland

From: Brian Lynch [REDACTED]
Sent: 30 October 2009 17:32
To: devplans
Subject: Feedback on HWPD: M.I.R

As requested in the document currently out for consultation, here is my feedback.
Thanks, Brian Lynch (Contact details on word doc)

[REDACTED]

This email has been scanned by Netintelligence
<http://www.netintelligence.com/email>

Summary: An interesting starting point for an important conversation-but just the starting point. You've requested comments and I've supplied them as I see things: and in the context of a Region I'd like to see (a) unspoiled by a misguided drive for artificial population growth through inward migration (b) a desirable and safe place to live (c) a location that rewards those who make the effort to contribute to its economic success. I now look forward to hearing the key messages from the consultation phase. There is an opportunity here to build trust and confidence with the citizens of Highland Region by really listening-even if the first reaction may to dismiss anything other than unqualified acceptance.

Brian Lynch, "Benview" Sandown Farm Lane, Nairn. Tel: [REDACTED]

General Comments:

1. Validity of Feedback on Main Issues Report. 80 pages and 28 supporting studies to review and comment in 12 weeks is a very daunting task for a lay person. It will be interesting to see if there is a meaningful written return from a significant % of citizens of the highlands.

Question: What % return is considered a representative view of the people of the highlands: such that H.C is confident that it has a mandate from the people to proceed or indeed a clear signal that the plan is not supported?

2. Report Authorisation & Sign-off. The report is issued under the general council banner and that of the planning and development service. There is no signature sheet approving and/or accepting the report-either by the Director of Planning or the Leader of the Council (or anyone else for that matter). This type of planning is of such importance to the future of the Highlands that as minimum our elected representatives should sign to confirm to the taxpayer they represent that they have read and endorsed it. They are as pressed for time as the rest of us but they are our elected representatives and the future of the Highlands is being decided here.

It took me the equivalent of over 3man-days to review the main issues report-it behoves our leaders to put in the same effort-and to sign it off. Putting your signature to a report is always mind-focussing and it also makes clear where accountability lies for the success (or otherwise) resulting from subsequent application of the plan.

3. The population projections from GROS are biased with an aspirational assumption of a very high level of inward migration. This is for (a) an economic counter to the decline of the earning population and (b) to satisfy a political lobby focussed on building industry jobs and generating profit. "Aspirational" justifications for enacting development plans, is conceptually a notion that is(a) not necessarily well understood by many people in the Region (b) In reality also illogical as an economic tool as any migrants will age in parallel with the existing population. These aspirations are certainly not brought to the fore in the report but "buried" at p33/34. It should be at the fore of the report as it is the key principle underpinning the whole planning "raison d'être" for Highland Region.

It's also worthy of note that the Scottish Govt has been challenged publicly (Oct 2009) on their immigration proposals by the Prime Minister-who believes that it is not within their remit to tamper with British immigration policy. Until this is resolved, the population projections being proposed are a questionable premise on which to base the plan for long term future of the Highlands

4. Alternative locations for development, particularly north and south of Inverness should be explored and concepts costed before simply developing the alleged easy option of the A96 corridor. There is great potential here to spread the economic wellbeing further out and encourage highlanders to remain in the region with their families. Indeed if you draw a line between Thurso and Fort William (diagram page 1) then the main focus of the plans proposed development activities is focussed to the right of that line. The contents therefore do not seem to match the title of a "Highland-Wide" Plan.

5. Infrastructure provisions should be in place prior to any further significant “green field” development being approved. Agreements or “commitments” in principle are not contractual and will soon be forgotten or simply not honoured-and there is no enforcement mechanism to back this up. This is not a logical basis on which to proceed as it’s the taxpayers (and voters) who will suffer the consequences.
6. New Town developments or the re-furbishment of “brown field” sites should be the preferred option to “bolting on” large developments on existing towns-always assuming that realistic population projections support the proposed house numbers in the first place. The design and construction activities associated with new towns should have little interaction with adjacent activities & there no clash with existing “built environments”. The real prize in new town (or indeed that of developments within existing settlements) design is of course remembering and learning from the ghastly mistakes of the past and not to see then repeated under the guise of some new industry buzzword (e.g. Ferguslie Park equates to a “high density urban” housing scheme and having lived there it’s not the type of culture or housing that I want to live in again!)
7. Energy Needs: There is no mention of power generation strategy for an aspirational growth to a region of 500,000 people (and all their energy demands). Irrespective of HC’s expansion aspirations, ageing nuclear and polluting coal stations are due to shut down (or be limited on running hours due to EC legislation) soon. Where is HC’s energy supply and demand strategy and implementation plan which ensures adequacy of supply now and in the future? There will be flat calm days when windmills stop and days when water-borne renewables go down from storm damage-so a reliable source of back-up generation capability is required. A key issue, and one which needs both thought and public transparency before aspiring to import large numbers of people to these Northern climes
8. Employment Growth Prospects must be made transparent and the probability of delivering them only regarded as confirmed when contractual agreements are signed with businesses. A mixture of undefined “aspirational” job numbers alluded to by developers, politicians and anyone else is no guarantee of a local economic turnaround-and certainly questionable ground on which to launch a mass house building programme.

Jobs in the house building industry are transient and many workers are “travelling men”-these cannot be classed as creating long term, residual jobs in the community. The possibility of up to 20,000 new jobs has been quoted-where and what are these and what is the probability of delivery of these numbers? (eg P10,P50,P90?)

Unemployment in Scotland is at peak levels and we need some degree of employment certainty before importing anymore people into this area. Otherwise we end up with “service industry” jobs (not notorious for the pay) or local authority growth (simply another growth of overhead costs to the taxpayer). Worse we end up with a massive population growth funded only by social benefits and taxpayer contributions: and double the perceived problem of loss of taxes from the ageing population.

9. An additional planned prisons provision is not obvious in the body of the report. Irrespective of their social back ground, doubling the population of the Region by high levels of inward migration will see a proportionate increase in crime. Prisons (notwithstanding the sensitivity over physical location) take time to develop, fund and construct and the Inverness prison is at capacity. Where is the requirement for prisons modelled and discussed?

Detailed Comments on Main Report

Section 1.

1. (Page 1: para 1). Whose clear vision is being set out here ?(HIE/HC/Consultants?/The Taxpayers?)
2. (Page 1: penultimate para)Who is the “we” in “how we want the area to change”
3. (Page 1:last para) Who is the “development industry”? (Property developers and house builders have their own agenda and it differs from that of many of the public).

Section2. NPF2

1. Nothing listed here under “Key Highland Issues” identifying (a) HIE growth aspiration for the Regions growth (500,000 people) (b) Scottish Govts inward migration strategy proposed as a means of funding govt’s loss of operational revenue from the ageing, indigenous working-age population (c) the challenge for meeting increasing healthcare costs of the elderly. Suggest that here points **must** be brought out here and made clear to the public.
2. Further, reference to Scottish Govt policy (Scottish Planning Policy) currently means a govt where the SNP sets the strategic direction. It is a possible outcome that they may not retain this role beyond their current term. How is a change of strategic leadership factored into the decision making process so that time and effort are not wasted?

Section3.-page 4

1. **Vision:** “The Highlands will be one of Europe’s leading regions”-which regions and what parameters are we comparing against & how will success be judged? i.e. what are the benchmarks we will measure progress against? .If there are non then the vision does not hold up and in turn the HWDP has no credible anchor point.
2. **Sustainable Highland Communities:** Artificially adjusting populations has been tried at other times in history and needs considerable thought and the projection of the consequences 20years ahead (plan end period) before commitment to this approach. The baby boomers (always a population aberration during their progress through the system)will be well into their mortality phase and this complemented by a falling population means there will be plenty of housing available if nature is allowed to take its course
3. **Bullet 3.** This is already an attractive area for residents to move to and simply building homes does not bring (wealth creating) jobs. The last thing HC (or any other service organisation) needs is more overhead costs from even more service jobs (which hit the ratepayers pocket). Dangle the carrot of building programmes to prospective manufacturing based corporations but do not construct in anticipation-history will show that two worlds wars and a series of boom and bust economies have left few major (other than the traditional staples) industries as long term players in the Highlands. Get to the bottom of why that is the case before building homes with little prospect of wealth creating employment for the “new arrivals”.
4. **Safeguarding Our Environment:** A strong focus on renewable energy sources; but this will not solve the energy shortfall of importing another few hundred thousand people over 20years. A balanced portfolio of energy sources as wind-and particularly wave power have no long term operation track record. HC should challenge Scottish govt’s hardened zero position on Nuclear and (the enforced reduction of) fossil fuel use as a necessary component of their (and HC’s) energy policy. Black-outs and crippling fuel bills are not vote winners and would be a poor legacy from our civic visionaries. There will be flat calm days and days when renewable go down from storm damage-a form of stand-by generation is required. Indeed if the stance on independence hardens, we will be dependent on an external supplier (England) to import our power-with the great economic leverage that imparts to the supplier.

5. Why does Highland need to take the lead in the so called climate-change reducing measures? Scottish Govt made much of that statement when in fact the impact of their efforts is insignificant compared to the problem but the tax burden (and that's what it's really about) is significant and will no doubt be out of proportion to benefit to the man or woman in the street

In turn Highland, in adopting this stance, has made the same rod for our backs. More pragmatic for a remote region of a very small country is to learn from the lead of others and apply the solutions at minimal cost

6. (Page 5) **A Competitive, Sustainable and Adaptable Highland Economy.**

Bullet 1. Unlikely that it's in HC's power to "provide opportunities"....."create new employment". Jobs which are simply "overheads" eg municipal services, (while fulfilling a role) do not generate wealth. An approach which states "*by 20XX HC will have secured xxx new manufacturing jobs in xx*" serves as a much more real and transparent deliverable. This is a more secure and recognisable basis for population planning that simply a general aspiration to import people in the hope that it will all come good.

7. (Page 5) **Better Opportunities for all/a fairer Highlands:** What does this actually mean? It needs a reword in laymen's terms after you've addressed the question. (and what's meant by fair in this context?)

Also there's some frank discussion needed here about personal accountability and compliance with the norms of society (a) if you're un employed it's not HC's job to sort it for you by "providing" a fix-there some self-motivation required (b) and if you really want to have a "fairer Highlands" start hammering all the folks who's rates and rents you've waived over the last few years, the road tax cheats, criminals and others who get an easy ride at the expense of the bulk of the compliant citizens

HC Q'S: Re Vision Statement-top of page 4

- a. Is it the right vision for the area? No
- b. If not why not? *The Vision is in my view a "motherhood and apple pie" statement and has (a) no bite (b) Doesn't leave me thinking-"wow I want to stay and be part of this!". I think many people will simply glaze over when they read it*
- c. (See detailed comments in 2.1 &3.1. above)
- d. As an alternative example of a Vision Statement: *"By 2030 the population decline has been reversed without mass inward migration. Highland Council are the role model for remote area regeneration and the Region is the location of choice for global employers" (the earlier statement is all "will be"-this view of how it is in 2030 is much stronger by way of commitment to the desired outcomes)*

Section 4:

1. This section title is incomplete-it should be "**Why** is there a need for growth and how might this requirement be justified and addressed across the Highlands"
2. (page 7)Para 1: That's simply a point of view-why is it essential for Highland prosperity that the development is all strung along the A96 (as opposed to perhaps areas more in need of the investment)?
All this is doing is continuing the tradition of remote settlements grouped around the hub of Inverness-there is an opportunity to do something different here and redistribute people, infrastructure and opportunities away from Inverness. This is consistent with a true regional approach rather than a city-centric one

3. **Inverness Para 1 & 2:** There's nothing here about the aesthetic quality of the developments (not the individual houses) which have taken place recently or indeed the lessons learned from the rapid expansion of Inverness (*Safeguarding our environment: page 4 bullet 2-protection or enhancement of the natural/built environment*). Frankly they are observed as a sprawling series of housing schemes as you enter from Aberdeen on the A96 and not exactly a gateway to the Highland capital
4. **Inverness Para 3:** As your report states there is compelling logic in completing city growth plans before any expansion is considered elsewhere. Inverness has existing employment opportunities and better public transport support than rural areas. It does however need (a) the city centre further pedestrianised as a matter of urgency (b) the bus route passenger uptake/utilisation reviewed to confirm value for money wrt subsidies given to bus companies
5. **Page 8 :** A bullet missing from the list here I think: which pulls all the excitement of "new" back to be cross-checked against "*Safeguarding our environment: page 4 bullet 2-protection or enhancement of the natural/built environment*" so that irretrievable change is not made until the impact is fully discussed and agreed.
6. **Page 9:** Purple Box at top "*What is our preferred option....*"

Bullet 2: Not just "how and when these sites should be developed" but also "for what purpose and in what style, elevation and density"

Bullet 3: The phasing of development on the A96 Corridor is not a given (indeed there is much public objection to this)-a less "pre-judged" wording is suggested as "*..phasing of other development outwith the city*"

Bullet 4: No reference to rail/light rail options (re-furbishing/opening old lines etc: elevated mono-rails). I would have thought it worth at least conceptual consideration as we are looking 20years ahead

HC Q'S: Question 1

Do you agree with our preferred option? Yes. (Frankly having worked in almost every major capital in the world, most of Inverness city centre sadly reminds me of Glasgow city centre more than 40years ago; and I find it a depressing place to visit.)

If not why? N/A

Do you prefer the stated alternative? No (The opening of the A96 Corridor will ultimately result in an almost unbroken line of buildings from Inverness to the Regional Boundary-have a look at the other end of the A96 sprawl entering Aberdeen-not pretty! I refer you back again to "*Safeguarding our environment: page 4 bullet 2-protection or enhancement of the natural/built environment*".

Are there other alternatives that should be considered? There are two-

1. **"Do Nothing"**-it may not be credible as an option but the mental thought process of analysis sometimes yields surprising new insights-plus the public should have a reasonable expectation that you state that it's been considered and the justification for rejection
2. **Build upwards in the city**-if high density and high level schemes are proposed as acceptable for open country sites in Nairn then the concept should be used in town where the public transport infrastructure is better and land is really at a premium. The "built environment" is also potentially less visibly impacted in town. Other city centres will, I am sure, have some quality examples to draw on. If it's not deemed appropriate in the city then we should not see it proposed outside of Inverness

The A96 Corridor

1. (Page 10). We are talking about a 20year plan and an aspiration to grow the Region to 500,000 people. Pre-supposing there is a need for further development (and this is not in any way a proven case from my perspective as a taxpayer): dismissing everything else for geographic and infrastructure reasons and **looking only East is the easy option**. Start looking at other boundary solutions now e.g. the Kessock Bridge spec must had had some expansion criteria built-in at the design stage and the people of many other countries have to construct around steep slopes out of necessity (US, Korea, Japan)
2. Last para-this only holds good now. Once you build another load of new towns and “developments” the closing statement inverts and original justification is mostly destroyed
3. (Page 11) Corridor Wide Issues: The Housing Need and Demand Assessment is flawed as follows-
 - (a) The population of the Highlands is falling (GROS)
 - (b) The housing stock in Nairn is adequate and Nairn should not be built over just to handle people decanted from other developments
 - (c) The justification for both the size, style and densities of housing proposed has no basis in fact but is underpinned by (1)the population growth aspirations of HIE , and (2)the Scottish Govts inclusion in guidelines, for the first time, of the upper level “inward migration projection” (3) this “inflated” projection is applied in lieu of the median, historic -fact based input from GROS (4) The actual total number of homes shown for Nairn- significantly exceeds even the % increase generated by using the GROS high migration factor-why and what’s the justification?
 - (d) Nowhere in this report is the economic justification made for new homes based on boosting operational government income through importing new tax payers. This to allegedly offset the ageing population and the extinction of “the baby boomers”. If this really is a relevant issue it should at least be stated
 - (e) Build houses and people will come-provide employment and they will stay. We are proposing to do this the wrong way round and, if not careful, setting up long term social problems and the related cost burden
 - (f) Each existing small community identified on the corridor had its own unique attraction for those that settled there-destroy those attractions to satisfy developer short term profit projections and our respective grandchildren inherit the legacy you left behind(“Safeguarding our environment: page 4 bullet 2-protection or enhancement of the natural/built environment”)
4. (Page 12) I’d say “**any significant (not just the full) development of the A96 Corridor Framework depends.....** .”

This is, for Nairn, certainly then consistent with the views of the Regional Convener when he rejected Deveron’s proposal (with unanimous support from INBS PARC in May 12th 2009. (Ref refusal of outline planning permission 07/00188 OUTNA-for among other reasons-“the town centre lacks the infrastructure to absorb the population growth”

5. (Page 13) “What is our preferred option for dealing with these issues?” (Purple box top of page): **Bullet 1:** “Identify and justify the development sites....” .

Bullet 2: No!-businesses and projects are littered with broken “commitments”-they are un-enforceable and both you as a planning authority and we as residents will be compromised when they are not honoured (for a bunch of practical reasons not even on the horizon right now but connected with multi agency interface issues and budgets over which H.C. have no control)!

6. **Other Options:** (1) As a minimum this would be my stated position (ie all major infrastructure in place prior to any further development) (2) My preferred option as we are taking a long view here and this will be an eternally recurring theme next time around-better to address now (and perhaps get access to EEC funding). It would also spread the economic benefit to the further north communities-more in line with my earlier proposals for a broader and active vision statement-ie success would be spread across the whole region

7. **HC Q'S: Question2**

Do you agree with our preferred option? No

If not why? business and projects are littered with broken "commitments"-they are un-enforceable and both you as a planning authority and us as residents will be stuffed when they are not honoured (for a bunch of practical reasons not even on the horizon right now but connected with multi agency interface issues and budgets over which you have no control)!

We are taking a long view here and the geographic boundary limitations of Inverness will be an eternally recurring theme each time the topic of development comes up. Better to address now (and perhaps get access to EEC devt funding). It would also spread the economic benefit to the further north communities-more in line with my earlier proposals for a broader and active vision for the regions- benefits would be seen to be spread further across the whole region and be more in keeping with the ref in HC's current vision of "sustainable communities"

Do you prefer any of the stated alternatives? Yes .1st is your "other option" No 2(look further afield for site options. 2nd is your "other option" No 2 (No development unless all infrastructure in place). Both your alternatives (1&2) should be run in parallel

A poor 3rd is developing the A96 plan (your preferred option)-the majority of people do not agree with the justification based on the alleged need for high levels of inward migration

Are there any other alternatives that should be considered? A long shot but possible consideration of land reclamation or piled construction upstream of bridge and canal entrance at Muirton

Developer Contributions in the A96 Corridor (p15)

8. Why is this tagged with "A96 corridor"-? Why not simply define a "developer contribution protocol" and drop the headlining of A96-this is not a done deal and even you have tabled some realistic (albeit risked) options
9. The developers are of course pushing back here (even to legal argument) and you may write a policy that is un-enforceable if they hold firm-particularly in the current economic climate i.e. no return for your efforts
10. Blanket policies always bite the dust and need modified when confronted by the reality of application ("no plan survives intact, contact with the enemy"-Von Moltke). Better to deal with the facts when they are known and better defined-(a)it will also help the developer see the reasoning (b) with more clarity of the problem you should get a contribution of a size more accurate, and therefore appropriate, to the problem

11. **HC Q'S: Question 3**

Do you agree with our preferred option? No

If not why? Blanket policies always bite the dust when confronted by the reality of application ("no plan survives intact contact with the enemy"-Von Moltke). Better to deal with the facts when they are known and better defined-(a)it will also help the developer see the reasoning (b) with more clarity of the problem you should get a contribution of a size more accurate, and therefore appropriate, to the problem

Do you prefer the stated alternative? Yes

Are there any other alternatives that should be considered? You could simply incorporate the infrastructure needs in the applicants scope of work and budget/pricing arrangements and get him to deliver the whole thing (most big builders have done this type of stuff before in other JV's) ie there's no money changes hands and you still get the infrastructure delivered. The builder may get economies of scale in the supply chain you can't achieve

12. **12 Pages 16, 17&18: Area Specific Issues. (East Inverness)** Your preferred option (purple box) **Bullet 1: No!**- business and projects are littered with broken "commitments"-they are un-enforceable and both you as a planning authority and us as residents will be stuffed when they are not honoured (for a bunch of practical reasons not even on the horizon right now but connected with multi agency interface issues and budgets over which you have no control)!

13. What is an alternative to this Preferred Option? Line three talks about levels of growth needed for the long term. The basis of growth is aspirational and the "needed" assumption used here is challenged (see basis of challenge page 11 comments)

14. **HC Q'S: Question 4**

Do you agree with our preferred option? No

If not why? See comments above in (12) re "promises" and impacts-at that part of the city a breakdown in infrastructure support during constriction would be chaotic

Do you prefer any of the stated alternatives? The alternative you have proposed

Are there any other alternatives that should be considered? Ditch the hotel and build houses-this is stated as the main issue not a shortage of hotels, so there's no real argument

15 **Page 18, 19 &20 (Nairn)**

16 The map shown here indicates low and medium density housing at Sandown-nowhere does it identify high density housing at Sandown-yet that's exactly what Deveron Highland proposed with the endorsement of the local planning team. Why is it not shown on the plan for people to see? The current approach to developing Sandown is not universally embraced by the good people of Nairn-time for a re-think on numbers and style. Have a look at the housing density of the new Maggot development (pretty appalling to my eye)-this is very close to density quoted by Deveron for Sandown and would just be another council sprawl. There is an opportunity to do something much better at Sandown-particularly wrt current health board policy of encouraging care in the home for the ageing population as an alternative to old folk's homes and hospital.

17 Why (para 1-line 1): is Nairn an important element in the A96 Corridor Framework?: it has no strategic significance other than an anchor point for a housing corridor.

If the option to look elsewhere (North of the Bridge or S of Inverness) is pursued then the whole Nairn plan is no longer "an important element in the A96 Corridor Framework"

I continue to assert that we should be planning based on the historic GROS basis for both the region and in particular for Nairn and not using the "new" high inward migration multiplier (or even higher numbers). Irrespective of Scottish Govt's views or policy-this is flawed logic and not a preferred solution-make the existing folks want to stay for the quality of life and reverse the falling population trend organically-we're talking a timescale out to 2020 and beyond so there is time to do this

- 18 Why (para 1 page 18) are Sandown (and Lochloy) still considered to be the priority areas for development? (Lochloy has an appalling access route-and yet you continue to permit development). Sandown can be used for much more lucrative purposes than just selling the land to housing developer-a world class resort group e.g. "Fairmont" would be interested in at least a conversation based on the view of the firth it affords alone.
- 19 Framework Outcomes: 5,000 jobs? Doing what?-where's the commitment from wealth creating employers. If you think more council employees, shop worker and hotel workers jobs (irrespective of their worth as individuals) are going to increase the average income in Nairn-think again, most are in the realms of "minimum wage". Hardly grounds for overdeveloping the town
- 20 Where's the "vision" to attract more wealth creating employers such as "Lifescan"?
- 21 The plan shown is way too small-even with glasses on-should be blown up to a full page at least. Eg what is the medium density strip to the west of Sandown?
- 22 Para 1: last sentence. Why is it important that the future development sites contribute to the ultimate delivery of the by-pass? There is no connection-Nairn's A96 stretch is already gridlocked at various places and times almost every day. ***No more development until the by-pass is built or Nairn's "traffic delay and hold-up" reputation will be top quartile and the public outcry will be overwhelming***
- 23 HC Q'S: Question 5
- 24 Do you agree with our preferred option? No.
- 25 If not why? It presupposes that the people of Nairn agree with the population growth aspirations behind the whole development of Nairn: they don't and you need to convince them (not Scottish Govt, builders or planning conventions) otherwise. This also potentially gives the green light for multiple developments to proceed virtually simultaneously (HC are looking to cut £80millions off the budget over the next three years so the pressure for cash will be on!) and (a) for the HC supervisory system to be overwhelmed (b) for the town to be turned into a building site
- 26 Do you prefer the stated alternative? Better than the first -but it's not unconditional-as it (a) disconnects local development from the A96 corridor plan (which may never happen) gives more focus and the application of HC resources to supervise and ensure the Delnies and Sandown issues as worked correctly and with the best interests of Nairn at heart. This is needed as the Sandown discussions to date are held in poor regard and they need a proper review/re-think. The key issue is still the population growth hypothesis and the justification for anything other than very modest levels of house building
- 27 Are there any other alternatives that should be considered? See 3 points listed in 28
- 28 **Option1:** Suspend this work-the real key issue is getting the population to "buy" the justification for the size of increase proposed-for they see static then falling birth projections coupled with dying baby boomers. Frustrating though it is it would get a better result than simply saying "we know best" and not taking them with you.
- Option 2** The Sandown missives are weighted in Deveron's favour-they can (and may) walk away at any time and leave the land sale unresolved.

Another option is for HC to walk away (Deveron's approach to "consultation" has not landed well on the people of Nairn so few would shed a tear over that). The topography of the Sandown site falls away to wondrous views of the Firth and I'd market that to a real heavyweight/upmarket quality international hotel group as a spa and conference venue for the North e.g. my previous note on Fairmont Hotels comes to mind. Sell them the land or take a stake in the venture for future revenue.

Option 3: Clear the town centre and build the high density affordable housing there: central for young mothers and elderly people who don't drive. Easy access to town centre-increased revenue source and better use of "brown field" location makes this an option to be considered before digging up the countryside. It also doesn't impact the route of the planned by-pass and can be externally styled to blend in with the existing surroundings (car parking underneath if that's required)

29 Page 20 &21: Tornagrain.

30 If you can justify the projected population growth methodology which necessitates Tornagrain before proceeding, then a new town on a brown field site a preferred solution to the any further "bolting-on" of big developments onto exiting towns such as Nairn. The design and construction activities should have little interaction with adjacent activities and there is no clash with existing "built environments". Page 20 last para notes "compact and sustainable"-the word "compact" rings alarm bells as many other "compact" housing arrangements in the past have been "compact-as in tenements" and brought many social problems from neighbour disputes to crime and vandalism. Compact sounds like "tightly packed" and society today is even less well behaved than when this theory was tried before. If it's a take on Poundbury principles-read the web-its far from universally liked as a place to live and the royal patron chooses to live two counties away from it!

But why wait for the period of the next 30-40 years: change the priorities and start phased construction now! This will prove or disprove the aspirational population growth model prior to irretrievably changing other town and settlements

31 HC Q'S: Question 6

Do you agree with our preferred option? No-

If not why? The basis of population growth is seen as unrealistic (out with planning and developer circles) and is based on an anticipated large inward migration of people from out with Scotland. This is social engineering on grand scale-we should try to address the problem of the falling regional birth rates first. Any "inward migrators" will also age and require support-how does this provide a long term solution economic? Also businesses and projects are littered with broken "commitments"-they are un-enforceable and both you as a planning authority and us as residents will be stuffed when they are not honoured (for a bunch of practical reasons not even on the horizon right now but connected with multi agency interface issues and budgets over which you have no control)!

Are there any other alternatives that should be considered? (1) Bring the development forward (but only assuming that it can be justified on a valid growth basis)-it's on the Scottish Govt's priority list so must have some senior support with respect to infrastructure funding priority? Put a proper infrastructure in place in an integrated manner with phasing concurrent with housing growth and make it a "showcase" project for HC. Further seek the potential to expand it further. (2) As suggested before, why is it essential for Highland prosperity that the developments (including any new towns) are all strung along the A96 (as opposed to perhaps areas more in need of the investment)? All this is doing is continuing the tradition of satellite settlements grouped around the hub of Inverness. There is an opportunity to do something different here and redistribute people, infrastructure and opportunities away from Inverness. This is consistent with a true regional approach rather than a city-centric one. Look at options North, South or West close to main truck roads, rail lines and air-strips-they don't all run along the A96 corridor. Despite environmental propaganda-the car is here for a long time yet(3) Really think out of the box and build a new international airport and use the existing site for housing (they did it with Glasgow/Renfrew airports as the city expanded). The current airport has no cross runway to speak of and is already limited by the firth and planned development on its boundaries. If the region is really going to grow to 500,000 people it will be required

32 Smaller Settlements in the A96 Corridor: p22

33 This section shows the final objective of the planners and developers very clearly. Taken in its entirety this and the proceeding pages show the total urbanisation and industrialisation of the A96 between Inverness and Nairn/Auldearn-and it is a picture unlikely to be welcomed by the current inhabitants. Cawdor is a unique case in the midst of a list of scheduled housing schemes. It's a private venture and geared at making long term wealth for the investors-it's not just housing to attract inward migrants

34 HC Q'S: Question 7

Do you agree with our preferred option? Yes-but its qualified by the comments that the growth projection needs to be justified to the inhabitants first and their views taken into account. The focus (as stated in the main issues report) seems to be mostly on regeneration and not mass housing development

If not why? N/A

Are there any alternatives that should be considered?

Look at land to the South of Auldearn and around Brodie for housing: the rail line comes very close to the main road at Brodie and the option for a rail halt to service commuters living between Nairn and Forres would seen a worthwhile study

35 Caithness & Sutherland (p 23/24/25)

36 P24: paras 1&3: suggests that the principle hope for economic recovery is marine renewable energy (or at least there's little else mentioned). This technology is still evolving and (while it has a place in a balanced energy portfolio) may never replace conventional power generation in reliability and output capacity in the next 20years. Why not build a Pressurised Water Reactor fed power station at Dounreay. Years of construction jobs, operating skills reside in the area so employment post construction-and of course additional, badly needed power generation for the Scottish grid.

37 Bullet 1, bottom of page 23. What are these "provisions" that must be in place?-if its alluding to infrastructure then it should be stated. If means infrastructure then you should be consistent as everywhere else (in the report) new developments are planned based on the preferred approach of "we propose to go ahead based on commitments in principle"

38 HC Question 8.

Do you agree with our preferred option? Yes. However increase scope to look at the development of new towns around Wick based on the potential offered by the transport links-including Wick airport.

If not why? N/A

Are there any alternatives that should be considered? Note comments on new PWR in "36" above

39. Easter Ross & Nigg (p26 &27)

40. HC Question 9

Do you agree with our preferred option? Yes (see other alternatives)

If not why? N/A

Are there any alternatives that should be considered? If not already considered-then look at potential for a fossil fuel power station for "peak-opping" as grid demand increases (berths, deep water, oil storage tanks, and repair facilities at Invergordon are all available)

41 Development of Local Centres (p28&29)

42 The graphic on page 28 suggests there's a gap in a sub-regional centre pattern and coverage at the boundary of Caithness and West Highland-the other seem spaced equidistantly (?)

43 Suggest the building land availability work is brought forward and a serious attempt made to advance the building of new settlements in these areas: thus spreading the inward migrants Highland Council seem committed to attract. If the focus remains fixed only on the A96 the old "empty glens" syndrome will be re-enforced for a further 30-40 years.

44. HC Question 10

Do you agree with the preferred option: Yes (but note comments on increasing scope)

If not: why not? N/A

Are there any other alternatives? Inclusion of updated mineral surveys in remoter areas using modern techniques to identify commercial quantities (e.g. using expertise from BHP Billiton or similar world leading mineral extractor)

45. Wider Countryside Areas & Fragile Areas (p30). No Comments.

46 HC Question 11 .

Do you agree with the preferred option? Yes

If not why? N/A . Are there other alternatives? None apparent to me

47. Strategy Map 9(page 31)

(a) Only Wick is shown as an employment deficit area-so why are we building up the A96 Corridor?

(b) The West Coast is singularly void of any employment deficit areas or key development locations. Why is the focus on a small part of the East Coast and what looks like 9/10's of the land mass excluded from major development efforts?

48. Section 5: Policy options for the Highland wide local plan.

49 Population Changes (p32/33) Graph-bottom page 32. This shows approx 6.8 % total population growth (ie an increase of 14,000 people) for the whole of Highland Region over the 17 year period 1991 to 2008 (219,000-205,000) (divided by 205,000) = 6.8%

I.e. an average population increase of just over 800 people per year! (or 0.004% per annum) in the period 1991-2008 for the whole of Highland Region

50. The whole economic argument is not being set out here-but it is flawed as follows-

(a) It is a very unusual economic model which uses the "upside" projection (whether cash flow or oil flow) to justify a major capital project. Particularly when this based on an unvalidated aspiration.

(b) The Scottish Govt may want this level of inward migration: the HIE may want this -but I don't think the people of Highland Region understand what's really being proposed here and if they did I doubt that you or the Govt would get their mandate to proceed based on the current inward migration proposals. The Prime Minister has already charged the Scottish Govt of tampering with the UK's immigration policy-a remit they allegedly don't have. If it is indeed the case that Scottish Govt do not have this level of decision making authority, then the whole basis of the population growth justification in the plan is worthless.

- (c) I totally reject the proposal (a) to use the high migration factor or even higher estimates as the basis of house building calculations and (b) the linked proposal to “drive” migrants to Scotland in an artificial manner. Decouple the two and let the natural process occur
- (d) If there is no significant numbers of new jobs (and we are facing record unemployment levels now) then Highland Council will be required to fund the social support required by the inward migrants plus their own increased overheads in dealing with the influx. This is not going to counter the ageing population cost issue- it will compound it! Given the 80 million deficit in the HC budget over the next 3 years: and overall level of HC debt of £150millions quoted by Mr Darling, this is an incredulous proposition.
- (e) Using service jobs and public sector jobs as “evidence of success” is also flawed- none are profit generating or particularly wealth creating
- (f) The principle projection gives a gross 16% increase over 23 years (across the Region): this is approx 37,000 people over 23 years or 1600 per year across the region or 0.007% per annum for Highland Region
- (g) The baby boomers will die out concurrently over the same period and there will be a surplus of housing-not a shortage!
- (h) The proposal for the development of the A96 Corridor are built on “aspirations” only and should be rejected by the citizens of Highland Region

51. Housing Land Requirement P34/35). This pre-supposes the acceptance of the principle of high inward migration and (as shown above) this is flawed and the logic needs reconsidered both from a practical and political perspective. Otherwise the Highlands visitors come to see will be degraded forever on the basis of a spurious mathematical assumption.

52. The table at the bottom of page 34 shows (and therefore assumes) that the high migration scenario is accepted as a given –it is not. For clarity other tables based on the two other GROS based projections should be displayed to give the whole picture as per the graph on p 32.

Further this table shows we still do not have enough land for the planned build to 2029 (34,152 required vs 27,329 actual from land audit). This suggests a need to revisit the population projection logic.

53 HC Question 12

Do you agree with the preferred option? No

If not: why not? I do not support the principles of the high inward migration calculation methodology as either logical or as appropriate to the needs of the Highland housing strategy (see comments in “50” above) this is social engineering of the worst kind.

Are there any other alternatives?

- (a) Use a mean of the GROS low inward migration and GROS principle projection as the anticipated (and more realistic) curve and monitor it for trends/deviations. Use this annual indicator for “correcting” building programme deviations.
- (b) The developers won’t like it but you won’t be influenced by them of course. Running any business carries risk and if you don’t evolve or if there’s an oversupply of house builders, then Highland Council are not obliged to artificially create work. It’s been tried in other industries (shipbuilding ,car plants) and doesn’t work in the long run-they amalgamate or go out of business.
- (c) As long as the land is identified-modern houses can be thrown up fairly quickly in response to new employers coming to the highlands so the “response lag” from builders is insignificant if the deal is right

- (d) Spread the available home sites wider across the Highlands and avoid the suburbs of Inverness training out beyond Auldearn as a result of the over development of the A96-spoiling some fine countryside in the process: and with no sound basis
- (e) Work out how many “baby boomers homes” will come free in the next 20years by applying average “age at death stats” and see what that throws up when compared to the council tax/polling records. It may give other options for acquiring housing without destroying more countryside

54. Housing in the Country side (p36/37): Hinterland/Wider Countryside

55 It is not clear from the wording of this section is talking about “countryside” as the wider countryside only (outside hinterland areas) or the combination of hinterland and wider countryside. I have assumed the later in my comments

56. Large tracts of Highland are almost void of dwellings yet the areas around existing settlements in the hinterland from Dornoch down to and including Nairn is under pressure from developers-with (a) no obvious guarantee of large scale employment in these areas (b) some evidence of high density “tenement” type design proposals from developers (eg Sandown) despite the assurances stated at p36 paras 3&4 about “not taking away from these areas” (c) infrastructure pressures

57 HC Question 13

Do you agree with our preferred option? No

If not: why not? We are in danger of creating an urban sprawl of housing schemes down the East Coast from Dingwall to Nairn-and doing it to satisfy an aspiration to implant enough inward migrants to take the Region to 500,000 souls. Hardly uplifting for (a) the tourist industry (b) the character and quality of life in small towns which attracted people in the first place (c) At the same time large tracts of the Region have few major settlements-and this will never change unless a serious pitch is made to take pressure of the hinterland areas

Do you prefer any of the stated alternatives? Alt.Option 2:

Are there any other alternatives? Move away from the “pressured” areas and look at creating at least two new (stand alone) towns (not simply ribbon developments) to the west of the line between Dingwall, Dornoch, Inverness/Nairn and Fort William. Use this approach to start to grow some new communities (see previous comments on the possibility of a new airport for the Highlands of the future). Use these new towns to test the inward migration theory and for any overspill from, or people decanted by, the redevelopment of Inverness centre. If the inward migration theory is sound, they will prosper.

58. Affordable Housing P38/39.

59. Highlands population projections (page 32) only show significant demand if a high inward migration factor is used. It difficult to see the continuing increased demand for new “affordable” homes if (a) the baby boomers die off (b) HC take a firm stance on the utilisation of housing stock in areas of surplus before building more (e.g. surplus in Caithness). (c) The indigenous birth-rate continues to fall.

60 HC Question 14

Do you agree with our preferred option? No

If not: why not? According to the Nairn Residents Concern Group study, the HNDA actually shows a surplus of houses in Nairn.

Do you prefer any of the stated alternatives? Not really

Are there any other alternatives? Build the required “affordable” homes in the new towns suggested in answering Q13. Also look at building these houses in the old style –all together in housing “schemes”. This has two advantages (a) it encourages people to work to get to something better (b) it avoids the false social principle that we should all be overjoyed at private and “affordable” living check and jowl. Many people who have worked hard for their own homes are not in favour of living close to this type of housing mainly from fear of social unrest and the impact on their investment Think Carse/Merkinch up against the Director of Planning’s front garden. I lived in Ferguslie Park in the 60’s and the theory was the good tenants “lifted” the problem tenants-rubbish! it all goes to the lowest common denominator!

61. Planning for an Ageing Population (p39/40). The problem is of course finite-us older people will die and things will return to equilibrium-unless of course HC import the next generation of ageing citizens through massive inward migration. We are the “bulge generation” and everything was skewed as we passed through the system (primary schools, secondary schools, employment prospects etc) but once we go-the problem is much reduced in magnitude.

62 HC Question 15.

Do you agree with our preferred option? Yes

If not: why not? N/A

Do you prefer the stated alternatives? No

Are there any other alternatives? Take some of the better parts of alternative option 1 and incorporate into the preferred option: e.g. adaptation of existing properties to allow people to stay in familiar surroundings if their homes can reasonably be adapted in a pragmatic manner. I.e. don’t just focus on new builds as the “be all and end all”

63 Gypsies/Travellers

A bone of contention in many areas-four issues that I see and know as sensitive from my time in Grampian (a) where you locate the sites (the Convenor or Director of Planning won’t want one next door and you can bet your boots I don’t) (b) how you enforce their proper use and control the activities carried out there (police raid on Elgin site last year) and (c) maintain housekeeping/hygiene standards on the sites (d) How do you levy costs and recoup your expenditure (my rates and taxes)?

Further it is assumed that inward migration does not bring in more travelling people from overseas or England and HC should actively monitor the proposed “points systems” proposed for the Scottish immigration agency: as these are not normally wealth creating citizens in the conventional sense. The burden of their benefit costs and policing their lifestyle will be met by the taxpayer of course (and I for one am not happy about paying out even more of my hard earned cash to “special needs” communities such as these). This lifestyle is a choice for those who follow it.

62 HC Question 16

Do you agree with our preferred option? Yes : but take the points above on board-particularly cost recovery (and control of immigration)-if no agreement to that principle then why pour our money down the drain.

If not: why not? N/A

Do you prefer the stated alternatives? No

Are there any other alternatives? Yes-don’t recognise their “special needs”. After all few pay tax and N.I and currently their group record as good neighbours is not encouraging.

63 Retailing (p42): HC Question 17

Do you agree with our preferred option? Yes : (Note that's how old tenements used to be-shops underneath them! Just need to be clear on ground rules re odour control, hygiene & service traffic access to predominantly pedestrian areas

If not: why not? N/A

Do you prefer the stated alternatives? Number 2

Are there any other alternatives? Look also to encourage expansion of further large retail centres, particularly to the West of Inverness-perhaps in line with new communities in this area. If they are commercially viable they will survive and if the aspirational population growth plan comes off they will be needed. Highland seems way behind other regions in terms of choice and size of outlets. Need to also break the "Tesco Town" image of Inverness-even if it's not true-that's the perception people currently hold

64 Developer Contributions (P43). Developers are likely to oppose this approach with a will (though it will help their estimating process)and try to turn the cost back on the Council unless you can get National legislation put through. Developers "demonstrating by open book accounting" will be a novel situation as their track record to date on transparency of facts and figures is at best inconsistent. Given the suspicion that the public have of "private deals" between councils and developers-this information must be "discoverable" and made available to the public as part of any planning application

HC Question 18

Do you agree with our preferred option? Yes

If not: why not? N/A

Do you prefer the stated alternatives? No

Are there any other alternatives? None that seem any more pragmatic

65. Safeguarding our Environment –Natural , Built & Cultural Heritage(p44&45)

What's the difference between Natural, Built and Cultural Heritage? (e.g. Does having Nairn classed as "the Brighton of the North" allow it to come under "built heritage" –and how does the Nairnshire local plan currently record the hierarchy of importance of heritage features for Nairn?

I have a very serious reservation about leaving developers (whose business driver is to maximise profit) to "address all species and habitats issues across their sites" eg Deveron's approach at Sandown was based on a "walk-about" approach during mid-winter (when most creatures are hibernating): and does not (among other things) take account of the bat population in and around Sandown Farm Lane.

Sorry but I think the HC's specialists working with govt agencies need to monitor and approve any such assessments by a developer.

HC Question 19

Do you agree with our preferred option? Partially- Bullets 1& 2 only (not bullet 3)

If not: why not? There's a very serious question mark about leaving developers (whose business driver is to maximise profit) to "address all species and habitats issues across their sites"

Do you prefer the stated alternatives? No

Are there any other alternatives? Modify the preferred option to ensure the developer is unable to be self regulating on how he addresses species and habitats off his own i.e. he can address them but the council retains quality & approval control

66. Previously Used Land (p 46)

Only comment relates to "Health warning" on contaminated site liabilities and how to ensure HC do not have them transferred onto their books with resultant time and cost impacts.(particularly with respect to old hydrocarbon or MOD sites)

HC Question 20

Do you agree with our preferred option? Yes

If not: why not? N/A

Are there any other alternatives? "Easy hit" housing land reclamation in estuaries by infill or piling or use of concrete "rafts"

67 Wild Land (p47):

HC Question 21

Do you agree with our preferred option? No

If not: why not? Not if you're enacting mass inward migration and trying to double the population of the region

Move away from the blinkered view of overdeveloping the coastal strips between Dornoch and Nairn-there is plenty of wild space to consider for new settlements (and if the inward migrators don't come in large numbers, then it will be useful for vacation accommodation) . There will still be enough "places of solitude" remaining (and the baby boomer bulge will be substantially gone in 20-30years leaving plenty of houses)

Do you prefer the stated alternative? Yes

Are there any other alternatives? None that seem any more pragmatic

68 Water Environment (p48)

HC Question 22

Do you agree with our preferred option? No

If not: why not? You would most likely need to consult SEPA anyway (as custodians of the detailed knowledge on water quality and available resources) so why attempt to ease their independence of view and action out of the equation

Do you prefer the stated alternative? Yes-maintains an integrated overview of water and sewage issues independent of commercial drivers

Are there any other alternatives? Yes: there is a better half way position where (a) you incorporate the principles of the three bullets in your preferred option (e.g. indicate on the HC dev plans) but retain the use SEPA as both the "informed buyer" w.r.t water issues and also as the "regulator" with respect to future demands and capacity/ infrastructure challenges

69 Sustainable Devt and Climate Change (pages 49-59)

70 (page 49-para 2). A laudable approach but wind and wave power currently have a limited, long term operational track record: and a limited capability for major generation capacity. When the wind and wave energy falls off-either due to storm damage or where wind/wave forces exceed operational limits: where is the back-up generation capacity coming from?. A series of generation power curves are needed confirming there will be no major power outages and showing where the back-up generation capacity is coming from. This is of particular significance for the Highland given the proliferation of suppliers in the mix. (Note the last sentence here does not make sense to me as it quotes 20% and 50% targets for the same period to 2020?)

71 (page 50-wind farms). There is some contradiction here when set in the context of a true growth strategy and falling fossil fuel generation capacity -

- (a) "Significant protection" from wind farms needs to be clearly defined eg is it a ban, perhaps a ban, etc etc
- (b) We are "shutting out" large areas of the region yet importing enough people to double the occupancy to 500,000 plus the industrial development is hoped to grow. This at a time when fossil and nuclear generation options are being "banished"
- (c) Need to be pragmatic if you really want to grow-it takes energy- and review windfarm sites on a case by case basis or the east coast will list one side with industry and people and the west will be in darkness!
- (d) If we are not realistic and apply this spread of "significant protection" we will inevitably have to back track on it (or build some conventional generation stations)or the lights may go out.

72 (Page 51 Marine Renewables: Thrust here is on "interest" and "potential", there's really no hard facts or proposals in this section as we appear to be waiting on Scottish Govts "marine spatial planning activities" for direction

HC Question 23

Do you agree with our preferred option? Yes: but with the caveats that (a) it must however initially include some conventional generation sources (fossil or nuclear) until the longer term operation evidence for renewable sources is validated (b) the " significant protection areas" (proposed for wind farms) are replaced by a "case by case" basis approach

If not: why not?

Do you prefer the stated alternative? No (too limiting for the future)

Are there any other alternatives? Yes. All power sources need a distributing system of some kind. Ensure that the generator builds in and secures the primary distribution system as part of his agreed scope and as one of the conditions of obtaining planning approval-this to include environmental impact mitigation measures

73 (Page 53 Flooding).

- (a) Para 1. How does a "sustainable drainage system and culvert" differ from what we have currently? Ie what makes it "sustainable"?
- (b) General query: Where is coastal erosion addressed or covered?

HC Question 24

Do you agree with our preferred option? No

If not: why not? Developers will argue their case from the perspective of what's best for their business plan and then be gone post construction. This will also most likely be before the theory is really tested on the full development by the first major storm. This leaves both HC and the ratepayers with the recovery costs (see recent experience in Elgin)

Do you prefer the stated alternative? Yes. It leaves control with the Council as we enter a wetter/warmer future and does not automatically preclude a review of remedial actions to address the problems. In fact to get land the developer will be beating a path to your door with solutions

Are there any other alternatives? Leave approvals with SEPA who have no commercial axe to grind and who can act as "honest broker" to the council

74 Waste Management (p54 and 55)

Assuming "best practice design" takes into account

- (a) Site screening and separation from residential areas
- (b) Combustion technologies (e.g. fluidised bed furnace), gas emission cleaning and control, plume dispersions.
- (c) Low frequency vibrations from ground flare type burners.

The real residual issue is monitoring and control of waste in and products out. ie plant operation. While the developer can "provide" the facility a third party usually operates to SEPA standards. Given some of the history of incinerators in Scotland (eg "Rechem" at Bonnybridge) HC must apply a strict due diligence process when selecting the Operator-or indeed consider operating it themselves (probably a more secure operational solution)

HC Question 25

Do you agree with our preferred option? Yes (subject to proper consultation on the locations shown on strategy diagram p54 and the alternatives)

If not: why not?

Do you prefer the stated alternative? No

Are there any other alternatives?

- (a) Cost out long term disposal overseas for burying in remote locations
- (b) Look at positioning incineration sites to the West and North of Inverness where there is less impact on people and effective plume dispersion by prevailing winds

75 Air Quality

HC Question 26

Do you agree with our preferred option? Yes

Are there any other alternatives? No

76 Sustainable Design (p57)

HC Question 27

Do you agree with our preferred option? Yes (but with the caveat that huddling houses together or stacking them and producing new version of the old housing schemes and tenements is not then made a “given” just because high density can be argued to result in low heat loss. A balanced view must be maintained on what is desirable in the lay-out of new developments wrt quality of life and its impact on the next generation)

If not: why not?

Are there any other alternatives? Disconnect sustainability from layout-if it works in a particular case that's fine but treat every design on a case by case basis as technology and materials will evolve and affect the carbon footprint argument. We may actually be able to have the best of both worlds-ie a pleasing and effective lay-out

77 (p58&59) Business and Industrial Land

HC Question 28

Do you agree with our preferred option? No

If not: why not? This is back to the 1950's with garages and small factories, small refineries, slaughter houses hard up against tenement housing. While in some case you could walk to work, it was not really a wonderful living environment. Keep workshops and factories out of immediate housing and local retail areas and there is far more synergy with our core value as a tourist destination

Do you prefer the stated alternative? Yes

Are there any other alternatives? Build larger “regional” industrial (manufacturing led) parks out of town or in existing industrial centres and serve with improved public transport links. Improves waste disposal, raw material delivery strategy and storage not to mention efficiency of logistics

78 Accessibility and Transport (page 60, 61, 62 & 63)

- (a) Page 60-list of bullets. No recognition of facilities for cars of the future e.g. recharging facilities at park and ride or within new developments. Propose this is at least considered in the HWDP as the technology breakthrough is such a commercial prize that “serious” electric cars will evolve in the next 20years
- (b) Page 61, map of air, rail and ferry links. Why does the eastern rail link need improved and what is the scope of work planned?
- (c) Page 61,last para “network of rural filling stations”-add to this “*and electrical charging points for vehicles*”

HC Question 28 (NB: previous question on p59 was also tagged as No 28)

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? (There is none stated!)

Are there any other alternatives? Possibility of High speed coastal ferry links like Norwegian “jet boats” for short distance, inner Moray Firth commuter links

79 Crofting and Agriculture (p64,65,66&67)

- (a) General question-what is the definition of a “Crofting Township” (not in glossary of terms)?

HC Question 29

Do you agree with our preferred option? No

If not: why not? Leaves the door open for developers to argue a case for something to be seen as “an essential component of the settlement strategy” or “necessary to meet an established need” If the opportunity is there the developer will exploit it! Scotland then loses prime farmland when we are intent on increasing the population by inward migration and moves to a reduced sufficiency of home supplied produce

Do you prefer the stated alternative? Yes

Are there any other alternatives? Review each case on its merits so that, for instance, land reclamation can offset losses

HC Question 30 No comments at this time

HC Question 31 No comments at this time

HC Question 32

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? No

Are there any other alternatives? No

HC Question 33

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? No

Are there any other alternatives? No

80. Coastal Development (p68)

(a) What is the council's stated vision for the coastal zone and is it consistent across our entire coastal periphery?(page 68-para 2)

HC Question 34

Do you agree with our preferred option? No

If not: why not? Too sensitive a topic (part of our food chain) to leave to “general policy’s”. Needs to be properly guarded for future generations and a proper decommissioning requirement (and funding) built into the planning and budgetary approval process (the oil business have learned much here w.r.t. decommissioning liabilities-some of it very costly due to lack of forethought)

Do you prefer the stated alternative? Yes

Are there any other alternatives? No

81 Forestry and Woodland (p 69&70)

HC Question 35

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? No

Are there any other alternatives? No

82 Minerals (p71)

HC Question 36

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? No

Are there any other alternatives? Encourage or invite global miners (BHP Billiton/Rio-Tinto) to explore and update mineral projection in Highland-to include the latest search technologies for rarer materials. Develop away from dependence only on traditional industry demands

83 A Healthier Highlands (p72&73)

(a) Why in particular has the area between Nairn and Inverness been selected as the trial zone for “green frameworks”? p72 para 2

(b) How do you “improve” open space? p72-bullett 1

HC Question 37

Do you agree with our preferred option? Yes

If not: why not?

Do you prefer the stated alternative? N/A

Are there any other alternatives? Look to the calculations on housing needs and population growth and re-assess the basis of the aspirational growth calculations as I believe the whole A96 Corridor part of the HWDP is flawed (and maybe other areas too if the same methodology is used). If the growth projection is not real then there will be plenty of green space and no new policy required i.e. the need has been removed

84 Access to the Outdoors (p73)

HC Question 38

Do you agree with our preferred option? Yes (but add a bullet on enact an education programme to ensure this privilege is not abused by the public- e.g. litter, animal abuse, dog dirt-frankly many folks have no longer hold the sense of shared responsibility once taken as a “given”)

If not: why not? Do you prefer the stated alternative? No

Are there any other alternatives? N/A