

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

Reference Number:	HWLDP-MIR-55
Organisation/Individual:	Brian Stewart

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

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	
Flooding	
Waste Management	ALL
Air Quality	ALL
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
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Notes:

Offers comment on ALL issues in MIR, but emphasis on:
A96 Corridor (incl Developer contributions) – not consistent with balanced growth
Nairn
Tornagrain
Population / housing figures questionable – unrealistic
Insufficient analysis of economic issues – major omissions in terms of hydro power / telecoms / IT
Importance of tourism not addressed

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

Dawn Sutherland

From: Brian Stewart at Virgin.net
Sent: 02 November 2009 01:57
To: devplans
Cc:
Subject: Highland-wide Local Development Plan - Comments on the Main Issues Report

Dear DevPlans Team

1. The HwLDP Main Issues Report invites comments by the deadline of 9 November 2009.
2. I attach a comprehensive and detailed set of comments, in a self-contained "Word" document of 33 pages. This follows the structure and question-numbers set out in the Report itself.
3. The paper reflects and draws on discussions among various groups of residents of Nairn, and in certain local organisations of which I am a member - including the Nairn West Community Council, VisitNairn (the Nairn tourism-promotion organisation), and the Nairn Concerned Residents' Group.
4. Some of the points in this document have already been made by me and others, directly to Malcolm McLeod and other members of the Planning team at consultation meetings that have taken place during recent weeks in Nairn. Some elements may also have been incorporated in the formal responses made by these other local groups and organisations. But I am submitting the attached paper under my own name, and the responsibility for its contents - and any errors or omissions - rests with me.
5. The Main Issues Report poses a number of serious and important questions. Some of the observations in the attached response may appear critical, and some query or challenge existing planning policy or future proposals. I hope however that all these comments - which reflect a great deal of thought and analysis - will be seen as a constructive contribution to the process of formulating the new plans.
6. The objective - which I hope all who are fortunate enough to live in this region will share - is to ensure that the Local Development Plan, when it is drafted, is both pragmatic and imaginative. We would like to see a plan which reflects the views of the local residents, a plan which will take full account of the unique assets of the region, and a plan which will enhance the quality of life and the prospects for all who live, or may choose in future to live, in the Highlands.
5. I should be grateful for a formal acknowledgment of this message, to confirm that the comments have been received. In line with the suggestion made by Malcolm McLeod at a recent meeting, I will also be sending copies of the attached paper to Nairn's four elected local councillors.

Yours sincerely,

Brian Stewart
"Holmside"
33 Albert Street
Nairn IV12 4HF

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02/11/2009

Highland-wide Local Development Plan

Main Issues Report

Comments and Critique (BS, Sept/Oct 09)

SUMMARY

This critique offers some general observations on the report, and gives comments and responses – in the order set out in the report – on each of the 38 questions/options identified in the document.

The main points can be summarised as follows:

- The **vision** (of balanced, sustainable growth) is reasonable, but the policies and options outlined do not adequately reflect or deliver this vision;
- The assumptions about **population growth and housing-need** are questionable, and the planning should not be based solely on a high-growth/high-migration scenario which is likely to be unrealistic, undesirable, and unsustainable;
- The **spatial strategy** is inconsistent with the objective of balanced growth. The proposed concentration of expansion, growth and development in the Inverness/A96 corridor area is misconceived and undesirable, and the A96 Corridor Framework is not an acceptable or appropriate blueprint;
- The linkage between development and the provision of **infrastructure** should be direct and explicit, and solutions to major infrastructure issues (notably access/transport) should precede, not follow, new development;
- There is insufficient analysis of the **economic issues** (strategic priorities, resources, employment etc) which are fundamental to growth;
- In particular the report fails to address the significance of **tourism** as a driver of economic activity, a significant employer, and a sector uniquely dependent on the sensitive and sensible protection and management of the environment and natural assets of the Highlands;
- There are other major omissions. **Hydro-power** is scarcely mentioned as a priority source of renewable energy. The importance of **telecoms/IT**, crucial to modern business, is ignored. The future significance of **air services** and the airports is unexamined. Modal shift in **transport** is mentioned but no planning options are identified (other than park and ride) for better integration of existing road, rail, and air networks or the promotion of more efficient options (eg cycleways).
- There is no reference to the **interface with neighbouring regions**.

GENERAL OBSERVATIONS

1. The draft fails to identify, or offer answers to, many of the fundamental questions which need to be considered in drawing up a plan for the development of the Highlands over the next 20-40 years. For example:
2. **Economic Growth.** *What kind of economic growth is appropriate/desirable for the Highlands? (this needs to address consider inter alia the issues of capital-intensive/labour-intensive activities; energy availability/requirements; skilled vs unskilled; natural resource-requirements; markets and access; etc)?* The draft is near-silent on the strategic priorities for economic growth, and on, for example, the sectoral breakdown and balance (public/private, SMEs, etc – other than passing references to small rural businesses and the role of crofting). Unless this is squarely addressed, issues of population, housing, energy and resource-management cannot realistically be considered. Considerable attention is focused in the draft report on how to identify substantial amounts of land-for-housing, without clear indications of how this links to employment and economic activity.
3. **Population.** *Should the plan presume or encourage population growth, and if so why and where?* The draft is based on the assertion (unsupported by evidence and unexamined in analysis) that the population of the region needs to expand dramatically. It offers no clear vision of what all these additional people will actually do. The high growth, high-migration scenario is an aspiration that is neither justified nor supported by systematic analysis – and yet the housing needs and land-requirements are then based on this scenario. Both the population projections and the housing needs deserve critical scrutiny. At present, the figures for presumed growth simply do not add up. They bear little relation to nationally-endorsed GROS estimates. The aspirational figures for the A96 (Inverness-Nairn) corridor are unrealistic and unacceptable: if implemented, the proposed strategy will exacerbate the existing developmental imbalance within the region.
4. **Land-use priorities.** *How should a development plan for the region manage, or reconcile, the competing demands of - for example - nature/environment versus settlement/housing?* The draft plan appears to believe it is possible to have cake and eat it. The draft sets out ambitious goals for urban development and residential expansion. At the same time, it refers at length to the safeguarding and utilisation of existing natural assets and the environment (agriculture/crofting, fishing, tourism, recreation/amenities, and related service industries). There is no recognition of the potential conflict between these objectives; indeed there seems to be a presumption in favour of development (eg prime agricultural land can be developed “if essential... for settlement strategy or necessary to meet an established need”). This tension is illustrated by, and is most acute in, the case of the A96 corridor, where development proposals are concentrated in a coastal zone which is one of the most agriculturally-productive, environmentally-important, and tourism-focused parts of the region.
5. **Geographical balance.** *How should the plan balance centripetal population trends and the pressures for economies of scale in service delivery (eg large regional*

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hospitals), with the aim of promoting decentralisation and sustaining rural and subregional communities? The draft plan states as a given that the continued expansion of Inverness and its surrounding area is “essential... for the Highlands to prosper”. This deserves – but does not get - critical analysis. The emphasis on endorsing and incorporating the A96 Corridor Framework into the HwLDP implies adoption of a centralising approach, with construction, settlement, and growth concentrated in this area. This has already prompted public concern about “putting all the (developmental) eggs into one basket” to the detriment of the rest of the region. There is no reference to the risk of local/intra-regional migration (urban drift). The A96 Framework is fundamentally misconceived, based on questionable assumptions, will in the longer term exacerbate intra-region disparities, and risks undermining the objective of building sustainable communities and encouraging economic activity around the rest of the region.

6. **Infrastructure.** *What are the strategic needs and priorities?* There appears to be a presumption of housing-development first, and infrastructure afterwards. The draft refers the need to consider infrastructure needs as part of, or after, any development proposal. Other than a general desire to “improve” the transport network, there are few pointers (other than “developer contributions”) as to how this might be delivered. Air services and the role of airports scarcely get a mention. There is no evidence of a proactive strategy to shape the infrastructure (notably road and rail, but also water and energy networks) in a way which will influence the pattern of development across the region. There is a transport strategy for Inverness (only). There are map-symbols showing “Active Travel Masterplan locations” elsewhere, with no explanation of what these represent. The draft says little on water supply and drainage, and says nothing substantive about hydro-power (but plenty about windfarms and marine renewables!).

7. **Telecommunications.** *In particular, what are the communications options and future demands likely to be?* We live in the wired world of the 21st century. Yet the draft MIR is silent on telecomms/IT. In view of the pace of the “broadband revolution”, the government’s national IT objectives, and the radical effect this has on work patterns especially in rural areas (remote working, home working, etc), this ought to be a key element in the future development of the Highland economy.

8. **Integrated planning.** *How does the Highland region connect and relate to adjacent regions and the rest of the country?* There is some reference to southward transport links, but despite the mention of the strategic transport routes identified in the NPF2, the draft MIR seems to think the known world stops just beyond Auldearn and that there is neither need nor opportunity to look, or link, eastwards from the Highland region. A coherent development plan would identify common objectives and scope for coordination and integration with the neighbouring regions. This is particularly relevant in terms of the Moray Firth coast, and perhaps also the Lochaber/Argyll area. Similarly, the relationship between the plan for the Highlands, and the planning and development of the Cairngorm National Park (which overlaps with Highland region) is unclear.

Section 3: THE VISION FOR THE HIGHLANDS (pp 4-5 of MIR)

9. The Vision is expressed in very general terms and does not bring out clearly enough the two absolutely fundamental challenges for Highland planning:

(a) how to reconcile the competing and sometimes contradictory demands of protecting the unique character and quality of the region – which is largely a matter of protecting nature, safeguarding the environment, and minimising the impact of development – versus the aspirations and pressures for more settlement, more housing, and an expanding population.

(b) the risk that expansion of the Inverness region will accelerate the existing drift from, and decline of, much of the rest of the Highlands. There is a major challenge for planners in managing the centripetal trend of population movement of people and employment, while achieving the goal of sustainable rural communities.

10. The Vision (and see also The Spatial Strategy, Section 4) should thus be one of fostering balanced, decentralised and diverse development across the region. It should not aim to stimulate and facilitate the continued growth of Inverness and the so-called “A96 Corridor”, but rather to manage and possibly restrain such growth.

11. Our view is that the draft description – of “sustainable communities balancing population growth and economic development across the area...” is reasonable, but that the objectives and outcomes listed in Section 3 do not reflect this adequately. And while the draft sometimes mentions the means by which the council will seek to deliver the desired outcome, in other instances the draft gives no indication of how the council, or the plan, will help achieve the result intended. We identify a number of deficiencies/shortcomings in the draft.

Sustainable Highland Communities

12. We do not accept the assertion that a plan objective should be to *increase* the population of the Highlands. Rather we see it as the task of the plan (and the Council) to *manage and to influence the demographic structure to achieve a balance in terms of regional distribution and age range*. This may well require restraining population expansion (and housing) in some heavily built-up areas, and introducing incentives in others (eg to deter “drift” from the rural communities to already-developed centres).

13. We do not believe that the principal mechanism for ensuring sustainable communities is *the provision of market housing and affordable housing*. Building more housing does not in itself create sustainable economic activity. Nor is it the prerequisite for growth. Local authorities’ sustainability policies should focus on enabling appropriate economic activity. Essentially this means providing adequate infrastructure. If the context (communications, transport, energy and other resources and services) is attractive, enterprises will generate employment and attract people. Private developers will respond to the consequent demand for housing. The role of the Local Plan is then to *manage and control the delivery of housing*.

Safeguarding our environment

14. Particularly in view of the plan's recognition of the importance of the unique Highlands environment and its "wild places", we believe the effective management of renewable energy resources (first bullet point) should be linked to, and conditional upon, adequate measures for the protection and enhancement of the natural, built and cultural environment (second bullet point).

15. The effective management of renewable energy resources also requires some assessment of priorities as between the different potential sources. There is little sign of this in the draft plan. There is considerable coverage of wind power and marine renewables, both of which are modest sources dependent on subsidies and expensive new technology. By contrast, little attention is paid to hydro power, which is more efficient, less environmentally sensitive, and offers additional benefits (water supply and recreational amenity). We believe there should be much fuller analysis of, and a planning presumption in favour of, increasing hydro power capacity as the principal renewable energy source in the region.

16. The energy efficiency objective should indicate the main means by which the laudable objective of reducing CO2 and saving energy might be achieved (perhaps by adding at the end of this tired "*by incorporating more ambitious energy-efficiency requirements in design-criteria for development than are set out in current national guidelines*").

17. We recommend that the waste management objective should make clear that the strategy is aimed at processing only the waste produced within Highland region. Failure to specify this exposes the region to the risk that commercial operators, to achieve profitability from economies of scale, might seek to build greater capacity than is justified by purely local needs (resulting in the import of waste from elsewhere to process within the Highlands).

A Competitive, Sustainable and Adaptable Highland Economy

18. As noted above, we consider that the link between economic development and strategic infrastructure – and the Council's role in enabling the latter - should be explicit (ie delete "*whilst at the same time*" and insert "*by*").

19. As well as aiming for transport infrastructure improvements, and seeking to change travel behaviour, the plan should additionally include a commitment to ensure, through the planning process, that new development does not overload existing transport capacity.

20. Planning guidance on mineral, coastal, forestry etc development should stipulate the protection of key [environmental] resources in all circumstances, not just "*where appropriate*".

21. We believe that there should be an explicit reference to the vital role of tourism as a driver of economic activity, a significant employer, an increasing source

of revenue, and a sector that requires and is dependent on the sensitive and sustainable management of the unique natural assets of the Highlands.

A Healthier Highlands

22. The provision of open spaces/access is as much a duty of the public authority as an obligation on private developers. The Council itself should play a major role in implementing this. We recommend deletion of the words "*for the development of*".

Better opportunities/a fairer Highlands

23. We have no criticism of this objective. Resurrecting and improving deprived areas, and promoting a diversified economy, is a compelling argument against concentrating development in the A96 Corridor.

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Section 4: THE SPATIAL STRATEGY (pp 6-31 of MIR)

24. We agree that all parts of the Highlands are important for future development of the region, and that other towns and villages, and the wider countryside, are as important as the Inverness, Nairn, (A96 Corridor), Caithness, North Sutherland and Nigg locations.

- **For precisely that reason we reject the proposition that the continued growth and development of Inverness city and surrounding area is “essential” for the Highlands to prosper. We believe this is both simplistic and misconceived, and that the plan needs to ensure a suitable balance across the region.**

Inverness and the A96 Corridor (pages 7-11)

25. Some further growth is inevitable. But we would argue that such growth, unless carefully managed and constrained, will (a) exacerbate the social and economic disparities between this urbanising area and the rural remainder of the Highland region; (b) place further stress on already overloaded physical and social infrastructure like roads and medical services; (c) accelerate the tendency to population-drift from the rural north-west; and (d) result in the continuing gradual encroachment by urban development over the most fertile and productive agricultural land between Inverness and Nairn. In our view the task of the planning authority is not to “help” long-term population growth, but to manage it effectively.

- **We do not believe that the A96 Corridor Framework will do this satisfactorily (since it is predicated on an unacceptably large, and probably unrealistic, expansion in the population of the area). That Framework is therefore not a suitable or appropriate basis for future planning [detailed reasons set out below].**

26. The Highlands as a region is in fact more likely to prosper from a balanced development plan which encourages and sustains the growth of sub-regional centres based on appropriate types of economic activity (which are increasingly likely to be focused on leisure, tourism, and service-related sectors as much as capital- or labour-intensive industry or business). To quote an elected member of Highland Council, “We should not put all our [development] eggs into the one [A96 Corridor] basket”.

Inverness (page 7-8)

27. This section foreshadows the separate update of the “City Vision”. We have grave concerns that the ambition to develop and expand Inverness, as currently proposed, will have a seriously detrimental effect on the surrounding area in general, and will have a particularly damaging impact on the size, character and role of Nairn and the other smaller existing settlements in the vicinity.

28. The draft does not consider the core question for public consideration, which is “Should Inverness continue to grow, and if so how fast, where, and why?” There is a debate to be had about whether there is, or should be, any limit. We do not think the draft should assert that substantial population and housing growth at the rate of the recent past is necessary or desirable. The bottom line has to be sustainability.

29. The misleading notion that housing supports (and drives) economic growth appears again. Construction may offer short-term employment. But growth needs to be based on sustainable and relevant long-term employment opportunities. This means identifying not just where additional building might take place, but what kind of industry, business, and services might realistically and appropriately be encouraged (indeed incentivised) to locate in the area. At present there is a dangerous and vulnerable reliance on public sector employment (which is unlikely to grow at the rate seen in the recent past, and may indeed shrink) and retail services. Sustainable growth depends on a more imaginative and balanced economic strategy for the city. This needs to precede, or at least accompany, the architectural vision of what might be built where.

30. There is a chicken-and-egg debate about whether the major infrastructure (river crossings, link road) should precede or follow the further development already planned. The natural tendency is for development, like water, to flow along the paths of least resistance and fewest obstacles. Hence the massive recent expansion south-east and east, and the slow progress on Ness-side and Charleston. All the evidence thus far suggests that planners have acquiesced in this and acceded to developer pressure to build (for commercial reasons) in areas where transport and other infrastructure is less of a bottleneck. We believe any revised vision for the city ought to offer a more robust strategy for countering this tendency and addressing the provision of adequate infrastructure as a prerequisite of development.

31. Another key and specific issue (not identified in the draft) is the extent to which the focus on the Beechwood campus idea, the expansion of “east Inverness”, and the aspiration to “*open up development opportunities...to the east*” will reinforce the shift already initiated by the existing (Tesco etc) Retail Park which has led to the near-atrophy of the historic town centre and shopping zone. We believe that the regeneration of the heart of the city and the riverside/harbour zone should be given far higher priority than the eastward expansion

Q.1. We believe the Preferred Option is inadequate as it focuses almost entirely on the narrow issue of identifying more sites for development; and we regard its presumptions about the A96 Corridor as unacceptable.

We are equally strongly opposed to the alternative suggested here of “*opening up [development] opportunities in the A96 Corridor instead of consolidating and developing the existing areas identified within the city*”. This ducks the issue, leaves Inverness city with no clear agenda, and is effectively following a ‘line of least resistance’.

On the other hand we support the alternative option (put forward under the A96 Corridor Framework section) of “*widening the search for long term expansion to the rest of the Inner Moray Firth*”. This would be consistent with the aim of delivering more diverse and balanced development across the region.

The A96 Corridor (pages 10-11)

32. Insofar as a strategy for this part of the region is required, it should not be presented, and cannot be justified, simply as an adjunct to an Inverness City Vision. Nor is it an appropriate response to the misguided aspiration or expectation that Inverness city has to grow on the scale envisaged in the draft A96 Framework. A commuter-conurbation is not an attractive or acceptable prospect for this unique area. We therefore do not support the Preferred Option. In summary, our objections are as follows:

- **Site-identification.** The Plan cannot simply “identify” (which implies validating) the development sites set out in the A96 Framework. That Framework is misconceived. It needs review and re-evaluation.
- **Infrastructure.** Given the key importance of integrating development and infrastructure, commitments “in principle” on the latter are insufficient. The HwLDP certainly should not permit development to proceed before essential infrastructure upgrades are put in place.
- **Amount of development.** If there is indeed to be a re-examination of the Framework, it follows that any indication in the HwLDP of the amount or density of permissible development would have to be provisional pending such a review.
- **Linkage with work in Inverness.** One of the methodological deficiencies of the Framework is that it is driven more by the aspirations of Inverness city than by the intrinsic local development needs and priorities of the towns and communities of the so-called “Corridor”. So while it is reasonable to take account of progress in Inverness, there is no *prima facie* need for an explicit link.
- **Development and housing capacity in other centres should not be linked to, still less conditional on, progress with development within Inverness.** The development of Nairn should reflect the needs of the town as an established settlement with its own hinterland and socio-economic catchment area (which incidentally extends into Moray). It should not be contingent on the rate of expansion of Inverness.

33. It is unsurprising that there is developer pressure on this A96 area, since this area offers the fewest physical constraints and the most lucrative opportunities. Neither is a reason to designate the area as the principal venue for future urban development. Any proposals for development in this area should (a) be justified in their own terms, not as a response to the perceived needs of Inverness; (b) recognise and reinforce the identity and function of existing settlements which are integrated with, and serve, their own hinterland, and (c) recognise that the A96 does not end at Auldearn. If there is a “corridor”, it goes to Aberdeen.

34. It follows that the starting point for any assessment of development in this so-called Corridor should be the future organic economic and population growth requirements of the existing towns and villages, and the equally important obligation to safeguard the agricultural character, natural environment, historic sites and visual

appeal of the area. The purpose of any development should be to enhance these characteristics. If sensitively done, this could well contribute to the overall improvement and prosperity of the region. But to regard this area as primarily a development opportunity which needs to deliver a dramatically increased volume and density of residential housing and commercial/business zones, is to fundamentally misunderstand the purpose of development. Such an approach risks resulting in the worst kind of urban sprawl and ribbon development.

Corridor-wide issues (page 11)

35. A substantial number of questions have arisen about the A96 Framework: not only the specific underlying assumptions (notably in terms of the population-growth aspirations/assertions), but also the inadequacy of the consultation over the draft, the non-statutory basis of the Framework, and the doubts about the overall strategic rationale for its proposals.

- **We believe that, against this background, the Main Issues Report, and the HwLDP, should re-examine the fundamentals of the approach outlined in that A96 Framework. Even if the framework was believed to have been justifiable when originally conceived almost a decade ago, it no longer stands up to scrutiny. At the very least the MIR should recognise that the questions about the Framework mean that the Council cannot presume its validity and thus incorporate it into the HwLDP.**

36. Similarly, questions have been raised about the methodology and validity of the Housing Needs Assessment projections – specifically in terms of the “high-migration” assumption, and over possible double-counting in the social/affordable housing demand figures. Consequently it cannot reasonably be assumed that there is a level of demand which would justify the ambitious targets set out in the A96 Framework (which the document itself acknowledges are based on aspiration, not analysis). The various population growth rates and figures cited are inconsistent, and the analysis flawed [details available separately].

Phasing of development (pages 12-13)

37. The draft MIR rightly flags up the criticality for the future development of this area of the various transport infrastructure requirements (dualling, the Nairn bypass, the A9/A96 link) and the other issues of drainage, waste treatment capacity and water supply. There is already ample empirical evidence that the A96 transit through Nairn, and the capacity of the waste-treatment facilities, to cite just two examples, are overloaded even before any of the new developments envisaged.

Q.2. Against this background we find it inexplicable, and unacceptable, that the “Preferred Option” should propose the “support [of] early phases of development across the Corridor before major infrastructure is completed but subject to commitments in principle....etc”. Our view is that the sensible and indeed necessary approach is to ensure that the delivery of

essential upgrading to key infrastructure is a prerequisite of (or at the very least proceeds in tandem with and determines the pace of) new development. Commitments in principle are of no practical or operational value. There needs to be robust conditionality. Without that, the risk once again (and there are plenty of existing examples to learn from) is that private developers will proceed with construction and that the anticipated infrastructure – even where commitments in principle exist – will not materialise.

Alternative Options (pages 13-14)

38. The first alternative option advocates, in effect, a slower, more gradual approach in this A96 ‘corridor’, making development more directly conditional on the upgrading of infrastructure.

Q.2 (continued). We see merit in this first alternative option. It is a more rational approach, which would prevent the risk of local infrastructure being over-stressed. In the economic and investment circumstances of the next decade or so, a more gradual pace may be appropriate. And we believe the consequences would not be as negative as the draft suggests. The implication that incremental (uncoordinated) development will ensue, with detrimental effects on the environment, is unnecessary flesh-creeping. There is no reason why selective development cannot proceed within a firmly managed strategic plan on which the planners retain an overview. Pressure to develop green space is ever-present. Sensible planning provides a basis to deal with that. To put it simply, given the choice between doing it quick, or doing it right, the sensible course is to do it right.

39. The second alternative option (looking at the rest of the Inner Moray Firth region) is not in fact an alternative, but should be a complementary and necessary part of a sensible strategy for regional development, and should have higher priority than the so-called A96 Corridor.

Q.2 (continued). We therefore support and encourage this second alternative option. It would be consistent with the objective of devolved, dispersed and balanced growth across the region as a whole. The figures show, and the draft states, that not only is there sufficient land in these other areas for local needs, but that there is capacity to accommodate a higher level of growth. This would therefore be a logical route to explore, if only to relieve the pressures and shortage of developable land that is already identified in the city and much of the so-called A96 Corridor.

40. Incidentally it is interesting, and significant, that this option recognises the need to assess “*the capacity of these [Easter Ross] communities and the transport networks to accommodate further significant growth...*” – when it is exactly that same capacity issue that looms large, and has not been adequately addressed, in the A96 Framework and its development plans for Nairn.

Developer Contributions in the A96 Corridor (page 15)

41. This appears to suggest that a special and different set of rules be applied to developments in the so-called A96 Corridor. The principle of developer contributions to infrastructure is well-established and should not [need not] be based on an endorsement of the A96 Corridor Framework. Any and all developments, whether in the vicinity of the A96 or elsewhere, should be susceptible to a developer contributions protocol.

42. No reason has been adduced as to why the developer contributions protocol, or policy, should be tied explicitly, or only, to the A96 Corridor Framework. A set of principles applicable Highland-wide could be elaborated and applied consistently, across the board. This would be fairer both to developers and to the communities within the region.

Q.3. We have a particular concern about the application of a protocol within a zonal Framework such as the A96 Corridor. It would be unacceptable for a contribution generated in one part of the area (say a housing development in Nairn) to be utilised, even if only for timing-convenience, to fund infrastructure elsewhere (say the East Inverness Link road, or dualling of the A96 to the airport).

We therefore regard the alternative option as preferable. Case by case consideration does not necessarily lead to inconsistency if the principles are established, agreed, and applied.

Area Specific issues: East Inverness (page 16-18)

43. See earlier comments about the potential consequences for the city centre of a continued emphasis on new development and expansion of east Inverness. While it is reasonable to identify sites and priorities within the East Inverness area, the HwLDP should also establish what priority East Inverness has in relation to the other areas of the city including both the centre/riverside and the Longman/harbour zone .

Q.4. As with the options for the so-called A96 Corridor, we believe that supporting development with no more than a commitment in principle on infrastructure is a weak and unsatisfactory basis on which to approach such ambitious new development. Significant new infrastructure is integral to the plans for East Inverness. There is no rationale for putting the cart before the horse.

The alternative option (identify the sites for development up to 2016) seems to duck the central issue. If major new developments are planned, the approach should be holistic and coherent. It is incidentally not clear how this option would be environmentally beneficial (unless this simply means less building!)

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Area Specific issues: Nairn (page 18-20)

44. One of the principal conceptual deficiencies in the A96 Corridor Framework is that it treats the development of Nairn almost entirely as ancillary to the vision of a larger Inverness city region, and looks at Nairn essentially as the eastern “terminus” of the so-called A96 Corridor. It makes assumptions and projections, notably on population growth and housing need, which do not arise from an analysis of the future of Nairn as an urban centre in its own right.

Q.5. We consider – for the reasons explained in detail below – that the Preferred Option is a curate’s egg. The recognition of the importance of a bypass is welcome, as is the commitment to consult on the mix of development. But in many other respects the Preferred Option is unsatisfactory.

45. The Framework fails to offer any kind of vision for the function of Nairn as either a service centre for its rural hinterland or for its role as a tourist centre and amenity site for the region and indeed for a wider market. The principal recommendation of that Framework is for extensive new high-density residential estates with modest local shopping provision. This will simply turn a once thriving regional tourist town into a dormitory suburb.

46. The Framework perversely suggests that the town’s “response to the landward traditions of the town” should be to build a large housing development on agricultural land at Nairn South; and that it should “respond to the seaward context” by building extensive housing on land at Nairn West! Such propositions betray a dearth of imagination – as well as being sheer sophistry.

47. The failure to acknowledge that the A96 goes beyond Auldearn, and the apparent belief that there is neither need nor opportunity to look, or link, eastwards from the Highland region, is another fundamental flaw in the Framework which has particular implications for Nairn, a town which historically and currently connects eastwards and southwards as well as towards Inverness.

- **Consequently we consider it unacceptable to take the interim and non-statutory A96 Framework as a “given” for consideration of any aspect of the development of Nairn, and certainly not as justification, or validation, of the quoted expansion – indeed a doubling – of Nairn’s population. As noted above, such a proposal for expansion raises crucial questions – not analysed in the draft – about absorptive capacity. And the Council’s own figures do not offer a credible or rational case for the scale of expansion that the Framework indicates.**

48. The areas where infrastructure improvements are required are already clearly known. The case for a Nairn bypass is unassailable and has been well-rehearsed. The challenge in the plan is to do more than identify how development proposals “fit with” the bypass proposals, and to establish clear causal connections and consequences. The critical question is timing, and how this is integrated with other aspects of the town’s development. The clear implication is that a bypass is unlikely

for some (many?) years. While action to sustain and improve the town clearly cannot be held hostage to the delivery of a bypass, it is equally clear that significant and large scale new developments (particularly residential build which will further increase the burden on existing roads) cannot proceed unrestrained in the absence of committed funding and a firm timetable for a bypass.

49. Thus a key issue for Nairn is prioritisation, or sequencing, of the various possible proposals for the town over the coming decades.

- **We think it right that all local development – not just the “longer term proposals” (whatever they may be - there is no definition in the paper) should take into account the traffic/bypass dimension, and should contribute to the delivery of a bypass.**

- **There should be clear linkage between development and infrastructure – ie solutions have to be found on road capacity and the provision of services such as waste-treatment before, or as an integral part of, future development.**

50. There can be no dispute over the stated objective of “*working with the community and developers ...on a realistic phasing of development.*” But such collaboration should not just consider phasing, but also the form, content and purpose of the developments proposed.

51. Aside from the general point about the inadequacy of the Framework approach to Nairn’s development, we have other specific concerns:

- **We are not satisfied as to the validity of the housing-needs projections on which the development outcomes are predicated. A doubling of the population is grossly out of line with past and present trends and neither realistic nor desirable for the future period of the Plan.**

- **Likewise there appears to be no evidential underpinning for the postulated employment figure of 5,000 jobs. A credible planning framework needs to offer a specific, and realistic, analysis of the source and nature of these jobs. We do not believe that construction of almost 5000 residential units with some retail space will in itself create 5000 sustainable jobs.**

- **We regard the absence of a specific reference to tourism – the principal *raison d’etre* of Nairn – as a surprising omission both in this section and in the preambular “Vision” section. It merits only a fleeting mention in the section on “Development of Local Centres”. Tourism is a substantial contributor to the economy of the Highlands. But by the same token tourism is very sensitive to changes which affect the environment, the recreational opportunities, the accessibility and the visual attractiveness of the Highlands. Urban (especially residential) development, and the adequacy of infrastructure, have a major effect on the tourism offering. Tourism should therefore feature prominently in any assessment of development options for Nairn, and in the regional plan.**

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52. The alternative option (to base development on the sites in the existing Local Plan) is inadequate as a response to the changing, and increasingly serious, challenges that Nairn faces in terms of making the town “fit for purpose”.

53. Housing is not the litmus test for a town’s development. A credible long-term plan needs to do more than identify potential land for building. Nairn needs a development plan which is not centred on a massive expansion of new residential housing, but on organic growth and the use of planning powers to promote a regeneration of the town centre.

Q.5 (continued). We believe a sensible alternative option for the development of Nairn should be based on new strategic thinking on the long-term role of the town.

Development in Nairn should enhance the town’s functions as a local urban centre with a diversity of retail facilities, adequate social services, and accommodation and amenities for tourist visitors as well as residents.

Such a plan must address the existing regeneration agenda, improve the viability of local enterprises, identify employment opportunities, and sustain a diversity of local economic activity.

Tornagrain (page 20-21)

54. There are still differing views as to whether the case for a new settlement at Tornagrain has been convincingly made. It has been proposed on the basis of the same ambitious assertions about “needed” or “expected” population growth which underpin the A96 Framework. Changing macroeconomic conditions must call in question some of the more optimistic assumptions about economic growth and the consequent prospects for new employment and demand for housing. Even if the new HwLDP endorses the principle of a new settlement, there has to be some reassessment of the timescale for delivery.

55. If it does proceed, significant issues remain to be addressed about the suitability of the design principles which are to be applied, and the extent to which the new centre will become viable in terms of local services and employment in a location so close to Inverness. The risk is that it will become another ‘satellite dormitory’ with insufficient economic ‘weight’ – despite the proximity of the airport – to sustain the autonomy the designers envisage.

Q.6. The Preferred Option is unexceptionable if the development is to proceed.

There are two obvious alternatives. One is to consider a more specifically business-based zone in the immediate vicinity of the Airport. The other is to support limited, organic growth of the small existing villages in the area, such as Croy and Ardersier.

Smaller settlements in the A96 Corridor (page 22)

56. The conceptual shortcomings of the A96 Framework mentioned in connection with planning for Nairn apply also to these other settlements. In fact the Framework contains very little functional analysis and planning guidance on the mid to long term development of these villages, other than to presume some (housing) expansion. There is clearly considerable discussion/consultation still to be had on this topic.

Q.7. We favour appropriate development of these settlements, but do not support the Preferred Option as drafted. The A96 Framework is not the best or only basis for action. We propose deletion of “as set out in the A96 Framework” from the first bullet point.

Caithness and North Sutherland [and]
Easter Ross and Nigg (pages 23-27)

57. No specific comments beyond those already noted above.

Q.9. and Q.10. No comment

Development of Local Centres (pages 28-29)

58. Despite the initial sentence of this section (top of page 28) the cursory coverage of this subject – half a dozen paragraphs, compared to sixteen pages for Inverness and the A96 Corridor – reveals the fundamental imbalance of this entire draft. The text pays lip service to the importance of the smaller towns as local and sub-regional centres, but offers little substance to back this up.

59. Specifically, if Dingwall, for example is designated a “sub-regional centre”, then Nairn, second-largest town in the region, with much more substantial and diverse functions, and about the same distance Inverness should certainly not be classified lower in the hierarchy as a “local centre”. Nairn’s place in the hierarchy needs to take account of its role not just as seen from Inverness, but also as the service centre for a hinterland that extends east of Auldearn and covers the whole of Nairnshire.

Q.11. We agree with the first and second bullet points of the Preferred Option, but consider Nairn should rank as a sub-regional centre for the reasons explained above. We believe (third bullet point) that the issue of housing – excess or shortage – should be addressed on the basis of robust analysis, and that the presumption should be to promote organic growth and regionally-balanced expansion.

In reality, this means that the option for development of local centres has to be part of the spatial strategy and thus linked to that alternative option for Inverness and the Inner Moray Firth which delivers dispersed and balanced growth rather than a concentration in the A96 Corridor [see the response to Q.2 above]

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Wider Countryside and Fragile Areas

60. The aim should be to prevent, not just reduce, the impact of new development on the countryside. There need to be clear criteria for judging what is "appropriate" development. We favour measures which will sustain population, services and economic activity in already-settled but so-called "fragile" areas, but these need to be more clearly identified.

Q. 11. We agree the need for a consistent approach. This needs to be linked to the objectives of relieving pressure in the most developed area (the Inner Moray Firth) achieving balanced growth region-wide, and respecting the aims of decentralisation, dispersal, and region-wide balance.

The Strategy Map (page 31)

61. This illustrates graphically the nature of the development challenge, and the perversity of concentrating future development in precisely the areas where pressure on land and infrastructure is already greatest. Not only is this bad planning, it is economically unwise and geographically and politically inequitable. There is sense in reviving or redeveloping previously-used land (Whiteness, Nigg etc). But there is no rational justification for concentrating the bulk of further "key" development or the bulk of new housing in this corner of the Moray Firth. And it is ironic that the "employment deficit" area is not seen as a key development location! The regional development plan should respond to the picture presented by that map.

Section 5: POLICY OPTIONS (pages 32-73 of MIR)

Sustainable Highland Communities (pages 32-43)

Population and Housing (pages 32-35)

62. Population change. The whole of the HwLDP is constructed on the basis of assumptions about population. Yet the growth projections offered are statistically questionable and lacking in evidential detail. The fact that "*recent growth has exceeded previous estimates*" is not an acceptable reason for presuming that such a growth rate will continue. As bankers are obliged to state: past performance is no guide to the future, and you may get less than you expect! Demography (the ageing of the postwar generation bulge) and changing macroeconomic circumstances and migration trends (neither of which are examined) could also significantly affect the growth rate.

63. Even on the basis of the sketchy figures provided, the difference between the low and high scenarios – taken over a 20-40 year timeframe – is dramatic. The crucial point is that the draft offers no analysis which supports the adoption of the high-growth scenario as the baseline for development planning. The fact that the Scottish Government has the aspiration [sic] for growth to 500,000 is not in itself a reason to suppose that this will happen.

- **We do not accept that the high-migration scenario is the appropriate basis on which to plan.**

64. That said, if the studies and projections indicate (as is plausible) a potentially higher rate of growth in the INBS subregion and further falls in Caithness & Sutherland, then a reasonable development plan would – in line with the stated objective of "*balanced development across the region*" (page 4) – put forward measures to stimulate growth and housing in the latter, and limit/restrain further housing development in the INBS area. To concentrate the bulk of further expansion in the already intensively-developed INBS/A96 area is neither logical, nor sound planning.

- **We would argue that – to ensure a balance across the region – development planning should aim to sustain the communities and attract populations (eg by encouraging housing) in those areas where a decline is projected, and limit expansion in those areas where an increase would otherwise be more likely.**

65. Household change. It is reasonable to take account of changing social trends affecting how people live. This does not only imply smaller numbers per household, but also changing expectations: Both ageing populations and younger families seek individual, independent housing units in an environment that offers quality of life. People no longer regard high-density apartment blocks with communal grounds and limited private space as acceptable. Development plans have to recognise this in setting the parameters for both the numbers and density of housing developments.

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66. Housing needs and demand. The HNDA and related supporting documents are internally inconsistent and do not validate the assertions contained in the Main Issues report [the NRCG has produced a separate analysis which casts doubt on many of the figures and on some of the underlying assumptions].

67. Housing land requirement and supply. If the assumptions about population growth are unsubstantiated, then the suggested requirement for housing-land immediately becomes suspect. At the very least, if there are three growth-projections (high, principal, and low) there should be equivalent requirement figures for each. This may reveal that there is in fact no – or very little – deficit in any other than the high-migration scenario.

- **We do not accept that the requirements set out in the table (p34) are realistic, and believe that forward planning should be on a contingency basis for a range of possible growth scenarios, not simply the “maximalist” one.**

68. As already indicated, if there is a projected excess of demand for land over supply (as in eg the Inverness-Nairn areas) then the choice is either to increase supply, or to seek to reduce/influence demand. The same principle applies, *mutatis mutandis*, to those areas (eg Caithness, Lochaber, and parts of the West) where land supply exceeds demand.

69. In areas where there is “*an adequacy of effective land*” (top of p 35) but the infrastructure needs upgrading, it is both lazy planning and a failure of initiative simply to designate still more additional land for housing. The sensible strategy is to create incentives for the required investment in the infrastructure of that land which is already available.

- **We do not accept that “a generous identification of housing land across the Highlands” (p 35) is either positive or necessary. A sensible plan would seek both to relate land-provision to actual demand (in order to deter speculative building) and to adopt a proactive policy to the designation of housing land within the region in order to influence the pattern of growth and settlement to achieve a more equitable and balanced distribution.**

Q.12. We do not agree with the Preferred Option, for the reasons set out above. We support the development of a policy which reflects a more realistic assessment of likely population growth; which provides for a range of possible scenarios (and can be adapted accordingly in the light of emerging evidence on trends); which takes account of demographic change as well as in-migration; and which actively seeks to achieve a better balance of population distribution across the region by encouraging settlement in areas with available land and declining populations, and restricting building in areas where land is scarce and development already substantial.

Housing in the Countryside (page 36-37)

70. There is some confused thinking as between what is “hinterland” and what is “countryside”. The draft recognises that there is commuter-pressure in the hinterlands marked on the map of the Inner Moray Firth area, around Fort William, and around Wick and Thurso. It then proposes supporting development of more housing *“in the countryside within these areas of pressure... whilst ensuring that these developments do not take away from the quality of these countryside areas”*. This is wishful thinking, as the two aims are potentially incompatible.

71. There needs to be a clear strategic approach, which determines how much additional commuter-settlement in the pressured hinterlands is acceptable, and what criteria are to be applied to ensure the safeguarding of the quality of both the immediate hinterland and the wider countryside. There is a paradox here which is a perennial challenge to planning: if lots of people want to live in an area because of its perceived qualities, then building more housing is likely to destroy precisely those qualities which make it attractive to so many people.

Q.13. We do not agree with the Preferred Option. It does not address the core question of how to manage housing-development in (a) the hinterland areas and (b) the wider countryside. It is not a matter of more or less restrictive policies, but a matter of qualitatively different approaches. But in both there should be a clear presumption that protection of the quality and character of the existing (rural) environment is a higher priority than the provision of additional housing. In the commuter-hinterland, development has to be permitted subject to clear criteria on infrastructure and absorptive capacity. In the wider countryside, development should be determined largely by the recognised strategic objectives of regeneration, sustaining communities, reversing decline, and stimulating appropriate economic activity (which in the country areas is likely to be agriculture or tourism-related rather than urban and capital/labour intensive).

Affordable Housing (pages 38-39)

72. We are not persuaded that an obligatory quota of “affordable housing” is desirable, even though it is currently national policy. As a concept, it has not demonstrably delivered what it purports to offer. It distorts the pattern of supply and demand; it does not foster social mobility; and in a sensible and integrated regional economic and social development plan, it should not be necessary. However, we consider the current draft on the basis that this policy will remain.

73. The term “affordable housing” is nowhere precisely defined. And given the unreliability and questionable analysis of the HNDA, it cannot be assumed that the need for affordable housing is as stated. Again, there needs to be modelling for all three scenarios, not simply the highest one.

74. There is no explanation of the statement, *“...There needs to be a consistent approach to this [the % of affordable housing] throughout Highland”*. Why? Logic

suggests that if affordable housing has to be built, it should (a) be built where there is clearly identified need/demand, rather than in every development in every location; and (b) the 'affordability' should be calibrated in relation to local levels of income. What is affordable in Inverness may not be affordable in Lochaber, or vice versa.

75. This new plan provides the opportunity for some radical thinking on how to respond to the presumed demand for "affordable housing". Given the readiness to consider concepts such as Poundbury, there is a case for looking at the Port Sunlight or Bournville models – or even revisiting the notion of new towns specifically designed to deliver affordable houses in those areas where there is demand, or where there is a case in planning terms (ie regeneration) to provide such housing.

76. Rather than a new town at Tornagrain, and lots more affordable housing in and around Inverness on the 25% formula, why not plan an 'affordable' new town in the NW Highlands? If in-migration occurs at the level envisaged, and the demand is as high as is suggested, then such an initiative would prove viable, and would deliver on regeneration objectives too. If no developers respond, this would be practical proof that the basic assumptions in the plan are unrealistic.

Q.14. We do not agree with the Preferred Option. In essence it amounts to a blank cheque ("we propose to set the affordable-housing requirement and threshold in line with whatever figures we put into the HNDA"). It foresees possible increases – but not decreases - in the % of affordable housing "where this is justified by local needs", without any indication of how these needs might be defined or evaluated.

We believe the first alternative option (maintain the status quo) though not ideal is preferable, because it at least offers a clear formula understandable to both the public and developers. And the fear of "serious shortages" may be unfounded if the high-growth scenario proves fallacious or unwarranted. There is no merit in having an excess of affordable housing.

We oppose the second alternative option (a threshold of 4 throughout Highland). This is both unnecessary and of little practical usefulness – as the draft acknowledges.

Planning for an Ageing Population (pages 39-40)

77. It is reasonable to assume that the age profile of the region's population will shift, and that there will be more older people. This requires two strands of planning. One is the provision of adequate healthcare capacity (primarily an NHS issue). The other is a housing issue. It is broadly true that healthcare needs increase with age, and therefore right to plan housing that is suitable for older people with mobility problems and care needs. But it is also true that older people are generally fitter and more active than in the past. So the housing strategy needs to take account of the healthy and affluent independent elderly, as well as the care-dependent. Adapting existing housing stock may be a better and more cost-effective approach than new build. There should be provision for both. In terms of future development, "retirement villages" and designated developments (cf Firhall in Nairn) are just as important as sheltered housing and care homes, and the development plan should explicitly recognise this.

Q.15. We agree in general with the Preferred Option, but believe it should also include elements of the alternative options (encouraging market forces to deliver a variety of housing options, including developments specifically targeted at the older generation).

Gypsies/Travellers (page 41)

78. The plan should include some indication of the scale, numbers and location(s) of the gypsy/traveller population. Without basic data, sensible planning is not possible.

Q.16. We endorse the Preferred Option. It is right to evaluate the particular needs/expectations of this group. But it does not follow that they must automatically all be met. Part of the social contract of living in a wider community is that particular groups such as gypsies/travellers must accept responsibilities and obligations to that wider community, as well as an entitlement to the protection of their rights. Thus it is of central importance to balance their needs against the reasonable expectations of other communities. For this reason the criteria/tests for provision of special facilities will be critical, and the impact-assessments an essential element of planning.

We are sceptical of the alternative of a case-by-case approach. This could easily turn into a pass-the-parcel exercise, with consequent risks both of unauthorised sites and local friction.

Retailing (page 42)

79. We endorse the two key points in the narrative: that town centres should be the focus for mixed-use, with retailing as a principal and core element; and that where new developments are planned, the provision of (new) local retail facilities, and the integration of this with existing retail provision, should be an early and obligatory requirement.

80. We are however sceptical about the notion of incorporating into apartment buildings, ground-floor "units" for retail which could also be converted into flats. The result is neither fish nor fowl: retail units that are not viable because of the surroundings, and flats that are not purpose-designed. The example of Nairn Harbourside is a cautionary illustration of the failure of this idea.

81. The draft identifies the concerns over the impact of out-of-centre retail developments, but fails to address possible mechanisms, within the planning framework, to address this. Key among these are access and parking (ie the impact of free parking at retail centres, versus the congestion and pay-parking in town centres). Other policy options – such as differential business rates for town-centre and town-edge retailers – could also be used as planning levers.

Q.17. We agree with the Preferred Option in general. But we would support the inclusion of additional criteria aimed at ensuring diversity and choice. This is not just small retailers v large stores, but also an explicit policy to counter the emergence of local quasi-monopolies (eg Tesco in Inverness, the Co-op in Nairn).

In addition, assessment of out-of-town proposals (third bullet-point in the Preferred Option) should take account not just of the impact on the local town centre, but also the effect on the wider pattern of shopping in the area (this wording should therefore be inserted). To cite a good current example, consideration of the Sainsbury's proposal in Nairn needs to take account not just of the impact on Nairn town-centre, but also on the pattern of shopping trips to Forres and Inverness.

Developer Contributions (page 43)

82. We endorse the view that "*developer contributions should be sought for all development that has off-site impacts.*" We also believe that there should be a clear and consistent formula applicable across the entire region, both to give clarity to developers, and to avoid any suspicion of collusion, or separately-negotiated "deals" between Council and developer, in individual cases.

83. We do not agree that developers should be able to haggle a reduction (third para on page 43). This directly contradicts the principle of a consistent, region-wide, policy. If a development becomes "uneconomic" when a developer-contribution to related services is required, then that development should not go ahead. No developer should have a free ride to profit while others (or public/taxpayer funds) bear the cost of the improvements in infrastructure which that development necessitates.

Q.18. We agree with the Preferred Option, and for the avoidance of doubt we suggest inserting after "developer contributions" the words "on the basis of a consistent region-wide formula, in all cases where....etc"

We do not support the alternative (case-by case) approach.

Safeguarding Our Environment (pages 44-48)

Natural, Built and Cultural Heritage (pages 44-45)

84. The natural, built and cultural heritage of the Highlands is arguably THE single most important attribute of the region. In a country where urban growth, industrial development and even large-scale agriculture are changing and obscuring the character and quality of regional and local environments, the Highlands has a unique set of assets which define the region. It should be a primary and overriding objective of the Highland-wide LDP to protect, preserve and enhance this environment in all circumstances – without the weasel-worded caveat of "*where possible*" (top of p 44), which provides an unacceptably large loophole.

85. Against that background, the Preferred Option is pathetically weak. *“Mapping known features... and protecting them ”* (what are they) , and *“providing a link to the relevant legislation”* (what does that mean?) is a wholly inadequate response to the task. And *“asking developers to address all species and habitats issues...etc”* is like asking the fox to guard the hen-house.

86. A proper strategy for safeguarding the environment and natural heritage has to start from the premise that this natural environment is an integrated whole (the word holistic is absolutely relevant in this context). It is thus not sufficient to designate and protect individual sites – the national legislation does that anyway. The task of the development plan is to set out guidelines which ensure the preservation of the overall quality of the natural environment and the cultural heritage within it. This involves putting a qualitative value on views, scenery, and wildness, and recognising the importance of landscape and historical traces and artefacts.

Q.19. We do not agree with either the Preferred Option or the alternative. Neither adequately addresses the requirement. The Development Plan should propose a set of principles which stipulate that any development must minimise its impact on the surrounding environment, and which gives the planning authorities, the specialised agencies, and the public and its representatives (not the developers) the principal role in determining how this is to be done.

Previously Used Land (page 46)

87. We agree that it makes sense to redevelop derelict land. The policy could be strengthened by requiring developers and planners to build on available brownfield land within a given locality before approving new development on green-field sites.

Q.20. We agree the Preferred Option, and suggest it be strengthened as above.

Wild land (page 47)

88. See comments in para 23 above. The rarity of such wild areas makes it essential that they be protected. This does not only refer to land areas, nor just to housing. As recent cases have illustrated, wild places are under threat also from windfarms (eg Dava Moor) and giant pylons (West Highlands and elsewhere). Coasts, beaches and marine environments are equally deserving of protection for the same reason.

Q.21. We agree the Preferred Option, and recommend that the policy should apply to coastal/marine as well as land areas, and should set out the specific criteria that will be used in assessing applications. Mitigation measures (in any development that is approved) will need to be clear, and mandatory.

Water Environment (page 48)

89. We endorse the thinking that water-related issues should be a consideration in making all planning decisions, whether housing or other projects. Since SEPA is an expert body, and statutory consultee, it is not clear why the HwLDP should incorporate a policy on this. If this were to remove the obligation to consult SEPA, it would not be acceptable. And it raises the question of whether the HwLDP policy (whatever it may be) would be regarded as having greater force than the independent views and advice of SEPA.

Q.22. We are not wholly persuaded by the Preferred Option. It is only acceptable if it recognises that SEPA would still have to be consulted on all applications (as the alternative option suggests); and that SEPA advice on any specific proposal would override any general statement of policy in the HwLDP.

Sustainable Development and Climate Change (pages 49-57)

90. There are two major and startling omissions from this section. One is hydro power, under the 'renewables' heading. The other is energy-efficiency: this is not just an element in new house-design, but should be an integral part of a coherent policy embracing all aspects of energy use from CHP possibilities and micro-generation to, for example, traffic-management measures to save fuel and reduce pollution. No point in building lots of energy-efficient new houses if this results in more massive traffic-jams!

Renewable energy (pages 49-52)

91. Of the three pages on energy, two are devoted to wind and marine. Although hydro-electric power (HEP) generation is mentioned in passing, there is no comparable forward plan, policy or framework for hydro power. Yet the Highlands is the ideal region in which to further expand hydro capacity.

92. HEP is a proven renewable technology. It is significantly more efficient, productive and reliable than other new and experimental technologies such as wind and wave power. Unlike them, it does not depend on weather. Unlike them, it is capable of responding to demand fluctuation and demand peaks. Unlike them, it offers additional planning, environmental and recreational benefits (eg water supply, fishing, diversity of natural habitat). The HwLDP should identify the potential additional capacity, and locations, for hydro development, and should treat this as a higher priority – because less-intrusive and more environmentally-friendly – than wind or wave power.

93. There is no quantified analysis of the likely contribution that either of the sources described (wind and marine) might make, nor any indications of cost/benefit. And where is the reference to solar power – now increasingly viable in small scale

residential developments and in public buildings? There needs to be a comparative evaluation of the potential and the effectiveness of all the renewable sources, as essential underpinning to the strategies that are to be developed. Targets alone are not enough.

94. A serious plan to address sustainability in energy use has to address consumption as well as production. As well as targets for energy development, there should be proposals (and possibly incentives?) for reducing consumption.

Q.23. The Preferred Option is inadequate. It should give priority to hydro power, should include CHP, should consider the constraints as well as the opportunities for wind and marine, and should incorporate policies for greater use of solar energy and for increasing energy efficiency.

The alternative option notes one factor that is relevant (grid capacity) but gives no indication of how far this might in practice be a determinant. There is however no point in planning for ambitious renewable schemes if transmission is a constraint.

Flooding (page 53)

95. There is no merit in permitting developments in flood-risk areas unless flood-prevention measures are an integral part of the development. Climate change suggests that the risks will increase (cf recent experience in Forres, Elgin and elsewhere).

Q.24. Flood risk assessment, as in the Preferred Option, should be a requirement in any case. But we prefer the alternative option of a more prescriptive policy which presumes against developments in flood-prone areas, or developments which increase the risk of flooding. Why run the risk and incur the additional costs of permitting building in flood-risk areas?

Waste management (pages 54-55)

96. The principles outlined (reduce waste, make more use of it through recycling and energy-generation) are sound. But the critical issue, and the most sensitive in planning terms, is the location of the processing facilities. It is not axiomatic that they should be located in the principal built-up areas. There is a cogent argument for locating waste-processing plants, of whatever kind, where they have the least impact on the environment and on the quality of environment of the local residents.

97. While it may be realistic to look to private developers to deliver waste-processing facilities (whether domestic or industrial), these need not be within new development sites, unless they are CHP projects. Nor should the HwLDP necessarily direct such facilities to existing industrial or business sites. And there should be a presumption against any waste development proposal which – to be commercially viable – would depend on the import of waste from outside the region (the Highlands should not become a dumping ground for the waste of other regions).

98. It follows that the locations indicated on the map (page 54) are not acceptable, since they appear to envisage facilities placed in, or near, the principal population centres – and in some case, in precisely those areas which the environmental and heritage section (page 44) suggests need special protection!

Q.25. We favour the alternative option. A pro-active policy which designates sites on the basis of objective criteria (minimal impact, prevailing winds, distance from population centres, etc) is more appropriate than a process of negotiation with individual developers which may result in a range of ad-hoc facilities whose location is simply a consequence of where developers choose to build.

Air quality (page 56)

99. The principal threats to air quality in the region are (a) traffic, (b) industrial processes and (c) aviation. This requires more than just a scrutiny of the impact of new developments. An effective policy to safeguard air quality should address the principal threats.

Q.26. The Preferred Option misses the point. Dealing with threats to air quality requires formal limits on emissions from new developments, whether residential or industrial); and specific action to alleviate or prevent the traffic congestion which currently poses the greatest air pollution problem (as manifested in parts of Inverness, and the A96 bottleneck in Nairn). Some simple measures (road widening, roundabouts instead of junctions, and fewer traffic lights) will make a major contribution to this objective. There needs to be joined-up thinking between transport and environment policies.

Sustainable design (page 57)

100. Improving design to take account of sustainability by site selection, orientation for solar power, insulation, and local materials are just as relevant for large-scale developments as for small scale ones. Likewise the aim of securing emission reduction applies to all development, not just larger-scale ones. This requires more than advice. The national standards are in effect minimum levels. Given the outlook for energy supplies and costs, and given the climatic conditions of the Highlands (it's a lot colder than Surrey), a policy for the Highlands for the next few decades — should apply much higher standards (eg on insulation and energy-efficiency) to new build. Scandinavia is a relevant model in this context.

Q.27. The Preferred Option is too feeble. Advice going no further than current government guidance will not deliver more sustainable, more energy-efficient buildings. There is a case for driving standards higher (which the draft claims as an objective) via the planning process, by requiring higher (future-proofed) efficiency and performance.

A Competitive, Sustainable and Adaptable Highland Economy (pages 58-71)

Business and Industrial Land (pages 58-59)

101. Other than a mention of proposals for marine renewables (not a core economic function of the region) and a general reference to “*low impact...industrial, business and service uses*”, there is no attempt to identify what kind of industry or business might be appropriate or relevant to the region. It is not necessary to be prescriptive. But a location and land use strategy for industrial and business development has to relate to the resources available (physical and human, capital and labour), and the access to markets (local or distant).

102. It follows that co-location of commercial and business activity within residential zones (fifth bullet of Preferred Option) is unlikely to be efficient or desirable.

103. It is surprising that despite the welcome reference to “*small scale rural businesses*”, there is no mention anywhere of the single most critical resource for such enterprise: telecommunications and IT. In view of the government’s recently published national broadband strategy, the provision of adequate network capacity across the Highlands should be a fundamental development objective. Such infrastructure is vital for the development of distance-working, homeworking, and the high-skills, low-impact, small-scale businesses that should be actively encouraged in a rural region such as the Highlands.

104. The reference to tourism is cursory and wholly inadequate, given that tourism and related services are among the main sources of income, employment, and revenue in the Highlands. Tourism is not simply about supporting the development of [construction] “projects”. It is about the development of an integrated strategy which recognises that successful tourism depends on protecting and indeed ‘showcasing’ those characteristics of the Highlands which attract visitors. This may indeed mean constraining development (eg in wild places). It may mean giving priority to recreation over industry (eg in use of river basins and in coastal development). It certainly means assessing the impact of any kind of development on the tourism-potential of the site and area concerned. There is a strong argument for developing a “Tourism Impact Assessment” requirement analogous to the current “Environmental Impact Assessment”.

Q.28. We do not agree with most of the Preferred Option. It is vague and inadequate. It is sensible to identify strategic sites, but this needs to be linked to resource-requirements and other factors. The reference to small scale local businesses is welcome but needs to be considerably developed. For all business and industry, the infrastructure and services such as telecomms and IT, transport/access, energy supply, labour and raw materials are as important as the designation of land.

We regard with extreme caution the idea of co-locating business and commercial development with residential housing. For that reason we see merit in the more rigorous approach in the alternative option.

Impact on the environment (natural and human) is a key factor. Much depends on the precise nature of the commercial activity proposed. Low-impact service businesses (hotels, restaurants) in residential zones is one thing. Waste plants, engineering industry, or cement works are something else!

Accessibility and transport (pages 60-63)

105. The general approach (pages 60-61) is unexceptionable as a statement of desiderata. What is lacking is a causal connection between the transport aspirations and the development objectives outlined in the draft. There is no point in setting ambitious targets for population/housing growth, or commercial development, unless the linkage with adequate transport and access is clearly made.

106. Taking each of the transport categories in order... On air services, there is no 'vision', indeed no mention, of the future evolution of Inverness (Dalcross) Airport or the regional air network. The STPR and the draft Local Transport Strategy (LTS) say little about this, which is ironic given the emphasis on the A96 Corridor Framework elsewhere in this Main Issues report. There is a serious risk that development around the airport (eg Tornagrain) will close off options for the further development or modification of the airport (eg an additional runway). Joined-up thinking is required.

107. Other than a desire to improve, there appears to be no clear plan for the ferry routes. The present services are still based on 19th century shipping practice. Again, the STPR and draft LTS say little about Highland region ferries or ports (other than that a study of RET and a review of structure are under way). How far is the HwLDP able to drive qualitative change or instigate a quantum shift – such as the introduction of facilities for high speed intra-island ferries, hydrofoils, 24/7 operation at peak times, etc?

108. Rail usage is more a function of fares and frequency than of the development of new or additional lines. But if there is to be expansion east of Inverness (whether or not based on the A96 Framework), then a substantial enhancement of the rail service will be key to minimising the additional congestion-load on a road network that is already suffering bottlenecks and capacity problems. And analysis of this eastern rail route has to address usage throughout the route (ie all points as far as Aberdeen, not just the Highland section).

109. The Road network raises a host of issues. A few not-quite-random examples illustrate the point.

- The plan gives no explanation of the significance of Rural Distributors, Strategic, and Premium (what's that?) roads;
- There is no description of the Active Travel Masterplans which are shown as existing for most major urban centres
- Park-and-Ride is unlikely to work effectively without an integrated review of, and changes to, the parking arrangements and costs in town-centres and retail parks (ie town centre parking charges and linked chargeable P&R won't work so long as peripheral retail-centre parking is free);

- Highland region is not an island. The evaluation of road use, and the prioritisation of improvements, on the A82, A9, A95 and A96 has to take account of the flows to and from adjacent regions.
- In particular, the proposed dualling of the A96 between Nairn and Inverness is NOT an appropriate objective in advance of a Nairn bypass and the upgrading/dualling of the A96 beyond Nairn at least to Forres and Elgin (both of which already have bypasses). To dual the A96 as far as Nairn without creating a bypass would accelerate the transformation of Nairn into a dormitory town, exacerbate the existing traffic bottlenecks within Nairn, stimulate the growth of “ribbon development”, and adversely affect the relationship between Nairn and its eastern hinterland.

110. In view of the emphasis on bringing about “modal shift” and encouraging public transport, walking and cycling, it is disappointing that there is no detailed discussion or proposed strategy for cycleways, not only within new developments but as part of the region-wide transport strategy. Both urban planning and recreational provision should involve, from the outset and not as a bolt-on afterthought, the design of cycle routes.

Q.28. [NB this is duplicate numbering – there is a Q28 on page 59]. We see no serious objection to the general approach described in the Preferred Option, but the devil is in the detail, and the draft is woefully thin on detail for any part of the region other than Inverness. Much more is required on regional air and ferry links. There should be explicit planning for cycle routes. The transport strategy for the ‘core area’ around Inverness needs to look holistically at the zones to the east (Nairn and beyond) and to the north-west (Black Isle/Beauly etc). It is not enough to plan to shift traffic around and through Inverness. There needs to be pro-active contingency planning for the wider transport network that the presumed expansion in population will require.

Crofting and Agriculture (pages 64-67)

111. There is a contradiction between the assertion in the narrative that “*crofting and farming are essential...and that as much of our good quality land is retained as possible*”, and the Preferred Option, which would allow development of prime agricultural land, “*...if the development is an essential component of the settlement strategy or necessary to meet an established need*”.

Q.29. Those two conditions in the second bullet are massive loopholes, and make the Preferred Option unacceptable. In effect they say that if any settlement and housing development is deemed (by whom?) to be needed or essential, this can override the preservation of prime agricultural land. If agriculture is an essential part of the Highland economy, then encroachment on prime land should only be permitted in very exceptional circumstances.

Q.30. No substantive objections – the Preferred Option seems reasonable.

Q.31. No comments

Q.32. No comments, other than to wonder what constitutes a “crofting township”?

Q.33. The issue (does it relate only to woodland crofts?) is not explained.

Coastal Development (page 68)

112. The draft refers to the Council’s vision but does not describe it. The Coastal Development Strategy (CDS) is still in draft (and subject to separate consultation), and policy on marine renewables is also evolving, so the issues for development planning have not been fully identified. But the CDS does highlight the importance of the Highland coastal regions for landscape, tourism and recreation, and notes that development pressure is greatest on the east (Moray Firth) coasts. The HwLDP should echo this assessment, and shape development planning accordingly.

Q.34. We support the linkage with the CDS (first bullet point in the Preferred Option), and the intention (third bullet) to have a clear policy on aquaculture. But we reject the second bullet point, which proposes a peculiar kind of limited and double-negative planning control: development “...*not hindered where it will not have an impact on any specific designation or the character of an area*”. This would be more logically expressed as a policy in which development will only be considered where it has no detrimental impact on the designation or character of the area. Safeguarding the region’s very special coastal and marine assets requires no less.

Forestry and Woodland (pages 69-70)

113. The importance of forests and woodland is well-explained. The only omission is a reference to the increasing use of woodland for recreation, health and well-being (walkways, cycle trails, picnic sites) as is already being fostered by the Forestry Commission.

Q.35. We broadly agree with the Preferred Option, but would prefer to see inclusion of a reference to managing the resource for recreational purposes as well as for other environmental and commercial reasons.

Minerals (page 71)

114. It is right to aim to minimise the environmental cost and impact of mineral and rock/gravel extraction.

Q.36. We agree the Preferred Option, and see no reason not to pursue the alternative option as well – provided any new resources identified are subject to the same control regime.

A Healthier Highlands (pages 72-73)

Open Space and Physical Activity (page 72)

115. We agree with the approach outlined, both on open spaces within developments and on green networks. We support the designation of green networks between Inverness and Nairn (which are self-justifying in their own right and do not depend on, or need to be a part of, the A96 Framework). A necessary adjunct of this approach is design-led guidance which creates space within the wider urban context: parks in town centres, green margins along road sides in residential areas, private gardens (rather than paved communal areas), and land left 'natural' within new developments (cf Sanquhar in Forres). And there needs to be greater recognition of the fact that green spaces (eg parks and wetlands) can be preferable to, and are easier to maintain than, constructed sports/recreational facilities

Q.37. We agree the Preferred Option, subject to deletion of the words "where appropriate" in the first bullet point.

Access to the Outdoors (page 73)

116. We support the development of core paths and long distance routes and the protection of access rights. There should be specific mention of cycle routes (the Sustrans initiative) – there is considerable scope for extending such networks. And given the vast extent of Highland coast, a regional access policy should also have as a clear objective – integrated with the CDS and a tourism strategy – the creation of a Coastal Path (cf the Moray Coast Path in Grampian/Moray).

Q.38. We believe the Preferred Option should go further, and should specifically identify cycle routes and a region-wide coastal path as policy objectives.

CONCLUSION

117. The Main Issues Report identifies many of the key questions which a plan for the future of the Highlands over the next 20-30 years must address. Most of the broad strategic objectives are sensible. But – as these detailed comments indicate – there are some important issues which have not been fully considered, and some elements of policy which are misconceived, outdated or inadequately thought-through.

118. Considerable time and effort has been devoted to the process of consultation – and to the preparation of responses. The effectiveness and acceptability of the Highland-wide Local Development Plan, when it is drafted, will depend on how far it takes on board and reflects the comments and feedback which have been offered.

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