

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

Reference Number:	HWLDP-MIR-241
Organisation/Individual:	The Highland Council (Dot Ferguson – Ward manager, Lochaber)

Action:

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

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

Issues Raised in Response:

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

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	
Accessibility and Transport	x
Agricultural Land	x
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	x
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:

<p>Should balance growth throughout whole of Highland Response sets out a West Coast Vision Transport issues raised Affordable housing is a major constraint in economic development of the area Usefulness of developer contributions will be limited in rural areas Lochaber should be promoted as a tourist destination</p>

Action Sheet Completed by:	SH
Date:	10/12/09

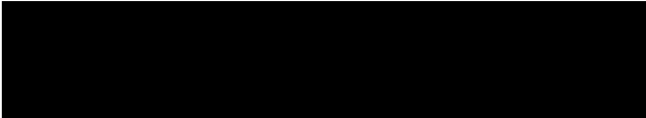
Dawn Sutherland

From: Dot Ferguson
Sent: 09 November 2009 14:42
To: devplans
Subject: Lochaber response to the Highland wide Local Development Plan

Please find attached the Lochaber response to the above document. The second file attached forms appendix 2 of the response and for clarity, the line should encompass the whole of Morvern and all the Small Isles and Skye.

Thank you.

*Dot Ferguson
Lochaber Wards Manager
The Highland Council
Lochaber House
FORT WILLIAM PH33 6EL*

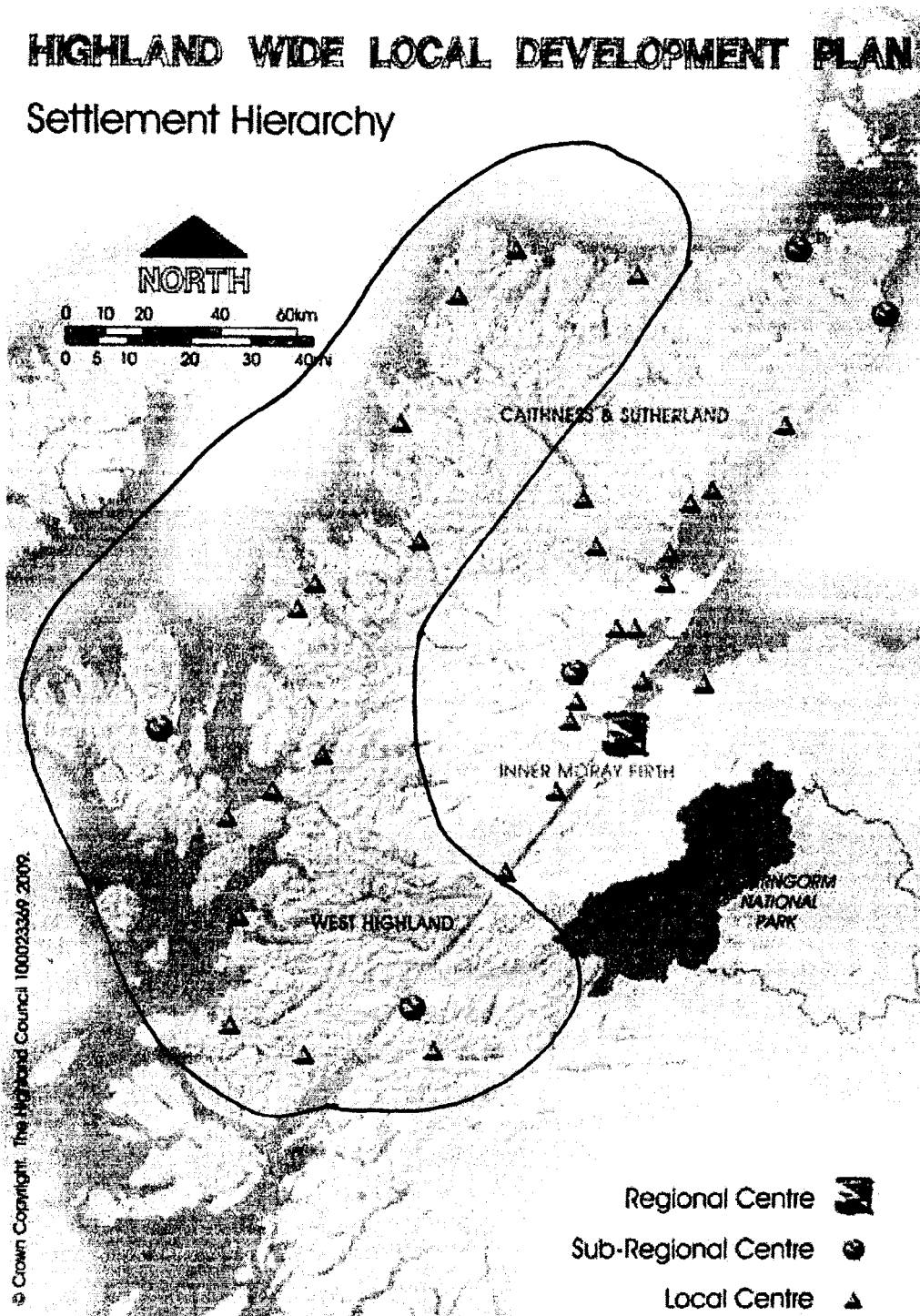


Development of Local Centres

The development of Inverness and the surrounding areas should not be at the expense of other parts of Highland. The smaller towns like Fort William, Wick, Thurso, Portree, Dingwall or key villages like Ullapool, Durness and Broadford are equally important in our strategy.

HIGHLAND WIDE LOCAL DEVELOPMENT PLAN

Settlement Hierarchy



HIGHLAND-WIDE LOCAL DEVELOPMENT PLAN

LOCHABER RESPONSE TO MAIN ISSUES REPORT

1.0 INTRODUCTION

The Highland-wide Local Development Plan (HWLDP) was published for consultation on 31 August 2009. The document has been the subject of a presentation to the Lochaber Joint Wards Forum and has been considered by the Fort William Steering Group (FWSG) and the Lochaber Partnership (LP) - Lochaber's community planning partnership. The membership of both these groups is attached at **Appendix A**. The Coastal Development Strategy has also been considered.

- 1.1 Whilst a questionnaire was provided for responses to specific key questions, both the FWSG and the LP feel that it is not appropriate to make their response in this format, due to the nature of the comments being made.

2.0 LOCHABER COMMENT ON REPORT CONTENT

- 2.1 The content of the report concentrates to a large extent on the Inverness and the wider Inner Moray Firth areas and it is considered that this is detrimental to the west coast communities and diminishes the role they play in the economy of the wider region. The report indicates that particular focus is given to the development issues around Inverness and Nairn, Caithness and North Sutherland and Nigg, given their development pressures. However, there is an equal argument that rural areas which have the potential for significant sustainable economic, environmental and social development should also be focused on. The current strategy does not encourage the necessary mechanism to deliver economic growth in the west.
- 2.2 It is further considered that in order to redress this imbalance, a stronger emphasis should be placed on the west coast area. This should be achieved by the inclusion of a West Coast 'chapter' in the document encompassing the Lochaber, Skye and North West Highland area (as per the plan attached at Appendix B). This should recognise the challenges faced by these communities but more importantly will identify the aspirations they hold and the opportunities this area offers.
- 2.3 The West Highland identity should be more clearly defined and its lack of commonality with Inverness and the wider east coast should be acknowledged and respected. The importance of these differences should be recognised in all future strategic plans and proposals and take cognisance of the fact that a "one size fits all policy" is unworkable and indeed unacceptable.
- 2.4 This request for greater emphasis on the West Highlands is supported by colleagues in Skye, Wester Ross and Sutherland.

3.0 A WEST COAST VISION FROM A LOCHABER PERSPECTIVE

Lochaber with its neighbours to the north, south and west form a strong 'community of interest' sharing key transport links, relations with the sea and a fragile economy, underpinning a sparse and sometimes remote population. This commonality gives it strength and resilience but leaves few shared concerns with the east coast, other than the desire for a vibrant sustainable economy.

The following comments should be considered as the core of the Lochaber response within the 'chapter' of a West Coast vision:

3.1 Transport – strong transport links to and from Lochaber for both people and freight are critical to the economic, social and environmental well-being of the area. In terms of the importance of effective transport links, it should be recognised that transport needs to link effectively between communities in order to maximise the social and environmental benefits and should not just be seen as spurs from a city or town hub.

Road - the A82 is crucial to the whole of the west coast, given that it is one of three arterial routes linking the Highlands and Islands with commercial centres in the central belt and the north-east of Scotland. It is the only commercial transport corridor providing connectivity from the South to the West Highlands, Skye and the Western Isles and is a lifeline road for the movement of goods, services and people into and out of these areas. In overall terms the A82 is of a very poor quality and journey time confidence is low. Following recent studies it has been reported that there would be clear benefit to economic development and job opportunities in the area with an investment programme to upgrade the A82. It has been further recommended that by upgrading improvements (particularly Tarbet to Inverarnan, Crianlarich by-pass and Onich to Fort William) the character, quality and safety on this key route will be greatly increased. In response to the declining condition of this major trunk road, a massive lobbying campaign was successful in ensuring the improvement of the A82 is built in to the Strategic Transport Projects Review (STPR) and ongoing pressure is required to ensure this is delivered - Highland Council continues to meet with the Transport Minister to progress this issue. A Route Action Plan (RAP) was previously carried out from Glasgow – Fort William, however this should be continued to include Fort William – Inverness.

Fort William Trunk Road extension – it has been a long held aspiration to construct an extension to the A82 trunk road between An Aird and 'the Kennels' – (roughly around Fort William Golf Course) in order to ease the traffic congestion which builds up in the town centre, causing considerable tailbacks and frustration. Due to increasing visitor numbers and changes in local dynamics and traffic patterns, this congestion is increasing and local partners would like to see the extension progressed.

In addition, a relief road (between An Aird and the A830 Mallaig Road at Blar Mhor Industrial estate via Caol) has been in the Local Plan and the route thereby safeguarded for some years. It has been estimated that around one third of the town's traffic is 'passing through' and therefore any road improvements which help ease the flow of traffic will make a marked difference to the local congestion. The pressure on the current trunk road, doubling as a 'local road', would be eased considerably allowing further economic expansion of the Greater Fort William area and the wider West Highlands. Currently there is also considerable risk in terms of emergency service response when the trunk road is completely congested.

Corran Ferry – this route must be recognised as a vital transport link and in the short term requires improved berthing facilities as well as the availability of a larger, stand-by ferry. In the longer term, consideration should be given to construction of a fixed link, with opening middle section, incorporating tidal generation capacity.

Sea - improvements to sea transport are equally important to reduce the volume of freight on the roads making driving to and from Lochaber a safer and more pleasant driving experience. Efficient and effective ferry links with the Small Isles, Mull, Skye and the Western Isles (including new small fast ferries being trialled) are also crucial to Lochaber's economy.

Canal – while the current use of the Caledonian Canal is predominantly for leisure, there is also a growing market for its use for the movement of freight and for transit of commercial traffic. The canal's leisure market contributes around 14% of the total tourism spend in Highland and this continues to grow (particularly the canoe market which is growing at in excess of 25% per year). The holiday hire fleet is growing at a significant rate and there may also be potential for wintering facilities for yachts.

Opportunities for the wider development of marine based tourism for the west coast and islands exist via the development of the canal both at Banavie and Corpach, which would draw traffic through from the east coast. These are being actively considered by British Waterways Scotland.

Rail - The West Highland Rail Line and the rolling stock able to use it requires significantly more investment from that currently provided. While there is capacity in terms of line time the restriction in train lengths and weights curb the development of railside loading (timber) and this coupled with the availability of suitable locomotives able to work on the route, are stifling development

Air - the benefits of air transport must also be recognised in increasing tourism and commercial opportunities. This includes the limited infrastructure required by seaplanes but extends to aspirations for a small airstrip (sites previously identified).

Inter-modal / freight - the existence of the rail, road and sea transport hub at Corpach with public access, gives Lochaber an economic advantage shared by very few towns in Highland and this should be maximised while minimising any negative social or environmental impact. Better infrastructure is required for servicing of larger boats and ferries if the benefit of sea and canal travel is to be maximised. The flexibility of an area to offer inter-modal shift for transport of freight gives a distinct advantage and given the volumes/nature of freight being moved to and from Lochaber this is welcome and should be developed further. Current freight includes the following:

Forestry – in Lochaber, timber production is currently over 100,000m³ from Forestry Commission Scotland alone. This is transported across Scotland and volumes are predicted to increase year on year for the next fifteen years. A similar rise is predicted from the private forestry sector. This is supported by the multi million investment to create a state of the art timber sawmill which will look to manufacture most of the timber produced locally for export outwith the area. Currently this is mostly by road but novel schemes are being developed to increase the volumes moved by sea and rail. Again it is essential that the appropriate infrastructure is in place to ensure economic extraction, without creating any negative social or environmental impact.

Other freight which is regularly moved (predominantly by road) includes fish and other animal feed; quarry products; waste; fuel deliveries. Rock salt is currently imported by sea for the Council and trunk roads.

- 3.2 **Housing need** – the lack of affordable housing is recognised as the major constraint in economic development in Lochaber – with more than 800 people registered on the Highland Housing Register for Lochaber, there is huge pressure to increase the quantity of housing stock available. The definition of ‘affordable’ housing should be examined as many people are no longer able to afford ‘affordable’. In Lochaber, the current ratio of 1 in every 4 houses built in a development being ‘affordable’ is seen as inadequate and it is agreed that this should be increased to 1 in 3, to reflect the continuing pressure.

Social rented housing should also be examined more rigorously as an alternative. It has been widely acknowledged that the strongest economies are in regions which have a high level of social rented housing. More emphasis should be placed on this in the document and mechanisms to encourage a greater supply of rented housing should be explored.

The Council should also look at more imaginative mechanisms to release some of its landholdings to developers in exchange for a percentage of the housing developed being handed back to the Council for rental.

- 3.3 **Developer Contributions** – there are several references within the document to the provision of services, infrastructure etc using developer contributions.

While there is a recognition in the document that in the rural areas this will be less effective, it must be recognised that the potential to deliver anything meaningful using this route is very small in the rural areas due to the normal scale of developments. In addition, the extraordinary costs of development on the west coast should also be factored in.

The suggestion of accumulating a 'pot' from individual small developments is welcome, but given the time to acquire a meaningful sum the usefulness of this approach will be severely limited. Some thought should be given as to whether there are other options for the rural areas and if not, then this needs to be highlighted more clearly in the document.

- 3.4 Coastal areas** – the coastal areas provide considerable potential to deliver significant economic benefit in particularly fragile areas. Corpach/Mallaig/Kishorn etc all have the potential to benefit from future renewable energy projects possibly in terms of fabrication or (possibly more likely) servicing and maintenance of renewable technology. It is therefore imperative that the future for development of these sites for further commercial and industrial activity is protected.

Aside from the industrial and commercial elements, the coast offers considerable economic benefit if the infrastructure for leisure yachts is strengthened in terms of both pontoons and moorings as well as shore facilities for leisure yachts in areas such as Fort William, Lochaline, Mallaig, Skye and the north west.

In considering the Coastal Development Strategy, it was felt that the low level of detail and generalisations of 'developed', 'undeveloped' and 'isolated' were virtually meaningless. A more robust classification would be welcomed with more detail set out eg current pockets of development etc perhaps based on the type of modelling used in Norway and Canada. A model of good practice suggested is that adopted by the Scottish Sustainable Marine Environment Initiative (SSMEI) Sound of Mull Project and it was felt that more weight should be given to local management plans where these exist and/or expanded loch framework plans.

Ferries, marinas, fish-farm infrastructure etc all depend heavily on working within a policy context which allows appropriate development.

- 3.5 Lochaber as a tourism destination** – Lochaber enjoys a world-wide reputation as a tourism destination, largely due to the existence of Ben Nevis and the rest of the area's outstanding environment which also encompasses the most westerly point on the mainland, deepest loch etc. Although the area only has a resident population of around 19,000, more than 1 million visitor bednights are spent in Lochaber. The value of tourism to the local economy is around £175 million per annum, with potential for considerable growth, but only with investment in infrastructure – predominantly the transport network.

There has been a noticeable growth in visitors utilising the outdoors, including canoeing, wildlife watching, canal users, long-distance route walkers etc. These are not just 'extreme sports' enthusiasts but visits by families and older people enjoying the outdoors in a more leisurely way. The facilities necessary to allow them to enjoy their stay and to maximise the economic benefit must be in place and this includes development of small-scale, sustainable businesses and infrastructure such as boat slips etc.

- 3.6 Lochaber as an event destination** – Lochaber, without doubt, justifies its title of the Outdoor Capital of the UK. This clearly builds on the work of the Outdoor Capital of the UK company, plus the range of events which has built up in the area. However, to be successful, these events require considerable infrastructure and funding, given the volume of visitors which they bring to the area. These events need to be recognised as events which showcase and benefit the widest Highland area, extending the length of stay and encouraging travel throughout the area.

Again, to maximise the benefits the West Highlands must have an integrated multi modal transport system which is fit for purpose and which encourages, not discourages people to visit and stay longer.

- 3.7 **Renewables** – Lochaber has the landscape to deliver significant renewable energy projects and indeed has been doing so for a hundred years. Concentration on hydro and tidal power would be welcomed, although it is recognised that after the construction period there is little economic benefit in hydro schemes from eg job creation. However, there is a significant opportunity for community benefit, *particularly where the community wholly owns or has an equity stake in such developments*. Limited wind power schemes are also possible. The sector is being constrained by limited grid connections resulting in long lead-in times for developers and this needs to be resolved urgently. Work needs to be done to upgrade mainland power lines to allow these developments to happen as well as a west and east coast subsea inter-connector.

Partners in Lochaber agree that they would wish to see a planning policy pursued, similar to that for affordable housing, where there is a direct link between the number of units built and the number allocated as affordable housing and where this is built in at the planning application stage. Similarly where a planning application is submitted for eg five turbines, then the community automatically receives the profit from one of them. Otherwise, the potential for real community benefit will remain unrealised.

With regard to tidal power, it is disappointing to note that potential schemes at Corran Narrows, Annat and Ballachulish have been omitted, (as have several other west coast schemes), despite being identified in the Highland Renewable Energy Strategy and these should be included in the HwLDP.

Opportunities for skills training in both construction and maintenance need to be made available if any benefit is to be accrued from renewable technology in the wider Highland area.

- 3.8 **Rural filling stations** – in order to protect the economic and social fabric of the most fragile areas, it is necessary to ensure the continued existence of 'lifeline' petrol stations. These, often along with an adjoining business such as a village shop or post office, are key facilities which should enjoy an enhanced status.

- 3.9 **Protection of good arable land** – despite Lochaber appearing to enjoy vast swathes of open countryside the availability of good quality agricultural land is limited. It is considered essential to protect these areas from developments which could take place on less valuable ground.

The Council's recent consultation on an allotment policy has resulted in a strong response from communities. In Lochaber, several groups are pursuing community allotments and given the resulting social and environmental benefits (including the reduction in food miles), this is to be welcomed. It is therefore essential that good-quality, productive ground is protected.

Forestry land is also a highly valued resource in terms of multi-use by communities for leisure, commercial and other business uses and the current policy by FCS Lochaber which welcomes this chequered use of the forest estate must be protected. In addition, the concept of woodland crofts is welcome, to link housing, local rural livelihoods and woodland management. This has the potential to bring new business dimensions to crofting activity and enable ideas behind land reform and rural development to be realised.

- 3.10 **Ferries and marinas** – the production of the draft Coastal Development Strategy also provides opportunities for comment and links with the WHLDP. Ferries, marinas, fish-farm infrastructure etc all depend heavily on working within a policy context which allows appropriate development.

3.11 **Hospital** – underpinning both the economic and social well-being of the area is the requirement for a ‘new Belford Hospital’. An appropriate design brief and site acquisition need to be progressed as quickly as possible, with the most likely site being adjacent to the Fort William Health Centre.

4.0 **SUMMARY**

4.1 In summary, the Fort William Steering Group and Lochaber Partnership have reviewed the HwLDP and agree that in its current format it is detrimental to the West Highlands and that it does not offer the necessary framework to deliver the economic and social growth necessary for the well-being of its widest communities.

4.2 In order to redress this imbalance, the following views should be included:

A West Coast ‘chapter’ should be included in the document, highlighting the following:

- that Lochaber views itself as *the* event destination for Highland, hosting events of international significance, generating considerable revenues and publicity for the whole of Highland, but recognising that these events demand considerable infrastructural and financial support
- that it views its tourism offer as almost wholly dependent on its environment and particularly sees marine tourism as a lucrative market which it is ready to develop and which will benefit the whole of the west coast
- that it views its coastal location and intermodal transport hub as a key facility in being able to secure business from the future renewables industry as well as for the effective movement of freight
- to achieve the above, the imperative task is the upgrade of the A82 and the improvement of all other transport links in and out of the area to ensure the greatest economic, social and environmental benefit to the whole of the West Highlands
- an increase in affordable housing, particularly in the social rented sector is required to attract the necessary work force and to help young people remain in the area
- the ‘working environment’, eg good arable land and forestry, must be protected in order to ensure a vibrant and sustainable way of life in the most fragile areas
- that given the low rate of development in the more rural areas, developer contributions cannot be relied on to deliver much of the infrastructure necessary and therefore an alternative structure should be considered

Fort William Steering Group

Fort William & District Chamber of Commerce
Fort William Community Council
Fort William Retail Association
High Street Events
Highland Council
Highlands & Islands Enterprise
Lochaber Housing Association
OCUK
VisitScotland

Lochaber Partnership

Association of Lochaber Community Councils
British Waterways Scotland
Fort William & District Chamber of Commerce
Job Centre Plus
Highland Council
Highland Health Board
Highlands & Islands Enterprise
Highlands and Islands Fire and Rescue Service
HM Coastguard
Kevin Peace, Forestry Commission Scotland
Lochaber College UHI
Lochaber Housing Association
Lochaber Trades Council
Mallaig and District Chamber of Commerce
Northern Constabulary
Scottish Natural Heritage
Skills Development Scotland
VisitScotland
Voluntary Action Lochaber

APPENDIX B

West Coast 'plan' – see separate attachment