

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

Reference Number:	HWLDP-MIR-240
Organisation/Individual:	Turnbery Consulting – Highlands and Islands Enterprise

Action:

Immediate Response Required	
Meeting required with Respondent	x
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		Previously used Land	
NPF2 for Scotland	x	Wild Land	
Vision for the Highlands	x	Water Environment	
Inverness and A96	x	Renewable Energy	
The A96 Corridor		Flooding	
Phasing of Development		Waste Management	
Developer Contributions	x	Air Quality	
East Inverness	x	Sustainable Design	
Nairn		Business and Industrial Land	
Tornagrain		Accessibility and Transport	
Smaller Settlements in A96		Agricultural Land	
Caithness and North Sutherland		Subdivision of Existing Crofts	
Easter Ross and Nigg		Allocation of Inbye Land	
Development of Local Centres		New Crofting Township	
Wider Countryside and Fragile Areas		Small Scale New Crofts	
Population and Housing		Coastal Development	
Housing in the Countryside		Forestry and Woodland	
Affordable Housing		Minerals	
Planning for an Ageing Population		Open Space and Physical Activity	
Gypsies/Travellers		Access to the Outdoors	
Retailing		Comments on Consultation Process (+ve)	
Developer Contributions		Comments on Consultation Process (-ve)	
Natural, Built and Cultural Heritage			

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

Sets our aspirations for Beechwood Campus
 Should contain reference from NPG2 on the Campus
 Should be emphasis on role of UHI in the Vision for the Highlands
 Does not consider A9-A96 link necessary for early phase of development
 Suggested supporting text to put forward campus
 Support for developer contributions in principal
 East Inverness framework should be adjusted to fully reflect the campus project

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

Dawn Sutherland

From: Tom Ashley [REDACTED]
Sent: 09 November 2009 14:29
To: devplans
Cc: Jonathan Coulson
Subject: HwLDP Main Issues Report: HIE - Beechwood

Sir/Madam

Please find attached Highlands and Islands Enterprise' response to the HwLDP Main Issues Report.

Regards

Tom Ashley
Turnberry Consulting Limited
41-43 Maddox Street
London
W1S 2PD
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09/11/2009

Malcolm Macleod
Development Plans Manager
Planning & Development Services
The Highland Council
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Inverness
IV3 5NX

H.C. PLANNING AND DEVELOPMENT SERVICE		
11 NOV 2009		
PASS TO	INITIALS	DATE
	RH	
	MM	

09 November 2009

Our ref L THC 09.11.2009 HIE
Your ref

Dear Sir/Madam,

Highland-wide Local Development Plan – Main Issues Report

This representation is made on behalf of Highlands and Islands Enterprise (HIE) in response to the Highland-wide Local Development Plan (HwLDP) Main Issues Report (MIR) with specific regard to the land owned by HIE at Beechwood Farm, Inverness. The comments made below generally respond to the structure and format of the MIR document. However, we begin with some general remarks that explain the aspirations that HIE has for the Beechwood site.

Overview

HIE purchased the Beechwood Farm site in 2009 as part of its strategy for pursuing its vision to assist in the creation of the Inverness Campus, (referred to in the MIR as Beechwood Campus). This is the largest project HIE has ever undertaken at its own hand. The project will:

- Deliver a major new academic campus for a variety of education and research institutions including in particular for UHI, as it move towards full university status, so providing a platform for it to compete internationally whilst attaining sustainability in terms of student numbers, research and funding.
- For the first time provide a regional focus for major high value inward investment propositions, substantially adding to the regional and national offering.
- Build on the existing growing healthcare cluster to a nationally and internationally significant level.
- Provide a knowledge intensive creative and collaborative environment that will help to anchor and expand existing R&D capacity at Lifescan and Johnson & Johnson.
- Create the conditions for significant new high value and growth business start ups and spin outs, which would offer regional career paths for professionally qualified people.

By 2030, it is envisioned that up to 6,000 new jobs will be located on the site, this achieved through major public sector investment from the organisations including HIE, UHI, Inverness College, Scottish Funding Council, NHS, and the Scottish Agricultural College, alongside a

wide range of private and other third sector investments. This activity combined with the presence of thousands of undergraduate and post-graduate students will create a rich, dynamic and innovative environment ensuring that Inverness becomes a true University City which provides a significant contribution to the Scottish economy.

In March 2009, HIE submitted an outline planning application for this new education education campus and associated development comprising:

“Education Campus and related Mixed Use Development comprising Non-Residential Institutions (70,480m²), Business (62,300m²), Residential Institutions (44,950m²), Assembly & Leisure (9,000 m²), Residential (up to 200 Units) and associated Landscaping, Open Space, Infrastructure and Services”

The application included a detailed master plan for the campus, prepared following a comprehensive programme of engagement with key stakeholders including the future users of the site, community representatives and the Council.

However, the requirement to provide certainty over delivery in the short term of essential early phases of the campus through the development management process, has led HIE to prepare for the submission of a separate outline planning application for phase 1 only of the proposed development. This application is likely to be for a maximum of 55,000 sqm of floorspace, of which all will be focused on the core academic campus area.

HIE remain committed to delivering all phases of the campus. HIE are therefore seeking to ensure that the Highland wide Local Development Plan (HwLDP) provides a supportive policy basis for delivering all phases of the campus to create a first class higher and further education facility and supporting development for the Highland region.

Representations on the MIR

Having set out this background, we now turn to comment specifically on the content of the MIR.

Section 2: National Planning Framework 2 for Scotland and the Highlands

HIE notes that under the provisions of the 2006 Planning etc. Act and supporting regulations, the Council is required: *“to take the [National Planning] Framework into account when preparing the development plans” (NPF2, Paragraph 2)*. To this end, reference to NPF2 in the context of the Highland region is welcomed at section 2, but HIE is concerned over the absence of specific reference to the Campus project and the Beechwood development opportunities notwithstanding a series of specific references contained with NPF2 as listed below:

- Para 46 – recognition that Scottish universities, higher education institutions, and further education colleges lie at the core of the strategy for developing the skills base necessary to support a knowledge driven economy.
- Para 50 - reference to good governance, community empowerment, education and local initiatives as essential elements for successful place-making.

- Para 64 – specific comment on the UHI Millennium institute campus project at Beechwood.
- Para 113 – Support for the Strategic Transport Projects Review 2012 – 2022 outcomes, of which improvements closely linked to the campus project are identified.
- Para 133 – more specific reference to support for the proposed improvements to the A9 and A96 within the vicinity of the campus.
- Para 212 – the role played by the Centre for Health Science in supporting the growth of the biomedical cluster and the knowledge based economy.
- Para 214 – support for the Council's A96 Growth Corridor Development Framework, of which the Campus and wider development aspirations for the site are included.

HIE requests that these specific references are acknowledged explicitly within the HwLDP where a summary of those aspects of NPF2 that are specific to the Highland region are being noted.

Section 3: The Vision for the Highlands

In a similar vein, HIE welcomes clarification in section 3 of the Council's vision for the region. For the MIR, this vision is articulated in a number of thematic objectives, all of which are supported by HIE. However, there is an absence of any specific reference to the role that the campus project and associated development of the HIE landholding at Beechwood can play in assisting with the delivery of these objectives and as such the vision for the region. As such, we would request that any such objectives-based summary of the vision for the region that is set out with the HwLDP, contains within it explicit reference to the campus and the key role this development could play in delivering on the vision for the region.

Section 4: The Spatial Strategy

Inverness and the A96 Corridor

It is appreciated that the Council would wish to put in place as a priority the conditions that will bring forward essential development of key city centre sites. However, it is important that the linkage between these issues and the development of the HIE Beechwood landholding are properly highlighted, and adequately addressed in policy that comes forward as part of the HwLDP. Responding specifically to the bullets on page 8 of the MIR:

- The role of the proposed Beechwood campus could be significant in allowing the relocation of key activities in the short term that free up the potential for the relocation of other land uses and the regeneration of certain areas of the city more in need of investment. An example of this would be the relocation of Inverness College to the Beechwood campus site, and the opportunities that then arise for regeneration of the vacated site at Longman.
- It should be acknowledged within this context that creation of the A9-A96 link road is not an essential requirement at least for initial phases of development of the campus and other parts of the Beechwood east area. This is commented upon further below but should be addressed appropriately within the HwLDP.

The A96 Corridor

HIE supports the view that the long term growth of Inverness should be directed towards the A96 Corridor. HIE agrees that physical factors constrain the growth of Inverness to the north, south and west and: *“as a result development to the east of the city has been identified as the most deliverable long term growth opportunity.” (Page 10)*

HIE agrees there are no reasonable alternatives to the A96 for accommodating the long term growth of Inverness. As such, the HwLDP should reflect the identification of the A96 Corridor as an *“area for co-ordinated action”*.

HIE recognises that the delivery of the development within the Corridor is dependent upon a number of improvements to the infrastructure between Inverness and Nairn. In particular, HIE recognises that the existing highways capacity around the Raigmore junction is limited and as such growth in and around East Inverness needs to be carefully managed in the absence of the A9-A96 Trunk Link Road. Notwithstanding this, HIE believes that an interim campus access solution will accommodate a significant proportion of the proposed Beechwood campus development prior to the implementation of the A9-A96 Trunk Link Road. This position was set out in the Transport Assessment that supported the Outline planning application of April 2009, and is the subject of ongoing discussion with the key consultees on this matter including the Council own TEC Services officers and Transport Scotland.

Proposals for the A9-A96 Trunk Link Road form part of the Government's STPR 2012-2022 and so a commitment in principle to implement this scheme is already in place. We believe this position should be identified within the HwLDP.

Therefore, although HIE is broadly supportive of the preferred approach of supporting early phases of development across the corridor, it would suggest that any reference to early stage development prior to the implementation of major infrastructure should not be unduly restricted by a particular point in time, but by the capacity of existing infrastructure or improvements to that infrastructure that are deliverable, and so able to cope with the scale of development that is proposed. In the case of the HIE landholding at Beechwood, proposals for transport access to the site could be demonstrated to address development beyond the suggested 2011-2016 timescale, and so we would request that the working of any policy within the HwLDP to address this matter is not unduly restrictive.

Furthermore, HIE considers the delivery of the Beechwood Campus crucial to the future economic and social prosperity and success of Inverness and the Highland region. As such HIE considers it important that, in the absence of the A9-A96 Trunk Link Road, the delivery of the Campus is prioritised above other development proposals within East Inverness. Not least since an appropriate interim infrastructure solution can be delivered facilitating delivery of at least the first two campus phases, as explicitly acknowledged in the Main Issues Report:

“The provision of access improvements will allow the development of Inverness College and related activities to progress”

HIE suggests that the HwLDP includes the following text in support of the allocation:

“The Highland Council considers the new education campus at Beechwood is a key development within the A96 Corridor and will support the phased delivery of this development in the period up to 2021 and beyond so long as appropriate and acceptable measures are put in place to address requirements for necessary improvements to infrastructure.”

HIE does not consider it appropriate to link delivery of the campus to outcomes of existing sites in Inverness. As commented upon earlier, it considers that the development of the campus at Beechwood in itself facilitates the opportunity for regeneration and further development within the City, and the policies of the HwLDP should recognise this in ensuring that development at Beechwood is not unduly tied to a phasing strategy that prioritises the opportunities within the City Centre. We therefore request that the wording of the Preferred Option be amended to address this issue within the HwLDP.

Development Contributions in the A96 Corridor

HIE supports in general terms the suggestion of a policy within the HwLDP to address the form and operation of a developer contributions protocol. However, in addition to engagement and commitment from the key statutory agencies such as Transport Scotland and confirmation of the linkage between this policy and the Council's investment plans, we request that such a policy also has regard to actual investment made by developers into the physical delivery of key infrastructure which may be local to a specific area but where there are clear benefits to the City and the region. The Council must ensure that any such developer contributions protocol policy does not levy a financial burden on a specific development project where that project has already contributed through actual infrastructure provision.

Area Specific Issues - East Inverness

HIE is broadly supportive of the principles set out in the Main Issues Report in respect of East Inverness. HIE agrees that East Inverness is *“the most important area for the future expansion of the City in the short term”*.

Further to our comments above, HIE is pleased that the Main Issues report explicitly acknowledges that the Beechwood Campus is a key priority for delivery within East Inverness; HIE considers the campus a priority not only because it will meet the need for first class higher and further education facilities, and research, serving Inverness and the wider Highlands; but also because the campus will provide an important economic, social and community based resource for the communities of East Inverness, the City and the region overall.

In relation to the stated *‘key issues for the East Inverness area’* at p.16, the first bullet should be amended to reflect that fact that the campus project involves a series of key occupiers, and not just Inverness College in isolation. The Council is aware that the current partners include: UHI, Inverness College, Centre for Health Science, Scottish Agricultural College, NHS and others. Policy within the HwLDP should acknowledge this multi-partner approach.

The comments made under the 'The A96 Corridor' sub-heading above in respect of suggestion of any restrictions on the timing of delivery of development apply equally to the Council's Preferred Option on p.16 for East Inverness and we request that these points are addressed in the preparation of policy to address this area within the HwLDP.

As stated above, the HIE landholding at Beechwood has been the subject of extensive master planning and associated technical analysis since the publication of the A96 Growth Corridor Development Framework. This work has already been the subject of a public consultation exercise and outline planning application, and this process will be repeated by the end of the year with a further consultation exercise on the forthcoming outline planning application. This work therefore represents a far more detailed level of analysis in terms of the development potential of the land than was previously undertaken by the Council at the Framework stage. Accordingly, we would request that the outputs of the HIE master plan are reflected within site or area specific policy that is proposed within the HwLDP for the East Inverness Area.

We attach a plan of the HIE land ownership in this area. A summary of land uses and associated development outputs from the master plan produced in support of the April 2009 outline planning application is set out below, and we would request that the HwLDP addresses the following development capacities for this land ownership area:

	<u>Up to 2021(sqm)</u>	<u>Total(sqm)</u>
Education/Campus including residential Institution -	84,000	115,000
Business -	32,500	62,500
Indoor sport and recreation -	9,000	9,000
Residential (units) -	100 units	200 units

It is acknowledged that the areas above deal with the total development capacity of the HIE Beechwood landholding, with an estimate only of the amount of development that is capable of coming forward over the plan period to 2021. However, we consider it important that the HwLDP identifies at this stage the full development potential of the site, but with appropriate policies in place to address matters of phasing over the plan period.

It is equally important that any proposals map that is produced for the East Inverness area within the HwLDP reflects fully the master plan for the Beechwood site. The Framework Plan identified at p.17 of the MIR is not reflective of the master plan for the HIE landholding in this area and so should be amended accordingly. Specific observations include the following:

- Landscape/Open Space/Sports - The Landscape Framework which underpins the master plan proposes a large, landscaped area of open space running through the middle of the site managed and maintained for the recreation and enjoyment students, staff and the local community.


The parkland will perform several important functions: providing a high quality environment for education and learning which is attractive to both prospective students and staffs; giving the campus an identity which reflects the Highland context and setting; and also ensuring that campus is fully integrated within the wider proposals for East Inverness by ensuring that the parkland is accessible to the public.

The proposed parkland will therefore be at the heart of the development of East Inverness; meeting the recreational needs of both new and existing residents and also ensuring that the campus is fully integrated within East Inverness. HIE considers the delivery of the campus crucial to the success of both East Inverness and the Highlands.

- Regional Sports Complex - The East Inverness Framework proposed this sports complex to the south of the proposed route of the trunk link road. HIE propose the integration of this within the core campus site to the north of the proposed trunk link road and west of the rail line. Situating the sports complex within the campus is the most efficient and cost effective use of infrastructure. It also facilitates more efficient delivery of public transport services (by jointly serving both facilities), and helps to integrate the campus with surrounding communities by encouraging the public in to the campus site. Accordingly, the HwLDP should reflect this change.
- Business - HIE supports the identification of land east of the retail park and north of the railway line for business uses as set out within the Framework. Situated adjacent to an existing business and retail park and providing good access to the A96, this location is entirely appropriate for business uses. Furthermore development of this site for business uses would facilitate the delivery of physical links from the proposed campus over the railway line to the wider East Inverness development. However, as a result of the master plan work undertaken to-date, HIE considers that the development capacity of this area is greater than originally envisaged within the Framework, and as noted with the floorspace total set out above. Accordingly, the HwLDP should reflect these higher development output figures.
- Residential - As discussed earlier, the Campus Masterplan proposes to locate the Sports Complex within the campus for several functional reasons. As such the area identified in the East Inverness Framework for the sports complex could potentially remain undeveloped. This vacant land would present a significant physical barrier to the integration of the Cradlehall and Westhill with Campus and also the wider East Inverness developments, contrary to the aspirations to deliver a campus which is fully integrated with the existing and new communities of East Inverness, and the objectives of the A96 SPG Smart Growth principles. The allocation of this land for residential development would facilitate the delivery of physical linkages between the campus and the new and existing communities of East Inverness, and we request that this land is therefore allocated for residential within the HwLDP.

We trust these comments are of assistance, however should you wish to discuss these matters further please do not hesitate to contact Jonathan Coulson of this practice.

Yours sincerely



J Coulson

