

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

Reference Number:	HWLDP-MIR-168
Organisation/Individual:	Highlands and Islands Green Party (Myra Carus)

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

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

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

Plan should make greater provisions for climate change and peak oil
Oppose A96 development at Tornagrain
Transport section too heavily weighted to the car

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

Dawn Sutherland

From: Neil Hornsby [REDACTED]
Sent: 06 November 2009 12:16
To: devplans
Subject: HC main issues: H&IGP response

To: The Highland Council Development Plans Team

I attach the Highlands and Islands Branch of the Scottish Green Party's response to The Highland Council's 'Main Issues Report' consultation - seven documents in all, including a covering letter from our Convenor which lists its six attachments. We have previously submitted our response to the housing strategy consultation (but which is also included here), and we will let you have our response to the transport strategy consultation shortly.

Please acknowledge receipt of this email.

I am copying this email (bcc) to my H&IGP colleagues.

Many thanks.

Neil Hornsby
Highlands and Islands Green Party

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

HIGHLANDS AND ISLANDS BRANCH OF THE SCOTTISH GREEN PARTY

To: The Director of Planning and
Development
The Highland Council
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Inverness IV3 5BR

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Rosemarkie
Ross-shire
IV10 8UL

LETTER BY E-MAIL ONLY

6 November 2009

The Director of Planning and Development

Dear Sir/Madam

HIGHLAND -WIDE LOCAL DEVELOPMENT PLAN

I am writing on behalf of the Highlands and Islands Green Party to thank The Highland Council for the opportunity to respond to its Main Issues Report consultation. Our response comprises the following documentation (separate attachments):

- 'Direct' response to Main Issues report's questions (*attached*);
- Annex 1: statement of Highlands and Islands Green Party Sustainable Development Guidelines which we recommend be drawn on and reflected in the overarching structure and content of the Highland-wide local Development Plan and the three area Plans (*attached*);
- Annex 2: our concerns about the A 96 corridor (*attached*);
- Annex 3: our Inverness City Vision response (*attached*);
- Annex 4: our response to the local housing strategy (*previously submitted but also attached*);
- Annex 5: our response to the draft transport strategy (*to follow*);
- Annex 6: our Vision for the Highland and Islands (*attached*)

May I take this opportunity to invite The Highland Council to ensure that the Plans include significantly greater provision for addressing climate change and 'peak oil' than is suggested in the Main Issues report. We note the following extract from the Council's Climate Change Working Group's report CCWG 8/09 (para 5.1.1) that:

"Part 5 of the [Climate Change (Scotland)] Act [2009] contains various other provisions on climate change.....'Requiring planning authorities in any local development plan prepared by them to include policies requiring all developments include greenhouse gas emission policies (Section 72) and that Scottish Ministers report on the operation of this requirement one year after the Section's commencement and annually thereafter;"

Our Sustainable Development Guidelines (annex 1), in particular, were designed in large part to assist with this process.

Yours sincerely

Myra Carus

Myra Carus

Convenor
Highlands and Islands Green Party



SUSTAINABLE DEVELOPMENT GUIDELINES

Recognising the crucial role which the Council has to play in delivering Government policies for sustainability, we recommend that the development plans' provisions draw on clear, prescriptive guidelines for sustainable development. We suggest the following guidelines which are equally weighted and important.

Sustainable development:

- should be designed to maximise energy efficiency and use renewable resources;
- should only produce pollution which can be controlled or neutralised without undue costs to the environment, economy or local and wider society.
- should maintain a balance between human activities and the environment;
- can be supported by existing or projected infrastructure;
- can be supported by the social services, facilities and amenities of the local community;
- should be acceptable to a majority of all persons within that local community.
- to encourage self-sufficiency and self-reliance, development should utilise local materials, labour and expertise wherever possible.

The development plans themselves:

- should be based on the principle of 'accessibility, not mobility' (ie minimising the need to travel, so requiring developments to provide (ideally) the full range of infrastructure facilities within walking distance of residents' homes), and should therefore be configured to support and promote the development of existing communities, including measures to introduce or enhance community facilities;
- should require Sustainable Design Statements to be submitted for all new developments (drawing on the Highland Council's existing 'Designing for Sustainability in the Highlands' guidance), showing how the projects comply with the above seven guidelines.

Following these guidelines, we can suggest some examples of planning outcomes:

- 1. resources:** architectural design should incorporate passive solar energy features if possible, solar water-heating panels and other renewable energy technologies; in recognition of the Highlands' vast potential renewable energy resource, the Council* should initiate a programme to encourage the development of local, small-scale energy schemes, particularly on new housing estates, schools and other public buildings;
- * *see footnote below about Scottish Planning Policy (SPP6) on Renewable Energy*
- 2. pollution:** development should have regard to both the disposal of its sewage and its waste;
- 3. environment:** an industrial development would have to prove that the creation of employment was not at the expense of important local environmental amenities, in particular agricultural land; we need an immediate programme to construct cycle/footpath (only) paths throughout the Highlands, starting in existing communities; the provisions of the Highland Council's 'Open Spaces' and 'Allotments' guidance should be rigorously enforced;
- 4. infrastructure:** current grid capacity around the Highlands is not, at present, capable of meeting even small-scale generation developments and, therefore, has to be upgraded as a matter of urgency; public transport is totally inadequate in most regions of Highland, expansion and improvement of the rail network is required;
- 5. social services, facilities and amenities:** development should only take place where schools, health care, leisure facilities, etc., are readily accessible; we need better Highland-wide library facilities and a swimming pool for the Black Isle; the 'street-scene' of all new residential areas should be designated and built as 'Homezones'.
- 6. democratic control:** community councils should be encouraged to undertake surveys to gauge the popularity of proposed projects;
- 7. local self-reliance and self-sufficiency:** the use of local timber products would be favoured over exotic imported woods.

“TARGETS

36. Development plans should set out local policies on the provision of on-site low carbon and renewable sources of energy in new developments. Policies should ensure that, in all instances, opportunities for incorporating these technologies are fully explored by developers as part of the planning application process. The expectation should be that all future applications proposing development with a total cumulative floor space of 500 sq metres or more should incorporate on-site zero and low carbon equipment contributing at least an extra 15% reduction in CO₂ emissions beyond the 2007 building regulations carbon dioxide emissions standard. The intention is for national targets to increase through the Action Plan that will be prepared to implement the Energy Efficiency and Microgeneration Strategy. In the meantime, the development plan process should be used to consider whether local circumstances justify going beyond 15%; below the 500sq metres threshold; and whether higher standards can be secured for particular developments, including the potential for decentralised energy supply systems based on renewable and low-carbon energy.”

HIGHLANDS AND ISLANDS GREEN PARTY VISION OF A SUSTAINABLE SOCIETY

The Highlands and Islands Green Party is committed to forming a sustainable society. Our vision of such a society is outlined below, and is guided by four interconnected principles. These principles give a holistic view that is in common with all Green Parties around the world.

ECOLOGY

Our environment is the basis upon which every society is formed. Whenever we damage our environment, we damage ourselves. Respect for our environment is therefore essential. More specifically, in a sustainable society:

- the capacity of the environment to provide ecological system integrity, biological diversity and productivity is protected and enhanced;
- substances taken from the earth, in their extraction and use, do not exceed the environment's capacity to disperse, absorb, recycle or otherwise neutralise their harmful effects (to humans and/or the environment);
- similarly, the manufacture and use of artificial substances does not exceed the environment's capacity to disperse, absorb, recycle or otherwise neutralise their harmful effects (to humans and/or the environment);
- all infrastructure, technologies and processes make minimum use of natural resources and maximum use of human innovation and skills.

EQUALITY

A sustainable society is founded on co-operation and respect, and free from discrimination on grounds of gender, race, sexuality, disability, age or religion. Furthermore, people of all ages enjoy a high standard of health, set and achieve high personal standards of their development and learning, and have access to varied and satisfying opportunities for work, personal creativity, and recreation.

RADICAL DEMOCRACY

Politics is too often conducted in a polarised, confrontational atmosphere and in a situation remote from those that it affects. A sustainable society enjoys:

- decentralised participative systems that encourage individuals to control the decisions that affect their own lives.
- trusted and accessible systems of governance and justice.
- communities and society at large sharing key positive values and a sense of purpose.
- the structures and institutions of society promoting stewardship of natural resources and development of people.
- homes, communities and society at large providing safe, supportive living and working environments.

PEACE AND NON-VIOLENCE

Violence at all levels of human interaction is rejected and succeeded by relations characterised by flexibility, respect and fairness.

Drawing up a Housing Strategy for the Highlands – Your Views

A' dealbh Roi-Innleachd Taigheadais airson - Ur Beachdan

Please give us your views and comments on these issues and our proposed approaches.

We are happy to accept responses from individuals, community councils etc.

Please return this form to the address below by the **end of October 2009**.

You can also access a copy of this survey, and fill it in, on-line at:

www.highland.gov.uk/highlandhousingstrategy

1. Where should new affordable houses be getting built and what should they be?

What are your views on this issue and the preferred options we set out on page 5? Should we be doing something else? If so, what?

A. We do not entirely support the preferred option. Specifically we support bullet point 1. At bullet point 2 we do not think the Council should be building any low-cost private housing only social rented housing. At bullet point 3 we think the Right to Buy should be suspended everywhere. Bullet point 4 is inarguable but it should be extended to providing innovative designs for sustainable living, such as energy efficiency, passive solar energy and renewable energy systems. In addition to the above, new rentable housing needs to be built within communities, having access to required infrastructure and facilities such as education, health care, shops, public transport, etc.

2. Who should we be building houses for?

What are your views on this issue and the preferred options we set out on page 5? Should we be doing something else? If so, what?

A. We think rentable housing should be provided for local people first and foremost. We are concerned about who will define the criteria for outside allocation and what that criteria should be. How do you distinguish between the need for an incoming nurse and a single-parent unemployed family?

3. How can we best meet the increase in people with community care needs?

What are your views on this issue and the preferred options we set out on page 5? Should we be doing something else? If so, what?

A. We support the preferred option. However, we think there will still be a need to provide specialised housing for some people who cannot be cared for at home.

4. How can we make sure all our Council houses meet the standard set by the Government?

What are your views on this issue and the preferred options we set out on page 5? Should we be doing something else? If so, what?

A. We support the preferred option. It is particularly important that housing standards promote energy conservation to avoid the problems of fuel poverty.

5. How can we help private owners repair and improving their housing?

What are your views on this issue and the preferred options we set out on page 5? Should we be doing something else? If so, what?

A. We support the preferred option. At bullet point 1, we think the Council has a responsibility to give advice to private home owners on improvements and repairs which will aid energy conservation or energy production. We think the Council should be making a case with central government to remove VAT from house repairs. At bullet point 2, we agree that across-the-board grants should no longer be available but it is essential that low-income households are supported and special health and safety issues are addressed.

6. Our Housing Strategy has been in place since 2003. Is there anything which we, or other housing related organisations, should be doing differently? Please tell us. Please also tell us what you think we should be doing instead.

A. It is essential that the priority for the Council is on providing public rentable housing for those who are in most need.

7. What other housing related issues do you think we (and / or our housing partners) should be dealing with? There is a list of other housing issues on page 6 – you may find it helpful to look at this.

Please give us your views including what you think we should be doing.

A. The problem of non-rentable holiday/second homes needs to be addressed. This could be by introducing a higher Council Tax for them and the Council should make representations to central government to this effect. Planning for new housing should ensure residential qualifications, particularly where the land is being taken out of crofting tenure. The Council has a responsibility to ensure that it does not encourage any measures which will contribute to an increase in house prices, the main reason why young and low-income people are unable to afford houses.

8. About you (this will help us understand where the different housing issues are)

a) Name (optional) or Organisation you represent

Highlands and Islands Green party.

b) Community / Area you live in or represent Highland

Returning Your Completed Survey

Please tear off this form and return it to **The Highland Council, Housing & Property Services, FREEPOST SCO2032, Inverness, IV3 5BR.**

You can also hand it into any Council Service Point or Housing Office and they will send it on. Alternatively you can email your views to: housingandproperty@highland.gov.uk

HIGHLANDS AND ISLANDS BRANCH OF THE SCOTTISH GREEN PARTY

Highland Wide Local Development Plan – Main Issues Report; Highlands and Islands Green Party Response

National Planning Framework

Although, as national planning issues, these are outwith the remit of Highland Council, we disagree with some of the emphasis and priority.

1. Development of the A96 corridor and the expansion of Fort William as envisaged in the report should not be prioritised.
2. Development of renewable energy should be encouraged throughout the Highlands, together with the necessary infrastructure and the development of Nigg Bay as a centre for building wind and marine turbines and associated engineering.
3. Appropriate development of sustainable industry should take place throughout the Highlands.
4. There needs to be an emphasis on protecting and developing agricultural land for a self-sufficient future.
5. The importance of public transport, as against private motor transport, needs to be emphasised.

The Vision for the Highlands

Despite talking about 'sustainable Highland communities', aside from protecting and developing renewable resources and reducing private travel, the vision does not address the important factors which will increase sustainability. If Highland population is to grow, it will have to work towards self-sufficiency in basic food and necessary resources. We suggest:

- Environment: combining the third and fourth bullets to read: "To put in place the planning framework to help Highland take the lead in reducing the amount of carbon dioxide released into the air, adapt to the effects of climate change and limit the amount of development which uses non-renewable resources; and also to deliver the sustainable waste management proposals set out in the Council's waste strategy and brought forward by the private sector."
- Economy: the first bullet point on P5 should read "To provide opportunities which encourage development of sustainable industries and create new employment throughout the area, whilst at the same time improving the strategic infrastructure necessary to allow the economy to stabilise over the long term".

Where should growth go etc.: Inverness and A96 section

We broadly welcome measures to improve the quality of life in Inverness (see also annex 3). However, we fundamentally object to the principle of developing the A96 corridor as a policy aim, and including the East Inverness and Tornagraim areas. We also oppose the proposed A9-A96 link Road.

We question the assertion that 'the continued growth and development of Inverness and the surrounding area is essential so that the Highlands can continue to prosper'. No evidence is given in the report to support this assertion, and we recommend it be dropped as a planning assumption in the development plans.

Responses to specific questions

Q1. We are broadly in favour of the preferred option except for the link of the master plan to the proposed development of the A96 corridor. The Beechwood campus should be provided with a station.

Q2. We oppose the development of the A96 corridor. Rather, we believe that it is more important to develop small-scale local industries throughout the Highlands consistent with a sustainable future. Almost the whole area is on prime agricultural land and therefore unsuitable for housing or industrial development. We favour alternative option 2 (but not 1) on condition that the development of 'other communities' be Highland-wide and not restricted to other sites around the Moray Firth. If the development does go ahead, we recommend that new local stations should be opened up on the railway line, serviced by frequent, small trains.

Q3. We do not agree with the preferred option, nor the alternative because we see no need for an A96-specific proposal. See our response to Q18 for our more substantive view on developer contributions.

Q4. We oppose the preferred option and the suggested alternative (what is the basis of the statement 'levels of growth needed?') Please see annex 2. for our specific objections. We do however favour the establishment of a rail station on the Beechwood campus which, if the scheme goes ahead, would provide useful 'Park & Ride' facilities.

NB We are deeply concerned about the proposed provision of only 13 ha of 'Open Space'. On the basis of the Council's own Guidance provision of 40 sq.m. per person, a development of 7,250 people should warrant Open Space of at least 28 ha.

Q5. We oppose the preferred option but like the alternative.

Q6. We oppose the Tornagrain development for the reasons set out in annex 2.

Q7. We support the preferred option, provided it is decoupled from the A96 corridor proposals, and that the villages are treated no differently to other existing communities across the Highlands.

Q8. We support the preferred option, which should be widened to encourage the development of appropriate sites for wind-power.

Q9. We support the option with particular emphasis on developing marine energy engineering and the building of wind turbines.

Q10. We agree to the first bullet point but we do not understand the implications of a 'settlement hierarchy'. We think that good agricultural land should not be used for housing.

Q11. The policy approach is inadequate and contains no suggestions for the development of sustainable communities. The emphasis should be on developing local industries which use local resources and renewable energy and employ local people.

Q12. We strongly disagree with the preferred option, not least because it incorporates no specific 'action points'. A growth in population in Highland cannot be sustained by the current resources and infrastructure and is unlikely to continue. If Highland is to progress it must be by policies and strategies which encourage the growth of 'sustainability' rather than economic growth. We prefer an alternative based on a lower population growth. The table on P34 is uninformative and misleading as it does not show the proportion allocated to social and affordable housing. It does not show the units being used. There should be a table showing the situation under a low migration scenario.

Q13. We agree with the preferred option. However, the Council should be encouraging the development of Transition Towns. The Housing in the Countryside Design Guide has to emphasize energy efficiency, low energy and renewable energy schemes, use of local, sustainable, low carbon building materials. Each housing area has to be supported by an infrastructure including, sewage, water, transport, shops, education, health facilities and local food production, and where possible local energy production.

Q14. We are broadly in favour of the option except that the 25% affordable housing should be on sites of four or more houses even where there is no evidence of need. The Council must find ways to finance and build a new stock of social housing and stop the sale of social housing. It should also find means to discourage the number of holiday/not rentable houses in the area.

Q15. We agree with the preferred option but like the idea of purpose-built semi sheltered accommodation.

Q16. We agree but also suggest that Community Councils ask their areas to identify suitable sites for travellers. If this consultation is not done, the policy will be very unpopular.

Q17. We advocate a combination of the strategy options (ie directing retail development to specific sites) by supporting town centres and local retail facilities but also using alternative 2.

Q18. We consider that there should be one developer contribution protocol covering the whole of the Highlands. We wholeheartedly endorse the Report's recognition that developments may well have external impacts, and that the protocol should be drawn up to address that concern. The preferred option, which in principle we support, should be amplified to reflect this external impact issue.

Q19. We agree with the preferred option.

Q20. We agree with the preferred option.

Q21. We agree with the preferred option, however, we think it will be very important how 'wild land' is defined. It could really only be land which has no signs of previous human occupation or use. Land which once supported communities could do so again. It is also important to weight in favour of any renewable energy schemes.

Q22. We do not agree with the preferred option as SEPA has the expertise on these issues and should be consulted in all cases. We therefore prefer the alternative option.

Q23. We support the preferred option and totally oppose the alternative. However, as to bullet point 3, there have to be well-evidenced reasons for protecting areas. National or international natural heritage value has to be set against the need for local communities to develop self-sufficiency in energy provision. The people living in the 'Areas for Significant Protection' shown on the map on p50, should have the final say on whether large-scale renewable energy should be developed in their area.

Q24. We prefer the more prescriptive policy of the alternative. We do not believe it would limit flood protection schemes.

Q25. We partially agree with the preferred option but think it can be combined with the alternative. We oppose energy from incineration but methane collection may be acceptable. What is most important is that the Council provide door-step collection of recyclable waste and encourage the development of local recycling industries, eg compost, from waste.

Q26. We agree with the preferred option.

Q27. We agree with the preferred option and think that this is a crucial area for development and deserves more detailed and expanded guidelines. Most importantly is a need for supplementary guidance to include a mandatory requirement for planning applications to include sustainable design provisions. We also think it is important to have a bullet point specifically to 'implement Scottish Government planning guidelines on the development of micro-generation systems.

Q28A. We support the preferred option, although major inward investment should not be courted at the expense of indigenous industries.

Q28B. We oppose most of the policy statements on the grounds that they are heavily weighted towards motor transport. Bullet point 4 is the most important issue and inconsistent with an increase in road traffic. Amongst the bullet points on p60, we strongly support only 1,4,5,6 (omitting the reference to 'air') and particularly 8, with an inclusion of other forms of waterways. In the preferred option bullet point 5 needs to specifically refer to the implementation of Scottish Government proposals to ensure that rural fuel stations provide electrical charging points for electric vehicles. We suggest that the Park and Ride scheme needs to connect with an efficient, frequent, round-city bus system. Cities and towns could provide a fleet of hire cycles with drop-off points throughout the city. We notice that the main investment is in road transport but the money would be better spent in building new railways and waterway routes for freight and opening up more stations on the existing railways.

What is an Active Travel Masterplan Location?

Q29. We support the alternative option as we believe all potential agricultural land should be protected from any development which takes it out of agriculture permanently and is not essential to the sustainability of the community.

Q30. We support bullet points 1 and 3 but not 2 as it is unnecessarily bureaucratic. The Crofting Commission can assess this. We do not agree with the alternative. As agriculture develops there will be more need for houses for agricultural workers, so it is important not to make a general prohibition on house building on crofts.

Q31. We support the preferred option with reservations and do not understand the alternative – does it mean that in-by land should not be protected? This is an important and delicate issue as apportionment and common grazing land may be needed in future for agriculture. It is the nature of the development which is important eg. development of poly-tunnels heated by renewable energy, or community woodland growing fuels, would be beneficial - housing would not be.

Q32. We support the preferred option. It is important to recognise that the development of sustainable, self-sufficient local townships will require the growth of local resource-using industries which might have to be built on common grazings.

Q33. We support the preferred option.

Q34. We support the preferred option but we also support the alternative which we see not so much as an alternative as a supplement.

Q35. We support the preferred option.

Q36. We support the preferred option.

Q37. We support the preferred option.

Q38. We support the preferred option.

A96 CORRIDOR

We wholly oppose the concept of designating the corridor as an 'area for co-ordinated action'. Rather, we believe that it is far more important to develop existing communities and small-scale local industries throughout the Highlands consistent with a sustainable future.

Our principal concerns are that:

- the huge additional population in the corridor, and so close to Inverness, will drain other parts of the Highlands – and possibly the Islands as well – of population, jobs and infrastructure investment; and following on from this:
- that, at a time when the Highland Council is preparing its Climate Change Strategy and which must include as a principal aim a reduction in road traffic, the proposal's centralising effect will lead to proportionately greater road traffic (and related more severe congestion), principally because increasingly more people outwith Inverness will travel to the retail, commercial and industrial facilities in the A96 corridor.
- developing the corridor would result in the loss of a sizeable area of good agricultural land.
- the proposed public expenditure of almost £40m for A96 corridor-related funding would be far more cost-effectively spent on more sustainable transport-related public projects in servicing existing communities, including Homezones, cycleways, 'safer routes to school' and a fully integrated and improved bus and rail network.

The Highlands and Islands Branch of the Scottish Green Party

