

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

Reference Number:	HWLDP-MIR-275
Organisation/Individual:	

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	
NPF 2 for Scotland	
Vision for the Highlands	x
Inverness and A96	
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
Tomagrain	
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	x
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	x
Natural Built and Cultural Heritage	

Previously used Land	
Wild Land	x
Water Environment	
Renewable Energy	x
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	x
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:

Unconvinced by need for siting and design guidance for Housing in the Countryside
 Developer Contributions need to be set against circumstance
 Energy projects and wild lands can harmoniously co-exist
 Fully supports approach to renewable energy development
 New guidance and policy of forestry should be in alignment with Scottish Government's objective of creating 10000 ha of new woodlands per year

Action Sheet Completed by:	SH
Date:	14/12/09

Response to the Highland wide Local Development Plan

is grateful for the opportunity to comment on the Highland Council's Highland wide Local Development Plan. would like our response to be publicly available but asks that it remain anonymous.

has been established to invest in renewable energy production and distribution, and sustainable forestry in Scotland. will produce heat and electricity from renewable energy plants by using its forests as renewable energy platforms.

Main message for the Highland Council

fully supports the plan objectives stated in the 'Vision for the Highlands' (p.4): *"To ensure that development of renewable energy resources are managed effectively with a clear guidance on where renewable energy developments should be located"*.

The current approval process for renewable energy projects does not deliver the required transparency and certainty for investors which results in an overwhelming majority of projects being refused, putting in peril the Scottish Executives' renewable energy targets. A clear view of where renewable energy projects are desirable will give developers the visibility to invest in suitable locations.

Consultation Response

Housing in the countryside (p.36)

does not support the first Preferred Option which is *"identify areas of development pressure in the countryside"*. As much as possible, new developments should occur where they are required as the needs of the population evolve and as suitable sites are identified by developers.

is of the opinion that there planning permission should not be granted for new houses in the countryside whose energy needs are not supplied part or in whole by renewable energy sources. Ideally, all new developments, whether in the countryside or in cities, should only be granted planning permission if they include a source of renewable energy to satisfy the energy consumption.

does not fully understand the potential benefits of a Housing and Countryside Design Guide to provide added guidance for housing in the countryside. As a result, is unconvinced by the need for such a document.

Developer contributions (p.43)

The stated Preferred Options regarding developer contribution indicates that the Plan will seek to *"bring forward a consistent, transparent method of collection and recording these contributions across the Highlands"*.

does not support this proposal on the grounds that each project and each community have different needs and should be allowed to determine freely how a contribution can best achieve the projects of communities located around a new renewable development.

Wild Land (p.47)

The stated Preferred Options regarding wild land state that the Plan will *"identify areas of wild land and include these as a development constraint"*.

is uncomfortable with the assumption that renewable energy projects cannot be located on 'wild land'. Experience has shown that renewable energy projects and 'wild land' do harmoniously co-exist.

Renewable energy (p.49)

fully supports the Preferred Options regarding renewable energy development. Specifically, we support the second bullet point which states that the Highland wide Local Development Plan will “*identify broad areas of search where different types of renewable energy technology developments ... could take place*”.

The current situation, which is defined by a lengthy and disputed planning permission process, is not satisfactory for investors, developers or the Scottish Executive. Currently, the majority of renewable projects fail to receive planning permission for want of specific guidance on where it is appropriate to develop renewable energy projects. Not only is this an issue for investors which need transparency and certainty in the approval process but this could threaten the progress towards Scotland’s renewable energy targets. Developers are eager to focus on the areas identified as suitable by the Highland Council; this would save all parties involved in the approval process much time and energy. One of the impediments to investing in renewable energy projects is the proportionally large amount of capital required to finance and submit a planning application. Defining which locations are appropriate for renewable energy projects will increase certainty and reduce the risk taken by investors resulting in, not only the development of projects in suitable locations, but also increased investment overall in renewable energy projects.

— would like to suggest that the Highland Council identify areas that are ‘suitable’, ‘unsuitable’ and ‘potential’ locations for renewable energy projects. In light of the national renewable energy targets, ‘suitable’ locations should cover an area at least as large as ‘unsuitable’ locations.

Finally, — would like its opposition to the alternative to the Preferred Option to be noted: we do not support the possibility that renewable energy developments may be allowed solely in areas where there is sufficient grid capacity.

The grid was designed at a time when the value of renewables was not well understood, its location should not determine the potential for renewable energy. The UK and Scotland are working together to increase grid capacity to support the development of renewables; it is not envisaged that the grid should continue to be a constraint for renewables. Furthermore, placing such a constraint would eliminate numerous renewable energy projects in Scotland which is contrary to the Scottish renewable energy and emissions reduction targets.

Forestry and woodlands (p.69)

would like to state that any new guidance on forestry should be in perfect alignment with the Scottish Executives’ objective of creating 10,000 hectares of new woodlands per year.

To achieve this ambitious national target, — does not support the Highland wide Local Development Plan proposal that new guidance should be provided on tree protection and woodland cover for new developments. — is of the opinion that tree species and location of forests should be decided on a case-by-case basis. Any guidance could result in new woodlands not being created which would put in peril the achievement of the national woodland creation target.