

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

Reference Number:	<b>HWLDP-MIR-62</b>
Organisation/Individual:	Halliday Fraser Munro Planning – Deveron Highland Ltd

### Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	x
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		Wild Land	
Vision for the Highlands		Water Environment	
Inverness and A96	x	Renewable Energy	
The A96 Corridor	x	Flooding	
Phasing of Development		Waste Management	
Developer Contributions	x	Air Quality	
East Inverness		Sustainable Design	
Nairn	x	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	x	Coastal Development	
Housing in the Countryside		Forestry and Woodland	
Affordable Housing	x	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	x	Comments on Consultation Process (-ve)	
Natural, Built and Cultural Heritage			

### Key:

<b>Background</b>	<b>Spatial Strategy</b>	<b>Policy Options</b>	<b>Consultation</b>
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### Notes:

Comments regarding housing land supply – specifically Sandown, Nairn: issue for Inner Moray Firth LDP

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

<b>H.C. PLANNING AND DEVELOPMENT SERVICE</b>		
<b>29 OCT 2009</b>		
<b>PASS TO</b>	<b>INITIALS</b>	<b>DATE</b>
MM		
<b>FILE REF:</b>		

**HIGHLAND WIDE LOCAL  
DEVELOPMENT PLAN –  
MAIN ISSUES REPORT**

**SANDOWN, NAIRN**

OCTOBER 2009

On behalf of Deveron Highland Ltd



**HALLIDAY | FRASER | MUNRO**  
PLANNING

HALLIDAY FRASER MUNRO  
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Our Ref: P1180/HS

28 October 2009

Director of Planning and Development  
The Highland Council  
Freeport SC05568  
INVERNESS  
IV3 5BR

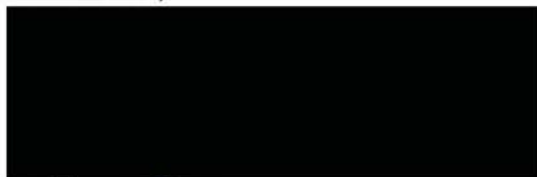


Dear Sir

**HIGHLAND WIDE LOCAL DEVELOPMENT PLAN- MAIN ISSUES REPORT**

Please find enclosed a representation to the Highland Wide Local development Plan Main Issues Report on behalf of Deveron Highland Ltd. Should you wish to discuss any aspect of this representation please do not hesitate to contact me.

Yours faithfully



**Hazel Sears**  
For HALLIDAY FRASER MUNRO PLANNING

OFFICES IN ABERDEEN  
BELFAST, DUNDEE  
AND GLASGOW

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## HIGHLAND WIDE LOCAL DEVELOPMENT PLAN- MAIN ISSUES REPORT

### RESPONSE FROM DEVERON HIGHLAND LTD

#### INITIAL COMMENTS

The document is unclear as to the Council's preferred Option in relation to development in Highland Region as a whole. It would have been more logical to identify the housing requirement, as stated in Chapter 5, at the start of the Report and then provide options/ suggestions as to where this development should be located. The level of housing need and consequently the amount of development required should be identified at an early stage.

#### QUESTION 1- INVERNESS

Question 1 implies that development in Inverness should take precedence over any housing growth elsewhere. This approach is not in accordance with Government policy in SPP3, which stresses the importance of variety and choice in location and house type. It is also contrary to NPF2, which as highlighted in the MIR acknowledges the potential of the A96 Corridor.

This Option could potentially also not meet demand within other Housing Market Areas as identified in the Council's Housing Need and Demand Assessment Consultation Draft 2009. In Nairn this amounts to a land requirement of 1631 units between 2010-2019.

**The Preferred Option** should therefore be to identify a number of geographical areas where development should be located to meet housing need. Whilst Inverness has recently been the major driver for economic growth for Highland, there is a need to focus on other locations to provide choice. Such an approach will also relieve infrastructure pressure specifically relating to traffic growth and congestion within the City, which are unlikely to be resolved for some considerable time.

#### QUESTION 2 – A96 CORRIDOR

The MIR preferred Option is to support all developments, which have been identified in the A96 Corridor Framework. However this approach effectively accepts that all sites are at a comparable stage of being delivered. Some sites, specifically Sandown at Nairn are already allocated in an adopted Local Plan and as the Council states should therefore have priority in terms of timeframes. As an existing allocation, designated before the A96 Corridor Framework was produced, this site should also be exempt from the major infrastructure improvements suggested in the Corridor Framework and now continued in the MIR.

**The Preferred Option** should be to honour existing commitments in the A96 Corridor and support such development without the completion of major infrastructure.

### **QUESTION 3- DEVELOPER CONTRIBUTIONS IN THE A96 CORRIDOR**

The MIR suggests that all sites identified in the A96 Corridor should be liable for developer contributions and that these should be subject to a protocol.

This approach does not take account of sites, which although lying within the Corridor area are allocations in existing Local Plans. As such they should not be subject to any specific additional requirements which have not been already identified in an adopted local plan in relation to their prospective development.

The downturn in the housing market has also had repercussions on how long it will take some sites to come forward. It may very well be that, if comparable contributions are sought from all developments, regardless of when they are likely to be built, early developments will bear the infrastructure costs of those, which although programmed, are nevertheless unlikely to proceed within the near/ medium future. This would be inequitable and has been highlighted in regard to objections to the proposed levy system in England.

**The Preferred Option** in cases such as Sandown at Nairn should be flexibility and consideration on a case by case basis.

### **QUESTION 5- NAIRN**

The subsection relating to Nairn gives details of the A96 Corridor suggested site allocations, although these figures do not correspond in any way to the Housing Land requirements set out in Chapter 5 i.e. 4629 units identified in the former compared to 1631 units (page 34). An explanation is needed to address this apparent discrepancy.

The Council's Option suggests that existing Local Plan sites such as Sandown are carried forward as priority areas for development in the new Plan. This approach is strongly supported in principle, as the site can be delivered without costly infrastructure requirements such as the Nairn by-pass, which as the Council concedes is 'likely to be some years away'. Sandown is also immediately effective and this is an important consideration in the delivery of housing to meet identified residential shortfalls. The Council accepts that just because a site is allocated its development may not be guaranteed.

It is however argued that circumstances have changed considerably since the original allocation of the land some 10 years ago. Specifically, Government policy and advice contained in PAN 67 and PAN 76 in relation to the form of new development advocate the principles of good design whilst reducing wasteful land take and providing sustainable quality living environments. In the main this is to re-dress the inadequacies of recent modern developments, which to a large extent require servicing by car and do not reflect local vernacular materials or building form. Built at low densities such developments are also wasteful of greenfield land.

The MIR does not give any indication of numbers or density relating to this site, or indeed any other proposed developments within the Highland area or A96 Corridor. It does however require all new developments to complement Nairn. The A96 Framework includes a breakdown of the types of development, which should be built. In this respect approximately 33% are to be high density, 62% medium and only 5% should be low. This approach to new housing development is strongly in line with

Government philosophy, which is also to some extent reflected in the Highland Structure Plan.

Provision of a wide range of attractive accommodation also accords with the Council's Vision for the Highlands in the MIR which is to meet the needs of the whole community whilst taking full account of Highland's ageing population. The Vision advocates development of mixed communities.

There is a need to provide for 4629 units, or at least 1631 units, in Nairn between 2010-2019. However with only 868 effective sites as of 2007 it is essential that land be delivered as soon as possible particularly to help meet the shortfall of affordable housing provision identified in the Plan.

It is apparent that, by increasing numbers on allocated sites, not only will more units be delivered early to meet current shortfalls but that also there will be a reduced requirement for greenfield land take.

**The Preferred Option** is to concentrate development on identified sites but to advocate and approve housing densities, which accord with recent Government policy and advice. Such an approach may also reduce the need to allocate all the land currently proposed for allocation.

#### **QUESTION 12- HOUSING LAND REQUIREMENT AND SUPPLY**

As detailed in response to Question 1 above, it would have been more logical to address the housing land requirement before identifying options as to where new development should take place. It is also regrettable that the most recent Council Housing Land Audit is dated 2007 and that an update is not programmed until at least the middle of 2010. It is therefore difficult to assess the current accuracy of the land requirement.

**The Preferred Option** of a positive approach to the delivery of effective allocated housing land to meet high projected population and housing growth is strongly supported. Specifically in terms of Nairn, there is a 'clearly identifiable deficit in the existing land supply' both currently and "in the following 10 year period."

#### **QUESTION 14- AFFORDABLE HOUSING**

The MIR proposes that growth should take place in the Inner Moray Firth Area and concentrates this in Inverness and at a later date larger sites in the A96 Corridor. The MIR also identifies that there is an acute shortage of affordable housing across large areas of Highland. The Housing Need and Demand Assessment states that social rented housing in Highland at around 18% is far lower than the Scottish average of around 25%. In Nairn this only amounts to 14-16% of the housing stock.

In support of the responses to Questions 1 and 2 land release in Nairn at higher density will increase affordable housing stock. Development of mixed units will also provide for a full range of need. The Housing Needs Assessment highlights that most dwellings in the Highlands tend to be fairly large and detached with very few flatted units and yet "there is a large excess need for small (1 bedroom) social rented accommodation".

**The Preferred Option** is to encourage a full range of affordable housing on sites where it can be accommodated either through subsidy from Housing Associations or can realistically be provided by a developer.

#### **QUESTION 18 – DEVELOPER CONTRIBUTIONS**

Whilst the requirement for developer contributions has become more widespread in recent years, these have been raised against the backdrop of a buoyant housing market. As already stated in response to Question 3, the continuation of this approach now has to be tempered with caution particularly in the current economic climate and financial restraint. It is also critically important that any conditions/ contributions are fair and transparent and strictly relate to the development of a site as stated in Circular 4/98.

In addition sites which are already allocated in adopted Local Plans and which are now several years old, should not have contributions imposed retrospectively. Specifically they should also not be caught up in more recent suggestions relating to the A96 Protocol.

In effect if onerous contributions are demanded sites will not come forward and the housing land requirement will not be met with consequent 'knock on' effects for the delivery of affordable housing.

**The Preferred Option** is to currently take a realistic approach to developer contributions to enable developments to proceed.

*Halliday Fraser Munro*  
*October 2009*

