

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

Reference Number:	HWLDP-MIR-265
Organisation/Individual:	Diana Buchanan

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:

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

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

<p>Needs to be enforcement of Developer contributions Infrastructure should be funded prior to permitting of development Oppose Tornagrain Settlement hierarchy needs clarity Developer contributions need to be addressed case by case Compromise of protected sites may be possible through preferred option Need stronger commitment to public transport Need to protect more than just prime agricultural land High degree of reliance on developers for funding of infrastructure Not possible to provide truly local employment</p>
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Action Sheet Completed by:	SH
Date:	14/12/09

Highland wide Local Development Plan Main Issues Report

Questionnaire

Please fill in this questionnaire. Your views are extremely important to us and we will take them into consideration when preparing the proposed plan.

If you would prefer you can answer only the questions on the issues that you are interested in. If you have any general comments, please put them in the box on page 12.

Please fill in your details below so we can keep you up to date with the progress of the Highland wide Local Development Plan.

Name DIANA BUCHANAN
 Address DARROSS CASTLE
By Croy
Inverness

Postcode IV25PK
 Phone
 Email

H.C. PLANNING AND DEVELOPMENT SERVICE		
12 NOV 2009		
You can respond via e-mail:		
PASS TO	INITIALS	DATE
<u>MM</u>		
FILE REF:		

Fax:
 Post: Director of Planning and Development
 The Highland Council
 Freepost SCO 5568
 Inverness
 IV3 5BR

This form can also be filled in online at <http://www.highland.gov.uk/developmentplans>

**This Questionnaire must be returned by
 5pm Monday 9th November, 2009**

SPATIAL STRATEGY

Please tick one box

Spatial Strategy: Inverness

- Q1 Do you agree with our Preferred Option? If not, tell us why
 Do you prefer the stated alternative?
 Are there any other alternatives that should be considered?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments *The boundaries of what you consider Inverness are unclear. Great effort must be made to reduce urban creep. For instance, The Culloden area must maintain its remaining woodland + fields as much as possible*
continue on a separate sheet if you need to

Spatial Strategy: A96 Corridor

- Q2 Do you agree with our Preferred Option? If not, tell us why
 Do you prefer the stated alternative?
 Are there any other alternatives that should be considered?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments *See separate sheet*

continue on a separate sheet if you need to

Developer Contributions in the A96 Corridor

- Q3 Do you agree with our Preferred Option? If not, tell us why
 Do you prefer the stated alternative?
 Are there any other alternatives that should be considered?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments *Preferred Option*
 1. Provides no way to enforce developer compliance. No budget for enforcement
 2. Enforcement will be case by case. Standards must be, if to be specific enough to work
 3. See ~~see~~ separate sheet
continue on a separate sheet if you need to

East Inverness in the A96 Corridor

- Q4 Do you agree with our Preferred Option? If not, tell us why
 Do you prefer the stated alternative?
 Are there any other alternatives that should be considered?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments *1. Folly to permit development before infrastructure fully debated & funded and before infrastructure put on specific work schedule*
 2. Area proposed is extensive. Need agreed limits on urban creep
continue on a separate sheet if you need to

Nairn in the A96 Corridor

Q5 Do you agree with our Preferred Option? If not, tell us why
Do you prefer the stated alternative?
Are there any other alternatives that should be considered?

Yes No

Comments Not sufficiently familiar with the sites that would be included in P.O. but not stated alternative in principle. believe that tactical expansion of infrastructure (road + public transport) around Nairn would make sense
continue on a separate sheet if you need to

Tornagrain in the A96 Corridor

Q6 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments very strongly oppose
see additional comments on separate sheets
continue on a separate sheet if you need to

Smaller Settlements in the A96 Corridor

Q7 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments
continue on a separate sheet if you need to

Action Plan for Caithness and North Sutherland

Q8 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments *Rather vague ?*

continue on a separate sheet if you need to

Action Plan for Nigg and Easter Ross

Q9 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments *Not sufficiently familiar w/ area*

continue on a separate sheet if you need to

Development of Local Centres

Q10 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments *What do you mean by
Settlement hierarchy?*

continue on a separate sheet if you need to

The Wider Countryside and Fragile Areas

Q11 Do you agree with our Preferred Option? If not, tell us why
Are there any other alternatives that should be considered?

Yes No

Comments *Your Preferred Option is so
vaguely worded that cannot comment
to extent that supports housing development
in fragile areas*

continue on a separate sheet if you need to

*That need environmental or amenity protection,
oppose.*

SUSTAINABLE HIGHLANDS

Population and Housing requirement

Yes No

Q12 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

See attached

continue on a separate sheet if you need to

Housing in the Countryside

Yes No

Q13 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

See Attached

continue on a separate sheet if you need to

Affordable Housing

Yes No

Q14 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

See attached

continue on a separate sheet if you need to

Planning for an Ageing Population

Yes No

Q15 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

continue on a separate sheet if you need to

Needs of Gypsies / Travellers

Yes No

Q16 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments *By definition, you will need to look at case by case in order to evaluate specific sites. Unwise to decide a priori that you will allow x number. However do need a policy re the*
continue on a separate sheet if you need to

Retailing

Criteria for permissions + enforcement against unauthorized sites or sites breaching terms

Yes No

Q17 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments *Your alternative 2 is probably more effective as means of ensuring town centre + local retail survival, against developer pressure*
continue on a separate sheet if you need to

Developer Contributions

Yes No

Q18 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments *Developers should be made to contribute but if you do not evaluate case by case, they will manipulate the rules more easily. You need a budget a*
continue on a separate sheet if you need to

enforcement apparatus - otherwise they will simply tire you out the Council: costs of litigation will be high + developers will know that Council therefore has incentive to turn blind eye. Specific, individualized requirements will be more difficult to evade, though still will require economic + political will to enforce

SAFEGUARDING OUR ENVIRONMENT

Natural, Built and Cultural Heritage

Q19 Do you agree with our Preferred Option? If not, tell us why

Yes No

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments *Generally agree w/ P.O. but need stronger protection standard*
However, you need to define "address" -
at what point do you prevent developers
from doing what they want - P.O. leaves
it open to permit compromise of sites so long as
developer is asked to "address" - leaving protection to developer?
continue on a separate sheet if you need to

Previously Used Land

Yes No

Q20 Do you agree with our Preferred Option? If not, tell us why

Are there any other alternatives that should be considered?

Comments *Does not include policy re*
what kinds of new use to be permitted -
a flooded field should not be transformable
into factory or housing development
continue on a separate sheet if you need to

Wild Land

Yes No

Q21 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments *What do you mean by "take into*
account" - you need a stronger statement
of protection standard (your water
Environment PO is much stronger)
continue on a separate sheet if you need to

Water Environment

Yes No

Q22 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments
continue on a separate sheet if you need to

SUSTAINABLE DEVELOPMENT AND CLIMATE CHANGE

Renewable Energy

Yes No

Q23 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

continue on a separate sheet if you need to

Flooding

Yes No

Q24 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

Your caveat implies that the chief benefit of PO is to make developers pay for draining. However, your PO leaves the risk attendant to developers, who have economic incentive to under estimate risk and remedial actions needed.

continue on a separate sheet if you need to

Waste Management

Yes No

Q25 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

By definition, if you rely on developer for waste solutions, such solutions won't be ready before the development is done and you are at developers' mercy a less likely to be responsible to community input.

continue on a separate sheet if you need to

Air Quality

Yes No

Q26 Do you agree with our Preferred Option? If not, tell us why

Are there any other alternatives that should be considered?

Comments

continue on a separate sheet if you need to

Sustainable Design

Yes No

Q27 Do you agree with our Preferred Option? If not, tell us why

Are there any other alternatives that should be considered?

Comments

continue on a separate sheet if you need to

Allocation of inbye land

Yes No

Q31 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

Don't know

continue on a separate sheet if you need to

New Crofting Township

Yes No

Q32 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

Don't know

continue on a separate sheet if you need to

Small Scale New Crofts

Yes No

Q33 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

Don't know

continue on a separate sheet if you need to

Coastal Development

Yes No

Q34 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments

Alternative necessary that would identify areas sensitive for science, ecological or environmental receptors beyond aquaculture - eg industrial or dens housing or

continue on a separate sheet if you need to

use producing extensive pesticide/fertilizer run-off

COMPETITIVE, SUSTAINABLE & ADAPTABLE HIGHLAND ECONOMY

Business and Industrial Land

Q28A Do you agree with our Preferred Option? If not, tell us why

Yes No

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments P.O. does not contain specific standards for defining "right" location. You stated alternatives could be modified so as to allow building of new housing as part of business development but not new large scale business/industrial development intention on existing business/industrial residential or agricultural use lands
 continue on a separate sheet if you need to

Accessibility and Transport

Q28B Do you agree with our Preferred Option? If not, tell us why

Yes No

Are there any other alternatives that should be considered?

Comments OMITS COMMITMENT TO IMPROVE PUBLIC TRANSPORT (as local transport strategy apparently only seeks to "identify" needs, not fulfill - also P.O. "clear line" to LTS is not a clear commitment to do anything)
 continue on a separate sheet if you need to

Crossing and Agriculture

Q29 Do you agree with our Preferred Option? If not, tell us why

Yes No

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments Need to protect wider range of agric land. Also, PO Pt 2 is circular - it would permit development in interests of "settlement strategy" - ie no protection at all of even "prime" land
 continue on a separate sheet if you need to

Subdivision of Existing Crofts

Q30 Do you agree with our Preferred Option? If not, tell us why

Yes No

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments
 continue on a separate sheet if you need to

Forestry and Woodland

Yes No

Q35 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments No definition of "integrated well"
w/ other land uses. Need specific
Criteria protecting woodland areas from other use development
and regulating commercial woodland practice
continue on a separate sheet if you need to

Minerals

Yes No

Q36 Do you agree with our Preferred Option? If not, tell us why

Do you prefer the stated alternative?

Are there any other alternatives that should be considered?

Comments
continue on a separate sheet if you need to

A HEALTHIER HIGHLANDS

Open Space and Physical Activity

Yes No

Q37 Do you agree with our Preferred Option? If not, tell us why

Are there any other alternatives that should be considered?

Comments
continue on a separate sheet if you need to

Access to the Outdoors

Yes No

Q38 Do you agree with our Preferred Option? If not, tell us why

Are there any other alternatives that should be considered?

Comments Need standards/criteria
requiring that increase in access be
accompanied by measures, including
funding, for protection + maintenance of
continue on a separate sheet if you need to

natural
areas to which
access granted

End of Questionnaire

Dawn Sutherland

From:
Sent: 09 November 2009 17:48
To: devplans
Subject: Questionnaire Highland Wide Local Development Main Plan Rpt



Addendum to
Questionnaire 9 no.

I have tried to fax my response to your Questionnaire. In case the fax did not arrive intact, I shall send the hand-written copy through the post. However, as my most important response is with regard to the A96 corridor and the Tornagrain new Town proposals, which I strongly oppose, I did write up a more comprehensive addendum. I have attached a copy of my addendum to this e-mail.

Many thanks,
Diana Buchanan
Dalcross Castle
By Croy Inverness

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

Additional comments

D. Buchanan

As was made clear at the informational meeting held at Croy Hall this past October, the Local Development Plan's proposals for the A96 Corridor and specifically, Tornagrain, is premised upon:

1. An "aspirational" high degree of intense, quasi-urban development of a hitherto agricultural area that is currently notable for non-urban natural and environmental amenity
2. High dependence on developers for funding for key infrastructure with consequent granting permission to developers before key infrastructure has been publically funded or paid for by the developers
3. Creating one brand-new extension of urban sprawl originating in Inverness, rather than organic growth of existing Highland communities.

1. Level of development

Neither the Plan upon which this Questionnaire is based, nor the representative to the meeting or any other documentation submitted thus far to the communities involved have adduced any convincing data that would indicate:

- a. the existence of economic conditions that would produce employment for a radically increased population
- b. any other reason to suppose that the actual local population would grow at a rate that would require 5,000 houses at Tornagrain or 30,000 houses along the corridor

Indeed, the representative explained that the numbers were based on growth "aspiration" rather than any concrete prospects of employment or other real need of that scale. It appears arbitrary and contrary to common sense to aspire to a population density that is a. unlikely and b. undesirable from the point of view of the quality of life of local communities or individuals and harmful to existing local interests in agriculture and tourism. It will be detrimental to the area's extensive wildlife, much of which is endangered. By paving over an area of land that is crucial to drainage of the considerable amount of rain and groundwater from higher levels, it will cause disruption to the local ecology. As the tenor of local input has made abundantly clear, the area's natural beauty is the draw for existing residents and incomers, as well as our tourism trade. The agricultural use of the area is crucial to a national need for domestic food production and the Scottish national policy of encouraging the procurement and consumption of local produce for environmental, health and economic reasons.

Moreover, because it would be virtually impossible to provide truly local employment of the scale required to warrant this level of housing density without turning the entire area into an industrial park, the town will simply contribute to the pressure and pollution on the roads to Inverness. Far from being environmentally or economically sustainable, the new town will create far more car travel.

Given the unattractiveness of a community built upon a plain that floods regularly and will flood more with increased paving, under a flight path and in an area with low-density employment during an economic recession, it is more than likely that it will

D. Buchanan

quickly become an under-occupied slum. The loss of natural and community resources will, of course, be irrevocable.

2. It is readily apparent that one of the driving motivations of the Plan's concentration of development on one stretch of agricultural and forestry land is that such a plan appeals to developers more than the more acceptable strategy of growing existing communities at a reasonable level. The importance of pleasing the developers is presumably because the Council wishes to shift the cost of improving infrastructure. Hence, the Council offers no alternative proposal. It should be pointed out that even with *no* population increase, the area suffers from inadequate road provision and maintenance, insufficient public transport, limited healthcare, poor schooling and constrained care for the elderly. *These are obligations which the Council is supposed to meet even if there is no new development and are not optional.* Whilst it is understandably tempting to believe that limited public funding can be substantially replaced by private developers, it must be understood that:

- a. Developers are not around for the long-term. Their profit comes from selling their developments and therefore they have a huge incentive not to deliver fully, to deliver at a low level and to wear out the Council by delaying until ownership passes to their buyers, who will not be bound to make any public contribution. They have a great deal of expertise at shirking their responsibilities.
- b. Enforcement after-the-fact of even a detailed agreement is costly, time-consuming and never substantially satisfactory. The developer knows that the Council's pocket is shallow and political will intermittent. Therefore the *only* time the council has any leverage is before permission is granted. The developer must be forced to put in the infrastructure first, before being allowed to break ground on any profit-making part of the project.
- c. The scale and inappropriate nature of the new development will place disproportionate stress on existing infrastructure, the full cost of which will not be met by the developer, especially as the developer will be gone before most of the social, natural and economic costs hit.
- d. Because of the unduly large scale of the development, it is unlikely to present much of a profit margin to the developers and so they will be even more eager to cut corners to cut costs.

3. Urban Sprawl

It is in the nature of cities to grow cheaply at their edges, rather than to regenerate their centres. The proposed will contribute to the creation of one long strip of urban development from Inverness to Nairn. Anyone familiar with the creep of fast food outlets, cheap housing and low-grade "industrial" units along the nation's motorways can see what will come of this. Air, noise and light pollution extends into the countryside, which quickly loses its amenity character. Small

D. Buchanan

local communities get swallowed up and housing loses its value. Concomitant social issues rise with the loss of traditional communities and places where people

actually are proud to live. In the Highlands, tourism and marketing of its natural amenities as well as agriculture are critical to the economic health of the area as well as the less material enjoyment of its residents. It is surely throwing the baby out with the bathwater to destroy existing economic, natural and social assets in the interest of attracting totally hypothetical and unlikely levels of unspecified other employment. It would be far better to devote what resources the council has to infrastructure improvements and growing the existing towns and villages of the area in a sensitive and sensible way.