

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

Reference Number:	<b>HWLDP-MIR-67</b>
Organisation/Individual:	Dr Joan Noble

### 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	
Vision for the Highlands	x
Inverness and A96	x
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	x
Tornagrain	
Smaller Settlements in A96	
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	
Affordable Housing	x
Planning for an Ageing Population	x
Gypsies/Travellers	
Retailing	
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	x
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:

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

<p>Population projections  Infrastructure provision needs to be addressed more fully  Tourism needs more focus in proposed plan  A number of attachments appended to the response regarding consultation on the "A96 growth corridor framework" 2007</p>
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Action Sheet Completed by:	SH
Date:	8/12/09

H.C. PLANNING AND DEVELOPMENT SERVICE		
09 NOV 2009		
PASS TO	INITIALS	DATE
FILE REF:		

**Dr Joan L Noble MBChB, FRCP, BA (Hons)**  
**Delnieswood, Moss-side Drive, Nairn. IV12 5PN**

Director of Planning and Development  
 Highland Council  
 Glenurquhart Road  
 Inverness

04/11/2009

Dear Dr Black

**Re: Main Issues Report August 2009**

Subsequent to reading the Main Issues Report and attending meetings about it, I would like to comment as follows:

**Vision**

This is very admirable,

- quality of built and natural environment
- reducing CO2
- creating new employment across the area
- improving transport infrastructure
- Key resources consistently protected (coast, forestry, agriculture, crofting)
- Investment and opportunity in deprived areas.

However, everything that follows in the report is diametrically opposed to these objectives.

- Ribbon development along the coast from Inverness to Nairn on good agricultural land.
- Vastly increased commuting leading to huge increase in emissions
- No suggestion as to what new employment might be achieved
- Admission that transport infrastructure will not improve short to medium term
- Key resources likely to be seriously damaged by inappropriate development
- Complete absence of a strategy for any area outwith the 'A96 corridor'

'The continued growth and development of Inverness and surrounding area is essential so that the Highlands can continue to prosper' p7

Whose opinion is this? Certainly not those areas beyond the Moray Firth who have been neglected in the rush to pour everything into Inverness. Certainly not the people of Nairn, whose livelihoods depend mainly on tourism, farming, forestry, whisky, health and local service industries. They will see their community and traditional sources of employment severely damaged by huge sprawling inappropriate and unnecessary housing developments.

## **Population**

The entire main issues paper is founded on a complete fallacy – that the population of the Highlands should, and can be made to more than double in size to 500,000 people, and that this would be a good thing .

It has taken since the mid 1970s for the population of both Nairn and the Highland region to increase by 15%. This was at a time of a genuine increase of high quality jobs in the oil industry, a buoyant national economy, and increasing personal wealth. In fact the figures used in the main issues paper assume that, in the high scenario 30 year increase of population in Highland, all 30,000 people would move into the 10 mile stretch between east Inverness and west Nairn.

These figures are just rubbish, and planners have a duty of care to their employers (who are the tax paying public), to look at future projections with due objectivity, not in this ridiculous ‘aspirational’ manner.

The high population projection figures of page 32 cannot stand up to any intelligent analysis.

- They depend entirely on immigration into the area, which is now falling dramatically, and a lot of EU workers are returning home as their own economies are performing much better than ours. No longer can very many wealthy retirees confidently sell up in their home areas and move. Second homes are also less likely to be bought.
- It also seems probable that UK immigration policy will in future be much tighter than of late, regardless of which party is in government.
- It is very unlikely that, at a time of recession, jobs will be relocated or created in the Highlands, especially as transport links are so poor and expensive, and so many firms are experiencing contraction and financial troubles. We will be struggling to hold onto the jobs that we have especially in the public sector.

## **Housing**

We have a major recession with the housing market (both new and existing) in crisis and employment contracting rapidly. Highland depends on the public sector for 31% of its employment, and there will be major cuts in public sector jobs as budgets are reduced. Highland Council’s own budget is to suffer a 15% cut. It is likely that this recession ‘s effects will last for up to a decade.

Nairn in particular has around 200 houses on the market at present, and very little interest. As they have found in Ireland, flooding the market with unnecessary housing which no-one can buy ruins both local and National economies.

## **Affordable Housing**

Why not take the opportunity to buy some of the houses on the open market for housing association or council use? It would be cheaper and could be done very quickly. It would also help existing house owners who cannot shift their property. More than half of the housing list in Nairn is single under 25s, who to my knowledge have never been a priority for social housing, so it seems as if the figures of people waiting for houses are very inflated.

## **Ageing population**

Highland, and especially Nairn has a huge and increasing percentage of elderly. Because of the lack of employment locally, many people now moving to the area are not job dependent, and most will be elderly. The recurrent costs of looking after the existing elderly plus those who move in are enormous, and this is against a background of impending major social work and health cuts.

## **Developer Contributions**

It seems that inappropriate developments are more likely to get planning permission if the developer pays money to the Council. Usually this amount is a drop in the ocean compared to the infrastructure and recurring costs that the developments incur. The main issues report seems to imply that if the developer won't or seems to be unable to pay the contribution then it could be waived!

## **Environment**

The A96 corridor plans contravene much of National Planning Policy:

- Landscape. There is a major presumption against development in areas of outstanding landscape, which the inner Moray Firth certainly is
- There is a major presumption against the use of high quality farmland for development, especially with a future probability of global food shortages.
- There is now an embargo on developing isolated coast, and a presumption against developing undeveloped coast, which makes the proposals for Delnies unacceptable
- The satellite settlements at Tornagrain, Whiteness and West Nairn will lead to a huge increase in commuting, which contravenes national policies on emissions. There is not the remotest chance that thousands of local jobs will suddenly be 'magiced up' for these settlements

## **Infrastructure.**

The report is particularly evasive on this subject.

It is quite clear that:

- There is inadequate water and sewage capacity for the proposed developments
- The road system is at capacity at present, and impinges hugely on the quality of life of local residents, the ability to travel, and the number of deaths and injuries on the roads.
- In Nairn, the schools are at capacity
- Also in Nairn there is particularly poor social work provision for the existing elderly, far less greatly increase their number.

It would appear that the planners are recommending that developers are allowed to make a start on projects, and that the infrastructure will in some way catch up. I am shocked that professionals who are paid to make sure that this does not happen, are actually recommending this very inadvisable and unprofessional course of action.

## **Tourism**

'Tourism is one of the key sectors in Highland'

I see nothing in the report which will benefit tourism, and in Nairn in particular, the huge inappropriate developments proposed would kill tourism in the town stone dead.

## **Issues Particular to Nairn**

‘Expansion of Nairn is an important element of A96 corridor framework’

I am very puzzled as to why this should be. It would appear from all the meetings which have attended, that the vast majority of Nairn residents are very opposed to being swamped by huge new housing developments which will seriously damage existing industries. So who is driving this juggernaut? It wouldn't by any chance be the developers?

## **Key Issues**

‘Development is necessary to contribute to the by pass.’ Nairn needs a by pass now, and should in no way be subject to more traffic before the by pass is started. For all the oil revenues which Nairn has helped to produce, it is shameful that so little has been done to offset the infrastructure problems that development has created.

‘Ensure proposals enhance the distinctive and historical development of the town’  
By doubling the population and sprawling seven miles along the coast?

## **Nairn Framework Plan**

Page 19 contains a plan which is a slightly modified version of one of five drawn up by Halcrow as part of the A96 framework ‘consultations’.

Their criterion for good development (Highland Smart Growth Development Principle) was based on 11 good planning points in 4 categories: Environment; Economic Development; Accessibility; Community Inclusion.

Both of the options (A and D) which included development at Delnies and Hilton failed miserably on nearly every criterion. (appendix 1)

There was a public exhibition, and a questionnaire for voting and expressing opinions on the options. People attending were overwhelmingly in favour of Option B (Nairn going South, a smaller number of houses, and a long by pass.) This was also the opinion of the then provost Sandy Park. Questionnaire results were never released.

Halcrow's own options appraisal after the consultations also favoured plan B.(App. 2)

There were then workshops held with ‘stakeholders on September 20<sup>th</sup> 2006 under the banner of ‘Collaboration for Success’.

The consultant involved, Duncan Whatmore ranked the proposals and again options A and D were ranked bottom. (App.3)

A selection of the comments from Halcrow and Whatmore appraisals, particularly on the Hilton and Delnies housing are:

‘Potentially divisive’: ‘East west spread too wide’; ‘Poor walking access’; ‘not of benefit to existing town’; ‘two separate places’; ‘housing remote from Nairn’; low density areas will be peripheral and encourage private car use’.

It was therefore a very unwelcome surprise that a modified option A, which failed on almost every criterion, appeared in the eventual A96 framework, and is still in the plans on page 19. How did this come about? One can't help wondering.

In addition to failure on the SMART criteria, the A96 framework plan fails on landscape policy, coastal policy, ribbon development, emissions, commuting, employment, infrastructure, golf course run off into SSI 1, and is on prime agricultural land.

That seems to cover every category which it could fail on, and yet here it is again.

Why should I, as a member of the general public, be having make all these points to the planning department? You are the ones who are paid and supposedly trained to do this job.

Developer and landowner greed and marketability seem to be the only show in town as far as the main issues report is concerned. As a planning document it is an abject failure and requires to be binned and completely rethought, this time actually listening to the people who live and work in this beautiful area. We need to promote and develop the strengths of the entire Highlands, not destroy existing industries and quality of life.

Yours faithfully,

A black rectangular redaction box covering the signature of Joan Noble.

Joan Noble