

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

Reference Number:	HWLDP-MIR-57
Organisation/Individual:	Halliday Fraser Munro Planning – Tulloch Homes North

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	
NPF2 for Scotland	
Vision for the Highlands	
Inverness and A96	x
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
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	
Gypsies/Travellers	
Retailing	
Developer Contributions	x
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:

General comments re: housing need and supply/promotion of land release at Ness-side to meet housing supply: Inner Moray Firth LDP

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

H.C. PLANNING AND DEVELOPMENT SERVICE

02 NOV 2009

PASS TO	INITIALS	DATE
SB		
MM		

FILE REF:

HIGHLAND WIDE LOCAL
DEVELOPMENT PLAN –
MAIN ISSUES REPORT

NESS-SIDE, INVERNESS

OCTOBER 2009

On behalf of Tulloch Homes Ltd
North



HALLIDAY | FRASER | MUNRO
PLANNING

HALLIDAY FRASER MUNRO

STANHOPE HOUSE
STANHOPE PLACE
EDINBURGH
EH12 5HH

Our Ref: P1495/HS

29 October 2009

Director of Planning and Development
The Highland Council
Freepost 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 Tulloch Homes Ltd North. Should you wish to discuss any aspect of this representation please do not hesitate to contact me.

OFFICES IN ABERDEEN
BELFAST, DUNDEE
AND GLASGOW

Yours faithfully



Hazel Sears
For HALLIDAY FRASER MUNRO PLANNING

Cc Neil Cameron- Tulloch Homes North Ltd
Richard Hughes- Tulloch Homes North Ltd

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HIGHLAND WIDE LOCAL DEVELOPMENT PLAN- MAIN ISSUES REPORT

RESPONSE ON BEHALF OF TULLOCH HOMES LTD NORTH

INITIAL COMMENTS

The format of the document is not easy to read. 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 place on sites, which are already allocated or are within potential regeneration areas. The MIR anticipates that these sites are 'available for development and are capable of providing for the housing need in the next three to five years.'

The Council is preparing a City Vision for Inverness with Architecture and Design Scotland and it is unfortunate that this document is not yet available to be read with the MIR. Its provisions therefore cannot be taken into consideration in a reasoned response and equally its relevance at a late stage in the Local Plan process must therefore be questionable.

The MIR identifies that land at Ness-side, which has been zoned for housing for a number of years, is held up by lack of a new car and pedestrian river and canal crossing. Although the Council's Proposed Option is to highlight and prioritise key development sites there is no indication in the Report as to where funding is to come from to provide such essential major infrastructure works or indeed whether these works are essential to develop the site.

The Inverness Trunk Link Road has not been identified as part of the Scottish Motorway and Trunk Road Programme March 2009. There is therefore no likelihood that this link will be in place for the foreseeable future, although the Council's Local Transport Strategy for the Highlands 2009-2012 Draft suggests that the link road from A9 to A82 is a Trunk Road Priority. Within the current economic climate it is not a realistic option for developers to subsidise major infrastructure works which the Council has identified as essential and therefore this site is effectively sterilised.

Preferred Option

The Council's Preferred option of supporting those sites, which have already been identified for development purposes is strongly supported. However new ways have to be investigated to ensure delivery where there are perceived infrastructure constraints. Solutions must not rely on developer contributions, which in the current economic climate will constrain sites even more and cause further delays in deliverability.

The development of Ness-side must be targeted as an early, priority release in advance of any new crossings to allow the Council to meet its housing land requirements.

It is noted that the Council is engaging with Transport Scotland British Waterways and Historic Scotland to progress matters starting with the development of a Joint Action Plan. This action is strongly supported. It is respectively suggested that it would be relevant to engage landowners at an early stage in such a process.

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 Inverness, there is a 'clearly identifiable deficit in the existing land supply' both currently and "in the following 10 year period."

However, and as identified in response to Question 1 above, several of the currently allocated sites are constrained for development either in the immediate or short term. In the case of Ness-side, despite having a local plan allocation since 1994 and the preparation of a Design Brief by the Council, this is due to perceived lack of road infrastructure, specifically a link to the A82 to the west.

As detailed above and as conceded by the Council the allocation of a site does not guarantee its delivery. Pragmatic solutions have to be found.

QUESTION 14- AFFORDABLE HOUSING

The MIR 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 approximately 25%. In Inverness this tenure is even lower only amounting to 14-16% of the housing stock and the Assessment concludes that numerically over 15 years most new social rented housing is required in Inverness (around 4600) units.

In support of the responses to Questions 1 and 2 land release at Ness-side will increase affordable housing stock. Unless such sites are developed urgently to meet mainstream needs affordable housing provision will continue to be unmet and the backlog in demand will grow. However Council requirements for such provision have to be assessed against other essential developer costs. Within the current economic climate there are constraints regarding available finance to cross subsidise.

Preferred Option is to currently take a realistic, flexible approach to affordable housing contributions to enable developments to proceed.

QUESTION 18 – DEVELOPER CONTRIBUTIONS

As indicated above, 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. Continuing 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 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, as detailed regarding affordable housing contributions, is for the Council to take a realistic, flexible approach to developer contributions to enable developments to proceed.

Halliday Fraser Munro
October 2009



DRAFT

Location Plan
 Scale
 Date
 Dwg. No.
 1/1250@A3
 Oct 09
 Phase (S) 01

Tulloch Homes North Ltd-
 Ness-side: Representation to Highland MIR

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