

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

Reference Number:	HWLPD-MIR-190
Organisation/Individual:	Highlands and Islands Enterprise (West Highlands and Islands)

### Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (Please Specify) - pass comments on Coastal Development Strategy to Coastal Planning Team	X

*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	X
Vision for the Highlands	X
Inverness and A96	
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	X
Nairn	
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	X
Easter Ross and Nigg	X
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	X
Natural, Built and Cultural Heritage	

Previously used Land	X
Wild Land	
Water Environment	
Renewable Energy	X
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	
Accessibility and Transport	X
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	X
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:

- Should make more expressed provision for the development of an appropriate vision to support the needs and opportunities of the west coast
- Detailed comments on Coastal Development Strategy - Passed to Coastal Planning Team
- Detailed comments on transport and a number of policy options

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

**Dawn Sutherland**

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**From:** Scott Dingwall [REDACTED]  
**Sent:** 09 November 2009 15:56  
**To:** devplans  
**Subject:** Highland Wide Local Development Plan / Highland Coastal Development Strategy

Dear Sirs

I note that the Closing Date for responses is 5pm today. Please find attached a letter issued previously to Mr MacLeod in relation to the above.

<<2009 10 29 \_ letter to Malcolm MacLeod \_ Highland Wide Local Development Plan.PDF>>

Yours faithfully

Scott Dingwall  
HIE

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Tha an teachdaireachd seo dìomhair agus 's ann dhan neach-ainmichte a-mhàin a tha i. Ma 's e is gun d'fhuair sibh le mearachd i, feuchaibh is leigibh fios sa spot dhan neach bhon tàinig i. Tha cleachdadh neo-cheadaichte na teachdaireachd seo fìor-thoirmisgte. Tha HIE a' cleachdadh bathar-bog a-chum gus luchd-obrach na buidhne a dhion is cuiridh i às do phost-dealain sam bith sa bheil càil oibheumach no truailleach.

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Malcolm MacLeod  
Development Plans Manager  
The Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

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

29 October 2009

Dear Malcolm

**HIGHLAND WIDE LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT  
DRAFT HIGHLAND COASTAL DEVELOPMENT STRATEGY**

Thank you for the opportunity to comment on the above documents, Highlands & Islands Enterprise supports the concept of developing the longer term vision for planning in Highland. Comments are set out below, and in relation to a number of points we are keen to have further discussion and consultation with the Council.

**Highland Wide Local Development Plan**

In general terms, the plan offers a comprehensive picture of the current state of development across Highland, but we would suggest that to fully address our aspiration for growth the twenty year vision could offer significantly more in terms of the potential for change.

It is noted that the plan does not identify the requirement and opportunity for a spatial vision for the West Coast, incorporating the fragile areas. The Plan should make express provision for the development of an appropriate vision to support the needs and opportunities of the West Coast. HIE would be keen to discuss this further through our relevant area teams, which would assist our own focus on supporting the fragile areas.

Some specific comments are noted below:

Page 3 – The plan should reflect the fact that much of the west coast and islands are served by the A82 north onto A830 / A87 rather than via Inverness.

Page 3 – There is an opportunity to be more specific regarding development opportunities in response to renewable energy, such as the facilities at Scrabster and Kishorn.

Page 4 – The Sustainable Highland Communities section suggests that delivery will be through use of developer contributions and linking to Council and Partner Agency development programmes. We would question whether this can be realized and whether needs can be addressed consistently across the region.

Page 5 – Better Opportunities for All. We agree with this principle, and this reinforces the need for the West Coast Spatial Strategy referred to above.

Page 6 – It is noted that the key development areas listed exclude the West Coast and again we would propose that a West Coast Spatial Strategy be developed to address this.

Page 17 – The framework plan for East Inverness lacks any mention of Use Class 5 (general industrial) provision which is already in short supply, and the use Class 4 is also limited. We would welcome further discussion on these elements.

Page 23 - The link for the document, 'Defining the Dounreay Site End State' has been sent separately.

Page 23 – 25 To promote the Caithness and North Sutherland Regeneration Plan, it is essential to propose allocations of land for Use Classes 4, 5 & 6. Some options are addressed in a review prepared for HIE by Bidwells in 2008 (copy previously circulated to HC), and DSRL has undertaken work related to the Dounreay site. Other key areas are Wick, Thurso, Scrabster harbour, Mey, Golspie and some smaller west coast locations.

Page 26 – We are keen to promote Nigg as a strategic site for Scotland as well as the Highlands, being one of few sites in the EU with key attributes of importance to large commercial scale development of off-shore wind farms. (Should note for accuracy that the site has been *substantially* vacant for the past 5 years) Specific sites such as Highland Deephaven, Delny and Seabank should be addressed at the third bullet point. We support the economic development of other strategic sites (Invergordon and Evanton) as developments at Nigg could put additional pressure on other sites in the Cromarty Firth, critical to the growth of some of our key engineering and fabrication companies, therefore the recognition in the plan of development potential at Invergordon and Evanton is welcome.

Page 28 to 30 – These sections reinforce the need for a West Coast Spatial Strategy

Page 43 – Developer Contributions. In terms of the first bullet point of the Preferred Option section, reference to 'community' should be clarified as referring to the 'local community'. We would recommend that a third bullet point is considered whereby employment land uses do not attract developer contributions or do so at a reduced rate. A bullet point should be added to reflect the earlier statement that sustainable economic growth should not be undermined and contributions could be adjusted downwards if a developer can demonstrate that a proposal will not go ahead because of the level of contributions sought. Further discussion and consultation is required in relation to this policy area.

Page 46 – Previously used land. The statements made require to be reviewed and clarified. Availability of vacant and brownfield sites vary considerably throughout the region. Recognition should be given to the extraordinary site development costs associated with contaminated land, particularly in the Highland area. Developers should only be required to remediate to ‘reasonable’ levels for the development they are proposing.

Page 47 – The proposed wild land restrictions require further consideration and clarification so as not to impact unreasonably upon existing fragile and/or coastal communities.

Page 49 - 51 Renewable Energy - The impression in the plan is very much one of protection rather than development, zoning large areas for exclusion from wind farm developments in excess of 20MW. This includes an area in the Inner Moray Firth – and such a zone may breach those being considered under STW or Round 3. There is support in the plan for a sub-sea electricity network (as per NPF-2) but no mention of on-shore upgrades which are essential and indeed a precursor to any sub-sea cables. Equally, there will need to be account taken of on-shore landing points for grid connections related to developments in the Pentland Firth. In respect of the preferred options, there is a proposal to establish targets for development of different technologies - suggest that market forces (albeit influenced by banded ROCs) should prevail; and also plans to set out criteria for consideration of proposals for renewable developments. Clear guidance or criteria would be useful from developers’ perspective but if too prescriptive and protectionist could result in the region being perceived “no-go” area for commercial scale project developers. Risk therefore of restricting Highlands and Islands’ opportunity to make significant contributions to Scottish, UK and EU renewable targets.

Page 58-59 – The document as a whole, and this section in particular, should provide for the identification of sites for industrial and commercial uses which may be incompatible with mixed use or housing allocations. We support appropriate mixed use developments however this should augment business land allocations rather than replace them. The bullet points should be augmented to specify the allocation of sufficient specific business and industrial land.

Page 60 – It is noted that key transport upgrades relate to routes that are the responsibility of Transport Scotland or Network Rail.

Page 68 – Preferred Option should make reference to promoting investment in marine access and tourism infrastructure

Transport – I have appended some specific comments relating to transport impact throughout the plan.

## **Draft Highland Coastal Development Strategy**

We would wish further clarification as to the implications of the coastal designations of developed, undeveloped and isolated, and consultation on this process. We would be concerned if the designations restricted sustainable economic development. The designations should have regard to future opportunities rather than reflecting current land uses, and caution against a potential anti-development designation. When implications of designations are clarified, it is recommended that there is further review and consultation on the locations and appropriateness thereof.

Some specific comments are noted below:

Page 3 Might be appropriate to reference to the major changes imminent from (a) the Water Framework Directive and (b) The Marine Bill - expected to be enacted by Summer 2010.

Page 3, 1.2 1st bullet - in addition to decline in some communities probably more issues are arising from the growth of others with demands on infrastructure such as water and sewerage with significant implications for coastal water quality.

Pages 8 & 12 - Conflicting definitions of the coastal zone - does it run inland from "Mean Low Water Mark of Spring Tides" or from "high water mark"? It is suggested it could be readily established as the seaward limit of local authorities' planning powers (other than for marine aquaculture).

Pages 15, 16 Aquaculture - the section ignores shellfish farming, also 5.5.2 and 5.5.3 contradict in claiming that the salmon sector's desire is respectively "more and bigger sites" and "fewer and larger sites".

Page 16 5.6. Fishing - refers in its second line to "freshwater" fish which requires clarification. In 5.6.2 it would be useful to confirm if the four Inshore Fisheries Groups are yet in existence in the Highland Council area.

Page 24 In 5.13.2 there is mention of increased intensity and frequency of storms, however need to clarify the evidence to support the comment about rising sea levels.

Page 26 Sub-regional overviews

It would be helpful to have illustration of the three sub-regions (perhaps using the maps already in Appendix 3), and also to define the limits of each sub-region e.g. Duncansby Head to Cape Wrath

6.1 Vision. Since this Strategy is for the coastal zone, can the 1 km strip of land along the east sub region "... accommodate significant population growth and major industrial development in this area, which at the same time can offer and sustain a pleasant environmental setting."? This requires clarification as most of the economic and housing development is likely to take place in areas contingent upon the coastal zone.

Table 6.1 Harbours – There is a challenge in sustaining harbours such as Wick and Helmsdale and smaller slips and quays in the face a shrinking fishing fleet

and the potential of major repair/maintenance costs. As energy costs rise there may be opportunities in the medium term in coastal freight traffic, possibly even passenger traffic in and out of Inverness.

Page 37

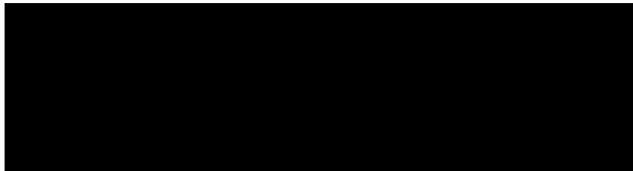
6.1.3 2nd bullet point. Given the population centres in this sub-region the needs of the increasing resident population for recreation facilities should be recognised alongside the desires of tourist visitors to the area.

Page 49 The background on aquaculture should include shellfish.

Page 51 landscape - Opportunities - Include in tree planting schemes the beneficial impacts of broadleaf planting on freshwater systems and thereby improved salmonid stocks.

It would be helpful to confirm the timescales of the next stages of the process, and whether these allow for further consultation. As noted above, there are a number of areas where we would wish to have further detailed discussions. Also, if it would be helpful to have a meeting to amplify any of the comments made in this letter, please let me know. I am on holiday 30 October to 23 November, but Keith Bryers (and appropriate colleagues) would be willing to meet in my absence.

Yours Sincerely



**CHARLOTTE WRIGHT**  
**REGIONAL DIRECTOR - HIGHLAND**

## **Highland Wide Local Development Plan – Transport issues**

### **Response from Highlands & Islands Enterprise – Appendix**

**1. Overall vision** – no major comments.

**2. Inverness.** We agree with 'early consolidation' option. An updated city vision, taking into Inverness' role as a significant tourist destination, future university town, and opportunity to develop low carbon economy would be welcomed.

We would highlight importance of planning around designated public transport and walking/cycling routes in all new developments rather than trying to add these afterwards. For a 21<sup>st</sup> Century city, it will be increasingly important to provide easy access to a range of transport options to attract new residents and businesses and contribute to reducing carbon emissions.

**3. A96 corridor.** Agree with overall approach. Whilst upgrading A96 is essential to support long term development, investment in public transport (rail & bus) also really important. Transport Scotland propose improvements to Inverness-Nairn rail service in STPR that will complement road upgrades (possibly as early as 2015). We would question why the 'A96 green framework' on p12 does not include rail line and stations at Nairn & Dalcross.

**4. East Inverness.** Specific consideration is required re long-term development of bus, walking and cycling routes that will be required to connect proposed developments with the city centre, Raigmore/Inshes, Inverness Retail Park, Inverness Campus and Culloden/Westhill. This might include segregated bus / rapid transit routes, for example, rather than relying on existing A96 or link road for this.

**5. Nairn.** There should be consideration of public transport links + walking/cycling routes to town centre, rail station and any new retail provision in Nairn.

**6. Tornagrain.** We would question why there is no mention of the IABP here, or of planned rail station at Dalcross.

**7. Retailing.** Transport is not mentioned specifically in this section. We would support Council's preferred option, but add that policy should include explicit consideration of range of existing transport options in determining where future development should be directed. In 'congested' areas around Inverness, new retail developments should aim to minimise additional car traffic / actively support development of access by public transport, walking & cycling.

#### **8. Accessibility and Transport.**

The 'preferred option' places 'emphasis on reduction of emissions and promoting use of cleaner fuels' but this could apply simply to private (car ) transport. A stronger emphasis could be placed on supporting Government's carbon emissions targets by a) encouraging new developments that support sustainable transport modes and minimise additional car traffic in 'congested' areas, b) through the LTS, enabling the development of public / active travel networks, c) supporting provision of petrol/diesel through existing rural filling stations, plus future low carbon vehicle technology in rural areas as this is developed (e.g. electric or hydrogen vehicles). Regard should be given to the Government's consultation on low carbon vehicles which has just concluded, which is considering when, where and how new infrastructure, such as electric vehicle charging points will be required.