

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

Reference Number:	<b>HWLDP-MIR-132</b>
Organisation/Individual:	GH Johnston Building Consultants – Mr I Alexander, Home Farms Ltd, Meads Farm and Brahan Farms Ltd

**Action:**

Immediate Response Required	<input type="checkbox"/>
Meeting required with Respondent	<input type="checkbox"/>
Issue for Area Local Development Plan	<input type="checkbox"/>
Further Information Required	<input type="checkbox"/>
Other (Please Specify)	<input type="checkbox"/>

*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	
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	
Housing in the Countryside	x
Affordable Housing	
Planning for an Ageing Population	
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	
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:**

Need to differentiate the potential of buildings which are redundant/unused but are not traditional/an eyesore in Housing in Countryside Policy  
Housing in Countryside Policy is too restrictive

Action Sheet Completed by:	SH
Date:	9/12/09

HNLDP-MIK-152

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Project Ref: CM/IF/1896/1958/1912//1864

5 November 2009

Mr Stuart Black  
Director of Planning and Development  
The Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

H.C. PLANNING AND DEVELOPMENT SERVICE		
09 NOV 2009		
PASS TO	INITIALS	DATE
RHP		
MM		

Dear Mr Black

### HIGHLAND-WIDE LOCAL DEVELOPMENT PLAN HOUSING IN THE COUNTRYSIDE

We refer to your consultation letter dated 28<sup>th</sup> August 2009 and welcome the opportunity to participate. Further to the Council's Main Issues Report we wish to lodge the following representations on behalf of our clients Mr I Alexander, Home Farms Ltd., Meads Farms and Brahan Farms Ltd.

We represent several parties with an interest in the potential for housing development in rural locations. We lodged representations on 21<sup>st</sup> May 2009 in respect of the Housing in the Countryside policy review. The policy recommendation as considered by Committee on 12<sup>th</sup> August 2009 is not coherent in places. We are unsure therefore whether the changes to policy that we sought, are included or not. It is possible that a simple typographical error has caused the policy to present terms the Council did not intend. However, there is no record in Appendix 2 which accompanied the recommendation on 12<sup>th</sup> August 2009 and which summarises "the main issues raised (by representations) and the Council's response", of our points having been considered. We are therefore obliged to reiterate our representation in the following terms.

The gist of our representation was that the policy prior to 12<sup>th</sup> August 2009 referred to PAN 73 as defining brownfield sites as "sites which are occupied by redundant or unused buildings or land that has been significantly degraded by a former activity" and that the Council's approach in respect of "the conversion or reuse of traditional buildings or the redevelopment of derelict land" did not acknowledge or differentiate the potential of buildings which are redundant or unused but are neither "traditional" nor an "eyesore". Our case was that such buildings do represent a conspicuous resource in the countryside which could broaden the range of housing opportunities. If such opportunities are promoted in line with the policy they also give potential to avoid creating "eyesore's" of the future, degradation of the countryside and loss of amenity.

However, in seeking to create a more flexible policy (Minute of the PED Committee 12<sup>th</sup> August 2009) the Council has arrived at an interim position which indicates that "There will be a presumption in favour of conversion and re-use or redevelopment of buildings and land where former uses have ceased ..., the site is significantly degraded and where the development would bring about an environmental benefit". This is no less restrictive and continues to require that

redevelopment of redundant or unused buildings (as recognized in national policy and by the Council's reference to PAN 73 in its Housing in the Countryside policy) still requires to satisfy that *the site is significantly degraded*. National policy PAN 73 refers to "land that has been significantly degraded by a former activity"; it does not refer the term "significantly degraded" to "sites which are occupied by redundant or unused buildings".

**As regards Q13, an important missed opportunity to promote development in line with national policy, address the Members stated concerns that the policy is too restrictive, and avoid spoiling the countryside could be rectified by adding the word "or" before "the site is significantly degraded". It might be further clarified and brought into line with national policy by replacing "the site" by "land".**

We would be grateful of the Council's consideration of the matters we raise and would be available for discussion should that be helpful to you.

Yours sincerely

Colin Mackenzie MRTPI  
G H Johnston Building Consultants Ltd