

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

|                          |                     |
|--------------------------|---------------------|
| Reference Number:        | <b>HWLDP-MIR-77</b> |
| Organisation/Individual: | Jane Arnold         |

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

**Key:**

|                   |                         |                       |                     |
|-------------------|-------------------------|-----------------------|---------------------|
| <b>Background</b> | <b>Spatial Strategy</b> | <b>Policy Options</b> | <b>Consultation</b> |
|-------------------|-------------------------|-----------------------|---------------------|

**Notes:**

|   |
|---|
| <p>General comments that the MIR is skewed to Inverness with not enough on Caithness, Easter Ross, Nigg etc</p> <p>Detailed comments on spatial strategy – Inverness, A96 corridor, Caithness, North Sutherland, Easter Ross and Nigg</p> |
|---|

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

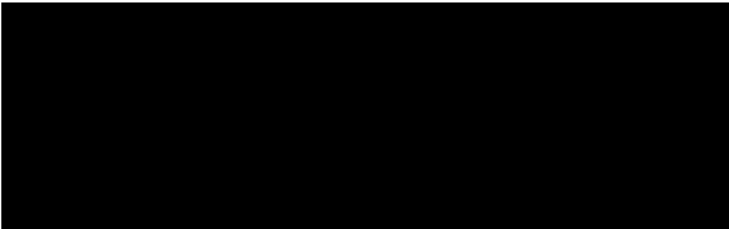
Craigard  
Craigton  
North Kessock  
IV1 3YG

8 November 2009

Dear Sir/Madam,

I hand delivered a copy of the enclosed comments on the Highland Wide Local Development Plan, but forgot to include a name and address. These I hastily wrote onto the outside of the envelope when I was delivering it. As I have had no acknowledgement of receipt of this letter, I decided to re-deliver my comments, just to be sure they have been received.

Yours faithfully



| H.C. PLANNING AND<br>DEVELOPMENT SERVICE |          |      |
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| 10 NOV 2009                              |          |      |
| PASS TO                                  | INITIALS | DATE |
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## **General Comments on the Highland Wide Local Development Plan:**

I find this document very disappointing and do not know whom to tackle. Is it the result of influence from the Scottish government or the HIE or from big business in Inverness or local councillors or is it a hurried production from an under-resourced planning department? Or is it just an idea conceived some time ago and which is now out-dated? I suppose we are all taking time to adjust to the crisis which dwindling oil supplies and climate change will create. Its inevitability has been known since the 1960s, but only now is becoming a reality. Attached is an article "A post-oil world gets less sci-fi by the day" which reiterates the desperate need for us to take oil shortages seriously.

The Plan does mention sustainability, but the actions described within it are not sustainable.

Admittedly the Highland Council Climate Change Working Group's report on the Climate Change (Scotland) Act 2009 was produced after the Development Plan appeared but the Development Plan, as it stands, will not comply with "Section 1(1) of the legislation (which) introduces the statutory target for Scottish Ministers to ensure Scotland's net emissions reduce by at least 80% by 2050 lower than the 1990 baseline."

**It requires just a few minutes of thought to realise that an economic system based on continuous growth is untenable. Land and resources are finite. We are all going to have to accept a lower standard of living and, while we still have resources left, we should use them wisely and for the good of all.**

As a local plan the Development Plan fails. It gives 16 pages to Inverness and the A9 corridor, but just two very hurried pages to both: Caithness and North Sutherland, and Easter Ross and Nigg and a promise of future plans for other areas. A definite skewing to Inverness. All the development is centred on Inverness. Increase the population here and it will decrease in the rest of the Highlands. However, smaller communities, with some support, have more chance of being sustainable. Look at and emulate what is happening in Egg.

There is no mention of how the plans will affect the Highlands culturally, socially or whether it will improve the well being and happiness of those living there. All equally as important as the creation of money.

Anyone in any doubt of the unsuitability of this kind of American development which depends on cars and sprawling shopping centres and housing areas need only read Bill Bryson's The Lost Continent. Or, indeed, visit any modern city in Britain. A most unattractive vision for the Highlands. Why can't we make places which are sustainable and attractive and pleasant to live in? Why do we have to accept ugly building schemes?

**The Highland Council does not have the money to provide services for further big housing developments.** Maybe the sad fact is that we are being presented with these big developments because the planners are strapped for cash and cannot pay for an appeal to the Scottish government if the developers appeal. Certainly, all the areas earmarked are those which land owners have expressed an interest in developing. There are no longer any planning inspectors, and there has been a reduction in the number of planners. Even if this is not why the developments are being proposed, how are the planners going to be able to control the developers properly on their limited resources?

## **My ideas about future housing in the Highlands**

These comments apply to all housing mentioned in the Development Plan.

1 Housing needs to be taken out of the hands of developers - they generally build for profit only. Witness recent housing - there are no community facilities included, materials are not bought locally,

the houses have no, apart from insulation, features to decrease fossil fuel use - they are sometimes not even placed south facing! No provision is made for cycle paths and walk ways within the areas and to the city centre.

2 Building should be purely for local demand. It is mentioned in the Plan that immigrants are creating a demand. I would disagree. Yes, we have had a welcome influx of people from Eastern Europe, but those who are buying houses are from elsewhere in Britain and I would contend that they are moving here because the houses have been built. There is very, very limited building of affordable housing for local people and this is the only kind of housing that is really needed.

3 Insist on very high standards of sustainability. Not just inclusion of insulation but materials being locally sourced, solar panels for water heating, underground heat pumps, biomass stoves, making buildings face the south etc. The technology is there and will become cheaper as more people use it.

4 Discourage, somehow, the building of big houses with high energy demands. Small houses with gardens are what will be needed.

### **My ideas on businesses in Inverness and the Highlands:**

The HIE and the council have an economic policy which involves, rather than developing local businesses, attracting businesses into Highlands from outside the area. However:

1 Local businesses have been proven to give more to the local economy than businesses from outwith the area.

2 Multi-national shops produce a sameness to all the cities in Britain.

3 Big businesses cripple suppliers and have a very poor record in third world countries.

4 They produce particularly ugly buildings because they are motivated purely by profit and with no sensitivity to the area.

5 They are unsustainable. It's the same old thing - continuous growth is not viable. Once all the third world countries have been plundered and small local suppliers put out of business, what then?

We all close our eyes to the effects of our everyday actions. The demand for cheap goods from the public creates great environmental and social damage both here and elsewhere.

6 In the case of food production, when small producers are pushed out we become more and more dependent on a few big producers. This is a very unsatisfactory and dangerous position to be in.

**Small local industries and agriculture are what should be being backed.** The reason given for no longer funding the Highlands & Islands Local Food Network was that the HIE had a policy of supporting just businesses coming into the area from outside. This is something which must be changed if we are to survive the future oil shortages.

### **Now to come to the particular questions:**

#### **Inverness**

##### **Q1**

To start, I do not think that Inverness is suitable for huge expansions because of the need to cross the river. I feel it would be a very sad day, because of the environmental damage, if another bridge is built near Ness-side.

Developing two centres in Inverness will not help the river problem because:

1 Given its layout, Beechwood has no potential as an attractive town centre.

2 To be even vaguely sustainable the centre of a town has to be where the railway and bus stations are. I feel the HIE is very misguided, for this reason, to be pushing for the Inverness College to move to Beechwood. Many students travel by public transport, especially coming from the north.

3 There is good chance that the old town will become disused in such a system.

4 Two centres will not remove the need for people to go from one side of the city, over the river, on

business or pleasure.

Therefore, why not accept smaller? How are you going to feed, keep warm, employ, and transport large numbers of people when fuel has become very expensive, as it definitely will?

Car travel will decrease over the next 30 years and there will be fewer bottle-necks.

The creation of safe cycle paths all round the city and to outlying suburbs is a priority.

More provision for allotments and agriculture is also a priority.

## **The A96 corridor**

### **Q2 to Q7**

#### **Agriculture:**

We will desperately need all spare land for food production and the land from Nairn to Inverness contains some of the best agricultural land available in Scotland. The Highlands has a lot of marginal land which makes this area all the more valuable. The Plan says "we think we should protect prime agricultural land in either class 1, 2 or 3.1 of the Macaulay Institute classification;" Then the next clause obliterates these great words by saying: "and allow development of prime agricultural land only if the development is an essential component of the settlement strategy or necessary to meet an established need." My answer to this is that the strategy needs to be changed. The removal of tenant farmers from this land closely resembles the Highland Clearances. I have attached a very common-sense article by Tim Lang which is one of many on a similar theme ie the great need we will have for agricultural land and for low intensity farming in the future. As most of this land is organically farmed, it is already fitting the bill.

Also, in the Scottish government's Climate Change Delivery Plan (p. 7) one of the 4 transformational outcomes the Scottish Government is working towards is: "A comprehensive approach to ensure that carbon (including the cost of carbon) is fully factored into strategic and local decisions about rural land use through: appropriate protection for Scotland's carbon rich soils; minimising emissions from agricultural and other land use businesses; encouraging the sequestration of carbon, for example, through woodland planting; and the use of natural resources to generate renewable energy." Again, organic farming uses much less carbon than intensive agriculture and, certainly, a lot less than housing and businesses.

#### **Transport:**

We have to put ourselves into a mindset where there is no oil and consequently there is no need for the A96 to become dual and for roundabouts. Instead, I see a priority for two generous sized cycle paths. One for tourists, going along the sea front, and another alongside the existing road.

We might even have to be looking at horses for transport again. Who knows what the future will be? We have to keep an open mind.

If the worst happens and these developments go ahead then extra urban train stops would be good - this applies to the south line as well. The Plan is short on detail of what the public transport will be and how it will be placed.

#### **Employment**

Where are the extra people of Tornagrain and Nairn going to work? Already Nairn is a little run down. The airport will not be able to expand - in fact, sadly, air travel will become greatly restricted in years to come. Low intensity farming does use more labour than intensive farming and once the need for local food becomes imperative, prices for food will be able to increase, hopefully, and the farmers consequently able to employ more people, but not the population of a town of Tornagrain's size!

## **Caithness and North Sutherland**

### **Q8**

**Marine renewable energy**

**Wonderful that marine renewable energy is going to be developed here.**

**World class tourist centre at John O'Groats**

**This fills me with horror. As someone who travels a lot, the last thing I enjoy seeing is great big tourist centres. The reason why I love the Highlands is because of its naturalness and I know this is true of many, many tourists. Once you've seen one tourist attraction, you've seen them all, no matter where they are in the world. Let people who like this kind of thing go to Disney land and leave the Highlands for tourists with more discerning taste and build on attracting these kind of tourists.**

## **Easter Ross and Nigg**

### **Q9**

**Without any definite plans for what will happen at Nigg it is not possible to comment on whether its development is a good idea. Certainly, it would be good to see something to regenerate the area, but small and local are the key words - maybe also moving some of the council's functions out to Invergordon?**

## **Conclusion**

**Very difficult times are ahead of us, especially for those in power who are going to have to face displeasure from the general population as they make difficult decisions. However, better to make these decisions now while there are resources available to ease us all into a life without oil.**

**We will have to take a lead from how people lived in the Highlands in the past and also accept a drop in living standards. An interesting movement has emerged to help communities come to terms with, and find new approaches to, a life without oil, and that is the Transition Town movement. Transition Town Inverness is in the process of being set up and there are more active groups in the Black Isle, Forres and Nairn. As I said earlier, communities in the Highlands lend themselves well to more sustainable, co-operative ways of life, but there is no mention of it, with intent to act, anywhere in the Highland Wide Local Development Plan.**

## **A post-oil world gets less sci-fi by the day**

**Dwindling supplies and no plan B – are we heading for Mad Max scenario?**

by Ashley Seager in [guardian.co.uk](http://guardian.co.uk), Monday 26 October 2009

It is 30 years since the film Mad Max was made, launching the career of Mel Gibson.

The film made a big splash at the time for its terrifying view of a world without oil, where gangs of grisly looking people roam deserts in a post-apocalyptic world, killing each other to get their hands on the few drops of petrol that some have managed to produce in makeshift refineries. Social order has completely broken down.

Great film if you like that sort of thing but complete fiction, of course. Or is it? Three decades later, and I wonder if the film was, in fact, years ahead of its time.

Just think back to summer last year when oil prices spiked to \$150 a barrel – 10 times the level of a decade earlier. In petrol stations in some European countries, people started to drive off without paying and drivers had to be banned from filling cars before they had paid up. In Britain, people stole heating oil out of the tanks that sit outside many houses in the country.

Imagine what would happen if prices rose, say, to \$300 a barrel. Or higher. Not only would it become too expensive to drive unless absolutely necessary, but food would become prohibitively expensive to transport, goods from China would be too expensive to ship, and plastics, which come from oil, would be unaffordable. The cold turkey after more than a century of cheap oil would be painful indeed. For developing countries it would be fatal – many could not afford energy at those prices.

Oil has fallen sharply in price since last summer, but this is only because the world tumbled into its worst recession in decades, clobbering industrial output and trade volumes, and therefore oil demand. What is curious, though, is that oil prices, having tumbled below \$40 earlier this year, went back above \$81 a barrel last week, their highest for a year.

There are plenty of possible reasons, such as the continuing fall in the value of the dollar, in which oil is priced, or the piling in of speculators who think a recovery will push up oil prices. Or you could reach for the old chestnut of supply and demand. Demand has fallen a lot, sure, but maybe supply is not what it used to be. Indeed, take a graph of the oil price over the past couple of decades, chop off last year's spike to \$150 and this year's plunge to \$35 and you can see that oil prices have been on a steady upwards trend for a decade. The question is why?

An excellent new report, *Heads in the Sand*, released last week by the non-governmental organisation Global Witness – the group that first brought "blood diamonds" to the world's attention – looked in depth at what is happening to the supply of oil. And it is frightening.

The author, Simon Taylor, has spent two years working on this issue, in particular, analysing the forecasts issued late last year by the Paris-based International Energy Agency (IEA), in which it admitted for the first time that world oil supplies were about to start to dwindle just as demand from countries such as India and China is accelerating rapidly. The IEA had previously asserted that oil production would not peak before 2030 at the earliest. Now it thinks we might be very close to that point.

The IEA figures showed there could be a gap of 7m barrels a day between supply and demand by 2015. That represents about 8% of the expected world demand by then, 91m barrels a day. The gap will grow as demand keeps growing. Taylor warns that world supply levelled off between 2005 and 2008, so quite where the new oil is going to come from is unclear.

Taylor takes issue with the IEA's recommendation that the world spend \$450bn (yes, billion) a year looking for new oilfields that may or may not be there and so render its forecasts overoptimistic. He

thinks governments should admit they have ignored the problem and don't have a plan B.

### Falling production

They certainly need one. Britain's oil production, for example, has already fallen by half in the past decade and the IEA expects production from all other existing oilfields to fall by that amount between now and 2020. It warns that the world needs to find an extra 64m barrels a day of capacity by 2030 – equivalent to six times the current Saudi Arabian production. That seems unlikely given that new oil discoveries peaked in 1965. In 1984 world production overtook new discoveries for the first time.

Taylor also points out that the announcements of "big" discoveries by the oil majors in the past few years do not add up to very much – less than 2m barrels a day – and only if those fields contain as much oil as the companies reckon. But even then they still fall a long way short of replacing the 3.7m barrels a day the world is losing every year.

Many people think Canadian tar sands are going to save us. Well, even the Canadians don't think they can produce more than 3m barrels a day from the tar sands of northern Alberta.

This is nowhere near the scale of the problem, quite apart from the environmental degradation caused by tar sand extraction.

Taylor said the four key issues about oil – declining output, declining discoveries, increasing demand and insufficient projects in the pipeline – have been apparent for at least a decade. It won't surprise you to hear that our own government has done no work on future oil supplies, has no plan and barely acknowledges the problem, despite years of campaigning by, among others, the former oil industry geologist-turned solar power entrepreneur Jeremy Leggett, who has written whole books on the subject of "peak oil".

### Renewables 'revolution'

Taylor says governments must move at lightning pace to reduce energy demand through greater efficiency and go hell for leather for renewable energy sources, although he knows it is probably too late to avoid a huge energy crunch within the next decade or so. That annual \$450bn the IEA talks of would buy you a lot of renewables such as wind and solar power if it were not being spent chasing ever-harder-to-find oil and gas.

So what chance is there of the authorities moving quickly? Well, Britain's renewables "revolution", which the government loves to talk of, is simply not going to deliver the goods. In mid-October the Department of Energy and Climate Change closed the consultation on the "feed-in tariff" proposal it has been forced to introduce by backbench MPs. Feed-in tariffs have kickstarted renewables in many countries, especially Germany, by offering consumers a healthy price for electricity they feed into the grid.

The energy department will announce its decisions in about a month but, unsurprisingly, officials are aiming low. They want the tariff to offer returns on investment of 5-8%. That's not enough. The Germans get around 10%.

The MP Alan Simpson, appointed by the climate change secretary Ed Miliband to oversee the tariff's introduction, wanted 12% or more to allow the UK to bring about a renewables revolution. But he has been thwarted by officials. "It's designed to fail," he says.

And people who have already invested, and got one of the handful of grants available in recent years, are likely to be worse off under the tariff. This means that early adopters of these technologies, who put their hands in their pockets to the tune of thousands of pounds, will be penalised. You really couldn't make it up. When the oil supply crunch comes, we are in trouble.

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## **A farming revolution is needed**

**We need political and social policies rather than agricultural ones alone, writes Tim Lang.**

By Tim Lang

Published: 8:30AM BST 11 Aug 2009 in The Telegraph.co.uk

The key issues of food production divide the present Labour government just as they divided the last Tory one, and – who knows – they may well divide the next. Do we feed ourselves or do we allow others to do so? Do we need farmers or do we assume that we are rich enough to buy on open markets?

Is the priority to keep food cheap or to lower its carbon footprint and the cost of diet-related health care? Are consumers modern gods, or should they have their choices restricted before they even see the food on shelves?

Answering these questions is tricky. The Government thinks food supply can be managed by trading gains on some scores for losses on others. I don't. The only future for us and the planet is to put food systems, both here and globally, on a sustainable course. It's sustainability or bust.

That's easy to say but if we are to achieve it, new priorities will be required, such as soil conservation, setting aside land for food rather than houses or motorways, eating differently and accepting a choice of 7,000 items in supermarkets not 30,000.

For the past two decades, British food production has gently declined. From a high point in the early 1980s when we produced 80 per cent of our own food, self-reliance is back to the levels at the end of the Second World War.

Neo-liberals are not worried. In the Treasury, some parts of Defra, and across the political spectrum, it's common to hear the view that Britain is rich, can buy on world markets, and ought to concentrate on delivering only what can be grown, processed and sold efficiently.

Efficiency is god. A subtext is that farmers are trouble. They cost the taxpayer big money, not least in bail-outs: think BSE and foot and mouth. Social liberals see this as an opportunity for our near neighbours to feed us, not just in the EU but particularly Africa, where land and labour are cheaper. The problem is that this ignores the new fundamentals coming into play: climate change, water shortage, land pressures, a rocketing population, energy uncertainties, the loss of soil fertility and biodiversity and urbanisation on an unprecedented scale.

Today there are next to no food stocks, either globally or nationally. The 30,000 items arrive in supermarkets through just-in-time delivery systems, laser bar codes, computerised logistics and satellites, all held together by tough contracts and international food purchasing lines.

That's the hidden labour behind the juggernauts belting up and down our motorways. Food accounts for one in four lorry movements on British roads; half of those trips are empty. We throw away up to 30 per cent of the food we buy, but the system wastes energy, land and labour, too.

And here's where the politics gets tricky and crosses party boundaries. Modern food systems were heralded half a century ago as banishing waste, bringing down prices and increasing choice. They have done that, but only by displacing the waste elsewhere in the system, and the costs have simply been externalised – dumped on to the environment or health care bills (all those cheap calories making us fat).

The political parties are united in vagueness, so what can be done? The Common Agricultural Policy will be key. Despite seeming government hostility to the CAP, British resilience is now EU dependent. We are increasingly fed by Europe. So getting Europe to adopt a sustainable food policy has to be a priority.

Some think genetic modification could be the technical fix for today. But even the most gung-ho GM supporter knows that it cannot resolve the new fundamentals of food, principally climate change.

That's because the problems need political and social policies rather than agricultural ones alone.

For the British diet to be sustainable, it will have to lower its carbon and water footprints. That probably means a big reduction in meat and dairy, but more fruit and veg; fewer animals reared on cereals (using the land twice over) but more fed on grass, which allows them to lock carbon into the soil. Some argue that this more labour-intensive food system could be good for jobs and biodiversity. Let's hope so. The current system cannot go on.

Tim Lang is Professor of Food Policy at City University London