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27 November 2009

Development Plan Team
Highland Council

Dear Sirs,

I enclose addenda to which I referred in my initial response of 8 November. Items marked ** therein are covered in these addenda and a note on the Glossary.


I have found the Main Issues Report a difficult document to address because of the disparities in approach and detail offered over the wide range of issues; the fact that the geographical areas covered alter between subjects makes it impossible to compare like with like.

These addenda are not intended to replace my three main concerns already expressed as to:

- i) the inadequate consultation process, and in particular the lack of sufficient documents to enable all those directly affected to have the opportunity to respond;
- ii) the non-compliance of this report with the requirements of the Town and Country Planning (Scotland) Act, 2006, section 17(2), and now the unwillingness/inability of the Development Plan Manager to address or explain this crucial inadequacy; and
- iii) the authors' perception of the purpose of development.

Questions of funding have not been adequately addressed in this report to an extent which renders it impossible to make informed judgments. It is clear that a great deal of council taxpayers' money has been expended over the past five years on exclusively addressing the A96 Corridor preferred option. I feel that taxpayers region-wide are entitled to know what the sum expended to date has been and whether Highland Council intends to spend proportionately similar sums on the rest of the region..

Yours faithfully


MRS E. HOLLAND

| H.C. PLANNING AND DEVELOPMENT SERVICE | | |
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Addendum 1

My suggested option for West Highland area in the context of Highland Region as a whole:

The imbalances and inconsistencies in this MIR are such that, if the Preferred Options were to be followed through, we would ultimately achieve a wholly depopulated west and north of Highland Region, a loss of all quality agricultural land in the region, and a small sector in the south-east of the region so densely populated (by the aged, the unemployed and public servants) as to be a character-less mass of urban sprawl. The effect of this scenario on tourism - our major economic basis throughout the region - would be catastrophic.

The clearest imbalance is between the proposed over-development of the A96 corridor (which has already been heavily developed over the preceding 20-30 years) and the vague generalisations about minor development to the west and north. Inverness is portrayed as being unable to develop to the north and west due to the so-called inadequacy of the Kessock Bridge and the lack of a canal crossing in Inverness. I am not persuaded that this view is supportable but, if one assumes that such an impenetrable barrier exists, it is perverse then to argue that massive development in the A96 Corridor behind this perceived barrier is of vital - or, indeed, any - importance to the rest of Highland Region.

I offer a few suggestions on how this imbalance could be redressed in the west. First, reduce the development planned for the A96 Corridor to reasonable and non-destructive proportions, at a level acceptable to its residents, and devote a larger share of public money to the under-developed west.

There are three main issues which must be addressed simultaneously: transport, jobs and housing. They must be looked at in light of present global circumstances. Use of truly renewable energy, carefully guarded water resources and efficient waste disposal are fundamental requirements.

TRANSPORT

There is a pressing need for better communication both within Highland Region and between the Region and the rest of Scotland. The most effective way of achieving this would be improvement of the present north-south links between Highland and Perth, whether by road, rail, or a mix of the two. I would regard this as second only to the restoration, or new build, of the Forth Bridge. Priority should be given to research into this route, which I believe is on-going. There could be inducements to move heavy freight by rail, resulting in considerable reduction of congestion on the A9. Improvement of

the A82 could then provide an alternative route to the Highlands, avoiding the current bottleneck of Inverness.

JOBS

The policy of establishing heavy industry in the Highlands has proved a costly failure over the years, but the setting up of small industries reliant on local resources (e.g. mussels on ropes, fish farming) has proved more successful. It is time to expand (but to avoid over-exploitation of) what is proving useful and to bring in larger projects related to natural resources.

Renewable Energy

With Scottish Government's current disapprobation of nuclear energy, there is an urgent need to research truly renewable energy sources. A major source is tidal (as distinct from wave) power. There is a passing reference in this Report to the Pentland Firth but no mention of the rugged West Coast. When wind beat wave in the political stakes some thirty years ago research was going on at Belfast University into tidal power; this was not pursued due to cessation of funding. Research has also been carried out in Norway and possibly Japan. It might even at present be being pursued in some Scottish universities. Tidal energy is wholly renewable and is one of the most reliable of natural phenomena. The structures involved are for the most part built underground and would therefore have a minimum impact on their natural surroundings. The Sound of Sleat might be a starting point. Would UHI, alone or in conjunction with other Scottish universities, be able to set up an appropriate research project? Encouraging results in an undertaking of this nature would also enhance its academic profile. I believe there is a passing reference in NPF2 to cable being laid on the West Coast seabed to transport electricity south - this is certainly more eco-friendly than having pylons marching across national parks. Could these projects be linked? These would only give large-scale employment in the short term, but they could provide quality long-term jobs.

Use of sea and seashore

Related to foreseen world food shortages, scientists are investigating krill and algae at or near sea surface as potential food sources. With the warming of our coastal waters algal blooms are occurring further north than previously. Is UHI taking part in this? If not, could it? Seaweed is a substance used extensively in 'green' cosmetics and also used as a natural food additive. Are we making use of our resources?

Fish farms were recently reported to be successfully using larger cages in deeper water. This seems to provide a better quality product with less danger of spreading disease to wild stocks, always a concern for salmon rivers. I understand there is an excellent example of fish farm management on Loch Torridon. Retaining high standards must accompany any expansion.

On land

This is the difficult one. On a recent visit to Gairloch I was told "organic growth is what is needed". That seems fair comment and it is something which could be encouraged by government, or by pump-priming from Highland Council. Despite world-wide financial problems, niche markets appear to be flourishing. Here are a few suggestions:

Single malt distilleries: one recently launched was seen on TV, where their spokesman said he could have sold his first year's output ten times over and that there was considerable overseas interest in single malts.

Natural ingredients are being increasingly used in the cosmetics industry, often in comparatively small quantities. Eco-friendly manufacturers seeking quality control and reduction in their carbon footprint are keen to source in the UK and crofters might find this worth pursuing.

Highland cattle and Soay sheep could perhaps be marketed for their distinctive flavour and quality.

Increased honey production. Struan Apiaries does well, but there is an increasing world market with in recent years severe world shortages due to problems in China, New Zealand and elsewhere.

Services have declined with falling population. Restoration of some services could help to turn the situation round. Could UHI improve/increase its vocational pathways at Fort William and Lochaber? Could more be done with dial-a-bus services, particularly with the recent demise of post buses? The withdrawal of services from Broadford and Belford Hospitals should be reversed. The continued withdrawal of services back to Inverness is a negative policy which has to be addressed.

HOUSING

This should be linked with job availability. Here the under-developed West and the over-developed A96 Corridor share a major problem which it is the duty of Highland Council to address: the increasing proportion of "economically inactive" households - the holiday home owners or the retired, who may bring a disproportionate social and economic burden to the area.

The scale of the natural surroundings in the West is suited to unobtrusive development and such development should be optimal for the area in terms of size and use of resources in a truly sustainable way. (See note on glossary.) Self-build schemes should be considered as should truly affordable housing. Small developments which form extensions of existing communities should be encouraged. The use of small local builders in preference to the large construction companies should be encouraged as it could enhance longer term job prospects.

Cost of building land: this is an important aspect of the affordable housing problem - also one of the most unfair situations it is possible to create. Therefore a regional council's power to re-zone land needs to be subject to public scrutiny, and a well-founded need for re-zoning must be established. This has not been the case with the A96 Corridor. The power to alter land designation translates into a power to hand out blank cheques to some lucky land-owners (often councils themselves or other public bodies) and must be seen not to be misused. At the same time, other landowners may be required to give wayleaves or submit to compulsory purchase. Highland Council rightly wants to see a fairer Highlands. If this is to be achieved, it is vital that such powers are exercised only where there is proven need. They should not - unless there is overwhelming need - be used to re-zone productive arable land.

For any planning permissions granted (and this goes for the A96 Corridor or indeed any development in Highland) there should be a condition that sufficient water is already sourced or will be provided at the sole expense of the developer; that the energy supply will be sourced from renewables (geo-thermal, solar, air pump, or similar); and that waste material will be used for power generation. See Note on Glossary - meaning of 'sustainable'.

My suggested option for Caithness and North Sutherland

In general terms I would make the same suggestions as for West Highlands. There should be jobs-related development in existing settlements and the jobs to be expanded would probably vary in kind from West Highlands, fewer connected with sea and seashore but more with expansion of small businesses already in the area. There could be more jobs in forestry, and here type of tree grown requires consideration. The side-effects of growing vast tracts of single species such as Sitka spruce are now acknowledged; while pollarded willow, with its very pale foliage, can reflect sunlight back into space, which could be a factor in terms of climate change. Depending on results of renewable energy research, a future nuclear power station might be required. Rail freight traffic should be encouraged with perhaps short double track sections between Lairg and Thurso planned as the population rises. Improvement of educational and medical facilities with a clinic at Golspie or Brora are highly desirable. Again the policy of withdrawing facilities to Inverness and down into the south-east corner of the Region should be reversed forthwith.

Addendum 2

The A96 Corridor with particular reference to Croy, its hinterland, and other smaller settlements.

My general view is that the type and density of developments proposed for the A96 Corridor are in spatial, environmental, economic, social and cultural terms wholly inappropriate for, and inimical to, the present thriving rural community lying between Inverness and Nairn. In particular, I object to the attempt to develop on some of the best agricultural land in the whole of Highland Region. If a proven need for future development were to be established (and none has been convincingly advanced to date), development should take place at either end of the corridor and certainly not in the central area. Any housing development should be identifiably long-term job-related, and any development infrastructure should be in place before development starts. Where the size of a proposed development would necessitate greater infrastructure (in size or extent) than would otherwise be required in the locality, the developer should pay the entire cost difference between the two.

There are fundamental problems to be solved before development proposals can be taken forward. I would have expected Highland's "strategic" consultant to have addressed these first. The most important is water. The A96 Corridor does not have the resources to provide potable water to meet proposed development needs. There has been no identification of where this water would come from, and therefore no assessment of the impact on the area sourcing the water or on the lands through which the water would be conveyed. There is no indication that waste/sewage is to be treated or recycled on site, so this too has to be removed to another location for others to cope with - a rather strained concept of 'sustainable' development.

In order to press forward massive corridor development both the Council's strategic consultant and the authors of this Report have disregarded and/or distorted the admirable principles set out in "Planning for Rural Development SPP 15" of February 2005. Some examples of the conflict between stated Scottish Government policy and corridor development policy are as follows:

"The Planning Vision 5. The intention is to have vigorous and prosperous rural communities, ranging from small towns and villages to dispersed settlements. The countryside should be able to absorb more people content to live and able to work there. "

This accurately describes the present position in and around Croy, which has seen and successfully assimilated an approximate fourfold growth over the past 20-30 years. This success has been due in large part to the welcoming and outgoing nature of the original community. "If it ain't broke don't fix it. "

"The clear goal will be to maintain the viability of existing communities and bring new life to many places which have seen years of decline."

The shoehorning of a new town into the centre of a group of active and closely inter-related settlements can only be disruptive and job-threatening. I enclose a diagram to illustrate this point (Tornagrain: Blueprint for the Destruction of a Rural Community) - with apologies for the quality, due to my poor sight, but I think the meaning is clear. There are "many places which have seen years of decline" in the north and west of the Region, and their problems Highland

Council has all but ignored in this Report. They would be further marginalised by development of the A96 Corridor.

"New Development 10.In the more accessible and densely populated areas most new development will continue to be in, or adjacent to, existing settlements."

So why the change of policy at Croy, whose joint hinterland with Ardersier would be smothered by the implantation of a new town less than 750 metres from Croy's centre?

"Green belts will continue to presume against most new developments and play a key role in maintaining the setting and separation of towns and cities."

The corridor development plan suggests that the comparatively recent green wedge identified at Beechwood be built over as a campus for UHL. The original concept of UHL was, I understand, as part of a policy to regenerate the Highlands. What is the purpose of using good agricultural land to site a campus as geographically far away as possible from the area it was intended to serve? Students (and staff) travelling from, say, Fort William or Muir of Ord will face additional journey times at additional cost. The area around Petty Church at the western end of the proposed development is presently used by Inverness citizens, and others, as a green recreational area. With the proposed development, this would disappear.

"Economic Development 14. Tourism is of vital importance to the social, economic, environmental and cultural well-being of rural Scotland

Absolutely. It is because this area has adapted to include a major tourism element in its agricultural base that it continues to thrive. Highland Council would do well to emulate the model of this robust and caring community rather than seeking to replace it by extensive urban development. Tourists flying in to Dalriada Airport remark on their first view of green countryside, seashore and mountains. This is one of the few airports in Europe - perhaps the only one - to offer such a panorama, and it encourages people to spend a night or two in the Nairnshire countryside before going further north. Replace that with urban sprawl and people will not be able to flee over the Kessock Bridge fast enough. Do not destroy what has been built by the initiative and effort of local people - they have, after all, been introducing innovative agricultural practices since the 1770s at least.

I am pleased to see that "Planning for Rural Development" does not advocate - as the A96 Corridor Development Plan appears to - that existing settlements should bear the brunt of problems, e.g. disposal of waste matter, created by proposed new developments.

I note that White Ness appears as a key development area in the A96 Corridor. This is, of course, a site where the developers have been unable to meet a condition of the planning approval relating to sewage disposal but have nonetheless been permitted to proceed. The proposal was also approved although part of it falls within the perimeter of a MOD firing range. This does not inspire confidence in the present planning system in Highland.

The sketch of the Tornagrain site would be very misleading to someone unfamiliar with the area. There is no indication of proposed realignment and lengthening of the trunk road which

development at Tornagrain would necessitate. . . There is no indication that the development would lie immediately alongside Dalcross Airport and an industrial park, for the expansion of which a planning application has recently been submitted. All this, of course, is planned to take place on good quality (classes 2, 3.1 and 3.2) agricultural land.

The increased population of the last few years has brought with it increased traffic congestion, and upgrading of roads in the corridor is urgently required. Transport Scotland has recently stated that no major roadworks will be undertaken in Scotland until the new Forth Bridge is completed (i.e. at the earliest 2016). Development before that date would further worsen this problem. The possibility of realignment of the A96 resulting from proposed development is nowhere clearly addressed. . . Again, were this to ensue, the total cost of realigning the road should be borne by the developer. It could also give rise to new congestion problems for all those travelling to Inverness from Croy and any point eastward.

Questions which need to be answered on the A96 Corridor Development Plan include:

What is the basis for the proposed long-term four-fold increase in population in the A96 Corridor

Where will the assumed in-migration of 30,000 come from?

Where is the potable water source for this increased population?

What is the anticipated increase in the economically inactive percentage of the population?

How will jobs be provided for new householders? Facts are required here, not rhetoric.

Highland Region should be regarded as a coherent whole with linkages of mutual benefit between adjoining areas. Why therefore is there such pressure to rush headlong into A96 Corridor development out of step with the rest of Highland and without proper consideration of basic infrastructure requirements? Is there some as yet unrevealed purpose in all this costly activity?

Note on Glossary

This contains Report-specific meanings in several instances and I would like to highlight the following as I fear that where these terms appear in the text, unless one has referred to their specialised meaning, they could give rise to misunderstanding.

Hinterland This is not a definition I have come across before but I am prepared to accept it as a variant specific to this document. On this definition the entire hinterland of Croy, and most of that of Ardersier, would be swallowed up by development at Tomagrain.

Infrastructure This is an extraordinarily narrow definition. 'Infrastructure' is vitally necessary not just for development but for all Highland residents to maintain their present quality of life, and in some areas infrastructure is already inadequate. I would add the gloss that, if additional as opposed to already adequate infrastructure is necessary for development to take place, then the additional cost should be borne by those requiring the addition.

Sustainable It is widely accepted that there are many definitions of sustainability, and indeed a whole industry on the subject has grown up since Brundtland first advanced his concept. The definition of 'sustainable' offered in the glossary is both confusing and confused. By what standard does one judge that a project has resolved, rather than merely tackled (whether successfully or not), the long-term problems it may create for others? I would regard a truly sustainable project as one which will not inflict burdens or problems on others (by which test the options offered in this Report signally fail). From the scant information available on options it is not possible to determine what energy sources they intend to rely on, and it is thus misleading to describe them as sustainable. - they may well prove not to be. There are insufficient safeguards and standards propounded in this Report to give "sustainable" a clear meaning.

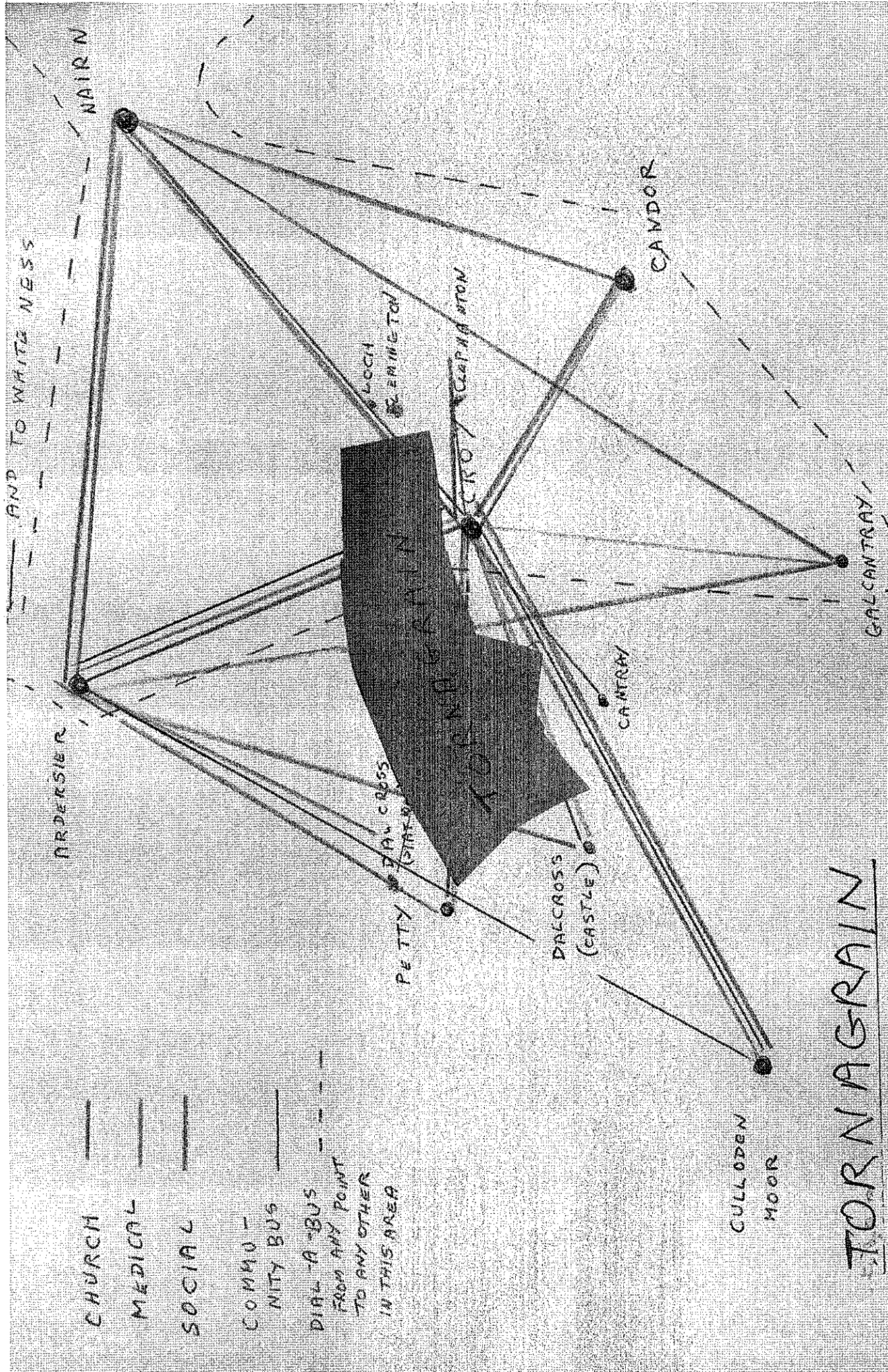
CHURCH

MEDICAL

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COMMUNITY BUS

DIAL-A-BUS
FROM ANY POINT
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TORN AGRAIN

BLUE PRINT FOR THE DESTRUCTION OF A RURAL COMMUNITY

