

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

Reference Number:	<b>HWLDP-MIR-197</b>
Organisation/Individual:	Anne Thomas

### Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
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	x
Vision for the Highlands	x
Inverness and A96	x
The A96 Corridor	
Phasing of Development	
Developer Contributions	x
East Inverness	
Nairn	x
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	x
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	x
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	x
Natural, Built and Cultural Heritage	x

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	x
Flooding	x
Waste Management	x
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	x
Forestry and Woodland	x
Minerals	
Open Space and Physical Activity	
Access to the Outdoors	x
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

### Key:

Background	Spatial Strategy	Policy Options	Consultation
------------	------------------	----------------	--------------

### Notes:

Climate change and peak oil should be better considered  
 Solar panels not mentioned  
 Road transport over-emphasised  
 A key question is what effect will climate change have on this site? – Expansion of Inverness and A96 corridor too dependent on air and road transport  
 Developer contributions essential for sustainability e.g. Merton Rule in London  
 Other comments focus on flooding/waste management specifically in relation to climate change.

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

**Simon Hindson**

---

**From:** Anne Thomas [REDACTED]  
**Sent:** 08 November 2009 22:22  
**To:** devplans  
**Subject:** Response to Highland Wide Local Development Plan

Please find my response to this plan.

Anne Thomas  
Drumsmittal Park  
Drumsmittal  
North Kessock  
Inverness  
IV1 3XF  
[REDACTED]

---

This email has been scanned by Netintelligence  
<http://www.netintelligence.com/email>

---

## **Sustainable Development and Climate Change- A Response to the Highland Wide Local Development Plan**

Climate Change and Peak Oil are the greatest challenges our civilisation has ever faced. In my view the sustainable development section should therefore be right at the beginning of the document since it is fundamental to everything else discussed.

P33 asserts that the Scottish Government's Highland and Islands Enterprise strategy is aimed at increasing the population growth of the highlands to 500000. This is more than double the current population. Whilst it can be argued that historically before the clearances the population was of this order of magnitude and was sustainable, the population then was dispersed in small self sufficient communities and the standard of living was often far below what would be considered adequate today.

Is there a need for this scale of population growth? The population of the UK as a whole is increasing and Scotland will need to absorb some of this. The less populated areas are obviously prime targets for this. In addition even in the best case scenario of keeping global warming within 2 degrees, there will be massive pressures for migration due to the flooding of low lying islands and coastal areas and the desertification of large areas currently inhabited. We in the developed world who have caused most of the pollution leading to climate change have a responsibility to offer a haven to those we have made homeless. Northern Scotland will be a prime target for migration as the planet warms. It is therefore likely that in the 20 years covered by this plan there will be much more likelihood of a high migration scenario.

If we are aiming for an 80% cut in CO2 by 2050 but a doubling of population, we are actually talking about each person producing only 10% of what they currently do. This is achievable only with an enormous effort in every area of the plan. More aggressive cuts earlier in the period mean we have a much greater chance of staying within the crucial 2 degrees.

### **Renewable Energy**

The renewable energy section fails to mention solar panels at all. Whilst wind or marine generation will generally be much more efficient in generating electricity than photovoltaic solar panels in Highland there is a need to make far more use of passive solar in buildings being required to have large south facing windows and sufficient windows not to need the lights on in the day time. This can save up to 30% of a building's energy requirement. Solar thermal panels for both domestic heating and any commercial building requiring hot water are very efficient and should be a requirement for all new builds and major refurbishments where there is a suitable south facing roof. They can also be used to supplement other heating systems.

The 'areas for significant protection from wind farms over 20MW' seem to have been made without reference to where would generate the maximum energy and be easiest to connect to the grid. The area round Dounray would be an obvious place which is windy and already has high voltage lines. In addition it is suffering lack of jobs and income and wind farms would bring welcome capital to the area as well as encouraging the population to stay and maybe expand in this area rather than the Inverness and A96 corridor. However this is blighted by large areas where there is a 'presumption against'

### **National Planning Framework 2 for Scotland and the Highlands**

This summary is very road focused. It assumes current and even increasing use of road transport. If we are to have any hope of tackling climate change we need to reduce this. A brief mention of rail lines south and east is not enough. There is enormous potential for upgrading the very poor lines East and North as well. If these were improved and promoted there would be an enormous tourist potential as people increasingly become unable to afford foreign travel as the price of fuel goes up and look towards the fantastic local scenery nearer by. This would also enable economic improvement in the

communities to the North who are currently 4 or 5 hours by train from Inverness. In addition the sleeper service should be expanded to the North. It is completely unacceptable to have a service that uses 40 year old rolling stock, does not run on Saturday and has no berths left 2 weeks before travel in October. It should also allow flexibility of people alighting elsewhere than London on the way south. The current system smacks of colonialism and is designed for people to escape from London rather than for the benefit of Scots.

People will not be able to afford anything like the current level of car and road transport use as oil prices rise, so road improvements are unnecessary and the investment needs to be diverted from roads to rail and cycle paths.

### **The Vision for the Highlands**

Yes, a sustainable Highlands is absolutely the right vision but 'business as usual' economic growth, farming and transport are not going to achieve this. As oil prices rise due to peak and then declining oil production and increased demand the Highland economy will become increasingly vulnerable.

We need first to look at how we feed ourselves. Building should not be allowed on prime organic agricultural land as in the Tornagrain proposal. In addition the main focus of Highland Agriculture should in the first instance be to feed the local population using as low carbon methods as possible and then looking at food and biofuel needs for the rest of Scotland. Transporting products to the other side of the world can never be regarded as sustainable and growth involves more use of resources which are rapidly depleting. Less intensive methods would require a larger workforce, which would reduce unemployment and also encourage migration back to rural communities. There needs to be a discouragement of buying 'holiday cottages' for occasional weekend use towards having properties that are used all year, so increasing availability and reducing cost for local people.

### **Q 1-8 Where should growth go and how can we deliver it?**

A key question in all planning is what effect will climate change have on this site?

Scientists are constantly revising their forecasts for sea level rise as the ice melts faster than expected and feedback loops as from melting permafrost releasing methane kick in. It must also be remembered that for each meter sea level rise there is a risk of storm surges being at least twice as much. Any site that is near sea level or in a current or potential future flood plane should be rejected. In addition many communities in Highland are accessible only via road and rail links that run along the coast.

Expansion of Inverness and the A96 corridor is heavily dependent on the airport and road transport. Ever expanding conurbations on prime agricultural land are not sustainable. Nor are more and more large supermarkets which kill vibrant town centres as Tesco has done to Dingwall. Wherever possible development should be on brown field sites in small communities with smaller scale shops and local businesses serving local people and stocking local goods. Development should have the minimal footprint e.g. terraced housing with space available for gardens and allotments so that people can grow some of their own food rather than less energy efficient bungalows squashed close together with tiny gardens. They should be south facing to collect passive solar and have solar panels on all south facing roofs.

Nairn is an example of a small town which retains local independent businesses due to the lack of competition from large scale supermarkets. Traffic going through is able to stop off at local shopping areas. A bypass might alleviate congestion at peak periods but could undermine the viability of the local shopping area. An alternative would be to support the already relatively high bicycle and pedestrian journeys by building more cycle routes and footpaths particularly in any new housing development. The lack of hills and compactness of current facilities together with supportive local schools encouraging cycling could

facilitate a much higher proportion of local journeys by cycle. In addition a more frequent train service between Inverness and Aberdeen would enable longer journeys from Nairn to be made by train further reducing congestion. It has been shown that the more roads are built the greater the traffic.

The focus of this document on Inverness and the A96 corridor, heavily dependent on airport links is not sustainable. The areas that need investment and have growth potential are in the towns to the north. The focus should be on locating and supporting appropriate businesses in these areas together with public transport links. There is a large potential for renewable energy in this area from wind marine and biomass. In addition the local agriculture should be re-focused on self sufficiency for this area and the rest of Highland rather than towards exports such as whisky and barley for animal feed. Housing development in these areas will be much more able to take account of brown field sites. In addition small expansions in each rural community will be necessary to enable the greater labour requirements of a post cheap oil agriculture.

### **Qs 3 and 18 Developer Contributions**

Developer contributor requirements are essential for sustainability. All new developments should be planned to emit one tenth of the current average CO2. This means very high energy efficiency and a requirement that a proportion of the energy requirement of the development is renewable. The 'Merton Rule' which has been operational for several years in the London Borough of Merton and elsewhere requires that at least 10% of the energy of developments over a certain size must come from renewable sources. Scottish Planning Policy (SPP6) on Renewable Energy. This states (page 10): 'The expectation should be that all future applications proposing development with a total cumulative floor space of 500 sq metres or more should incorporate on-site zero and low carbon equipment contributing at least an extra 15% reduction in CO2 emissions beyond the 2007 building regulations carbon dioxide emissions standard'. And shortly after that: 'the development plan process should be used to consider whether local circumstances justify going beyond 15%; below the 500 sq metres threshold; and whether higher standards can be secured for particular developments, including the potential for de-centralised energy supply systems based on renewable and low-carbon energy'. It also means heavy investment in public transport and cycle lanes and local facilities.

### **Q9 Easter Ross and Nigg Development**

Nigg does have potential for redevelopment for renewables, but only if it is taken account that it is just about at sea level and the sea level will not stay where it is for all that long. It will probably need to be raised by 2 meters as a minimum or an equivalent sea wall put in place. The site does have the potential to be supplied by the wind farm at Nigg hill if that is approved. If a substantial workforce is needed then public transport links need to be significantly increased.

### **Q12 Policy options for the Highland Wide Local Development Plan**

As mentioned previously, a high migration scenario is much more likely but high migration with severe food and fuel shortages means that we cannot afford development on prime agricultural land. The existing housing stock should be better used. Incentives should be introduced for not leaving properties empty or penalties imposed if they are. People should also be encouraged to take lodgers. Older people who are keen and able to stay in their own homes should be encouraged to trade down to a more suitable sized property or sheltered accommodation whether private or council owned within their local community freeing up larger properties for families. Some councils have already done this with council properties.

Any developments should be as close to zero carbon as possible. At least 25% should be

affordable throughout Highland.

### **Q 17 Retailing**

Retail developments on the ground floor of flats is a model that has worked well elsewhere.

Shopping in a low carbon world cannot continue as it does at present. There needs to be re-localisation at every level. Planning for this low carbon world should not include large chains reliant on enormous food and product mileage.

Planning needs to focus on how to get local food and goods to local people as efficiently as possible. Large supermarkets do not provide more jobs for the area. They simply force local businesses to close and suck the profits out of the area. It is a shame that people in highland seem to have swallowed the supermarkets' propaganda and cannot connect the demise of local town centres with the rise of big supermarkets.

### **Q23 Safeguarding Our Environment**

Renewable energy is very important to safeguarding the environment. Without it we cannot hope to protect any of the rest. The areas for protection from wind farms over 20MW are too general. Failure to tackle climate change will have a much worse effect on the environment than the visual impact of a few windmills. Lack of power and income will have a catastrophic effect on the whole of the Highland economy and consequently on the ability to care for the environment.

It is important that supporting infrastructure such as high voltage cabling is planned to maximise the potential for renewable energy. It is also important to improve pump storage capacity so that excess renewable energy can be stored without the need for conventional back up generation. Development of tidal energy should also give more predictability of supply.

### **Q25 Flooding**

The idea that any development on current flood planes should be permitted is ridiculous. Flood planes are only likely to increase with global warming, and coastal areas should also be out of bounds for the same reasons.

### **Q25 Waste Management**

Yes waste of all kinds should be seen as a resource. The hierarchy should be first of all refuse. Whilst recycling rates have been increasing in recent years so have the total volumes of waste. Recycling still uses energy even if it is a smaller amount than making products from raw materials. Next is re-use. Businesses trying to re-use e.g. by washing glass bottles are often met with such punitive health and safety requirements that it is simply not economic. What is collected for recycling is often transported long distances because of a lack of recycling plants in Highland. As far as I can discover there are no plants for re-cycling paper or plastic and the nearest cardboard recycling plant in Aberdeen has been mothballed.

Paper should be being recycled at least 10 times and then used for things like toilet paper whereas at present it is being recycled once at most. Our demand for paper is fuelling the deforestation in other parts of the world which produces 20% global carbon dioxide emissions, more than from transport. Use of schemes e.g. 'yo-yo' whereby a company takes back paper for recycling in empty vans used for delivery should be strongly encouraged as should reduced VAT for all re-cycled products. In addition dioxin bleaches in paper should be phased out so that it can be recycled without releasing these toxins. Business recycling is at present very poor in Highland as there is no financial incentive to recycle as companies pay the same rates if not more. This can only be tackled by an element of compulsion in much the same way that companies have been forced to clean

up air and water pollution.

The whole business model which rests on continual 'growth' being good and contraction being bad fails completely to take account of the fact that we are living on a finite planet with rapidly diminishing resources.

Energy from waste may have some place, but methane from anaerobic digestion would be a better option than burning. Incinerators burn valuable resources and even the most efficient subject surrounding communities to emissions. They risk tying people in to contracts to supply waste rather than recycling as much of this as possible. They have already been rejected in many areas of Scotland.

#### **Q26 Air Quality**

The air quality will not be maintained with a policy of encouraging greater road use through the building of more roads and increased flights. Emphasis on energy efficiency for all buildings, businesses and transport and transfer of both rail and road transport to electrical power fuelled by renewable energy will improve it.

#### **Q27 Sustainable Design**

I agree with the preferred option and this should be implemented as soon as possible.

#### **Q28A Competative, Sustainable and Adaptable Highland Economy Business and Industrial Land**

I agree that housing and businesses development should be done in conjunction with one another so as to reduce the need for commuting if work opportunities are located close to housing. However the current economic model of ever expanding growth is not sustainable if this simply means the ever increasing of more 'stuff'. Food security should have a much higher priority and this means re-localising and de-carbonising the food chain. Much more work in the future will need to be focussed on farming as fuel prices rise.

#### **Q28B Accessibility and Transport**

Improving road transport but further neglecting rail transport will not lead to reduced emissions. Any money available should be spent on rail and cycle provision. Greater use of public transport will reduce congestion and therefore need for more roads. As fuel prices rise, car travel will become unaffordable so money spent of road improvements will be wasted money. Cycle parking at all bus stops would be a fraction of the cost of park and ride schemes though these should be provided as well.

Sufficient buses and trains need to be provided at times that people actually need e.g. enabling journeys between Inverness and Edinburgh arriving before 10am and later in the evening.

Re-introduction of cycling proficiency classes for all P7s which were cut in recent years should be a matter of urgency.

Air transport should be reduced as fast and as much as possible. There is no place in a low carbon economy for its expansion.

#### **Q29 Agricultural Land**

Prime agricultural land should not be developed. We will need all existing agricultural land and more if we are to have food security and some biofuel in a post cheap oil world.

#### **Q 30 Crofting**

Crofting is likely to be an increasingly wise lifestyle in the future and should be encouraged however it is reasonable to allow another house on a croft as people sometimes need more help.

### **Q31 Common Land**

This should not be seen as easy pickings for developers. We will need more common land in the future as communities return to low carbon agriculture. We will also need more allotments so people can grow their own food.

### **Q32 and 33 New Crofting Communities**

These communities should be encouraged.

### **Q34 Coastal Development**

Coastal housing development is not sensible in view of rising sea levels. Marine planning is necessary, but it is important not to make it unnecessarily bureaucratic.

### **Q35 Forestry and Woodland**

An increase in woodland could help mitigate climate change but only if it is done carefully as planting trees in peat land causes this to dry out, increasing carbon dioxide rather than reducing it. It could also increase wood for biomass heating which would reduce the need for fossil fuels.

### **Q38 Access to Outdoors**

Provision of cycle paths should be given a very high priority, but these need to be linked through towns on routes people actually need. Footpaths should be sustainable not incorporating large drainage systems for peat-land as witnessed on Orkney this summer.

### **Conclusion**

Climate change is now upon us. We have already raised average world temperature by more than one degree centigrade, but in many areas, worryingly particularly at the poles, this is much higher. The carbon dioxide concentrations in the atmosphere are higher than they have been for at least the last 20 million years. When it was last this high there were no ice caps and the sea level was 7 meters higher. The science is very clear. We cannot continue business as usual and even if we wanted to peak oil means we cannot. We need therefore to urgently plan a low carbon future or 'Energy Decent Plan'. This has been done in many places already for instance <http://www.energybulletin.net/node/16859>. The Highland Council has a responsibility to respond to these issues. I strongly feel that the current version of the Highland Wide Local Development Plan merely pays lip service to the ideas of sustainability and is nowhere near as radical as it needs to be. We will fail to plan for our future or that of our children if we do not act to achieve this low carbon vision.

I am grateful to friends in local environment groups Friends of the Earth Inverness and Ross and Transition Black Isle for their input into this response.

Anne Thomas, Co-ordinator, Friends of the Earth Inverness and Ross.