

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

Reference Number:	HWLDP-MIR-76
Organisation/Individual:	Dr Alastair Noble

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 (<i>Please Specify</i>)	<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	x
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	x
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:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

Specifically objects to Sandown and Delnies proposals
 Comments on population figures – should plan on a very conservative basis
 Questions why development at Sandown will now begin without infrastructure (includes Halcrow study)
 Welcomes brownfield development
 Comments emphasis on elderly population

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

H.C. PLANNING AND DEVELOPMENT SERVICE		
04 NOV 2009		
PASS TO	INITIALS	DATE
AM		
MM		

Delnieswood
 Moss-side Drive
 Nairn
 IV 12 5PN
 2/11/2009

Dr Stuart Black
 Director of Planning and Development
 Highland Council

Dear Dr Black

Main Issues Report August 2009

Following on from our previous correspondence I will be submitting two separate letters about the Main Issues Report. This letter deals with the reference to our elderly population.

I am as you know very worried about our ability to cope with the demographic changes over the next 30 -40 years i.e. until the post war babies die off and the population goes back into better balance. The financial crisis will increase the pressure even further and the relatively smaller numbers of working age people will have to pay through taxation for both the Care of this elderly population and their pensions.

All the current planning is for an Integrated Approach involving Health, Local Authority, Private and Voluntary Sector. Highland could and should be well placed to make this work and take the Integrated Resource Framework forward. As you know Highland Social Work is struggling financially and is being critically looked at by SWIA. The last thing Highland needs is more elderly people as Highland cannot cope at present. The main issue Report seems to say thousands of new houses is good but if they fill up with elderly people it will only become worse. Developer contributions for roads, sewage etc is peanuts compared to recurrent revenue costs on Health and Local Authority for Care of the Elderly.

How do you plan to make sure that developers contribute on a long term recurrent financial way for all the elderly who buy their houses when first sold or on resale?

If you cannot ensure this then the safest way is not to allow them to be built in the first place.

The financial crisis is real and only starting to bite in the Highlands, now is the time for sensible and prudent planning.

Yours sincerely [Redacted]
 Dr Alastair Noble

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

Delnieswood
Moss-side Drive
Nairn
IV12 5PN
2/11/2009

Dr Stuart Black

Director of Planning and Development

Highland Council

Dear Dr Black

Main Issues Report August 2009

I have attended many presentations now on this Report and will enclose copies of my objections to the Sandown and Delnies proposals. These are relevant and likely to form the basis of my submission to the Reporter unless we see significant changes in the Local plan which will now be produced by your department following the consultations. I am submitting two letters on the Report. This one deals in general terms and the other concentrates on the elderly population.

The issues facing Highland are real and massive. This is not the time for aspirational planning based on the Jack Holmes wish list of the sixties. The economic reality is grim and likely to last for many years. Sustainability is the only way forward and the Local Plans will have to be grounded in reality and look forward 5 years at most now. Printing money has always led to inflation, high interest rates and large mortgage payments.

The Economic situation has changed and the new plans must reflect this. We must learn from the American, Irish, Spanish, Cypriot and Icelandic mess. Building houses that nobody can afford is not the answer. The Spivs and Speculators are not the way forward. Nobody has produced any evidence as to where any new jobs are to come from and we are looking at severe pressures coming on public sector jobs.

The forward population trends are as you know a wild guess at best. The birth rate is likely to drop in a recession and immigration trends are reversing with many people going home.

With unemployment likely to reach 3 million we do not need more workers. We should therefore plan on a very conservative population basis. Highland has plenty of land already zoned for housing and we do not need to zone any more at present. In particular we do not need to build on good agricultural land. In my extensive reading of your papers I am more confused than ever about how you plan your strategy. For example, an environmental report on the A96 work says very clearly that both the high quality land and the SSI on the Carse at Hilton of Delnies should not be developed. The Halcrow criteria were not met and

the Delnias proposals failed more than any other alternative .The public meetings were all against low density development and Halcrow 's answer is to propose medium to high density development. The main issue report, like the Tornagrain glossy publicity both then proposes development on Delnias.

There is an appeal by Deveron for a monstrosity of high density development on Common Good Land at Sandown part of which we were told was to be a wetland development. Above all we were told repeatedly (and this certainly is the public wish) there should be no development without infrastructure in place. We are now presented with a plan to start development without the infrastructure. How can we trust or even believe in the process when it is so riddled with inconsistencies, and open to the charge that this is all developer instigated and led.

At the more recent meetings we seem to be moving to brown site redevelopment and I welcome this. In the city of Inverness this should be higher density even high rise to save on agricultural land.

This plan is for all the highland area. The infrastructure is in place in all these areas with education, health, water.sewage, roads and social care. They may need improved but the fundamental question remains of why should we build massively on the A96 and depopulate the north and west when we cannot afford any new infrastructure. The A96 proposals are fatally flawed and should be the first to go in the realistic new plan. The plan should be supporting all communities in Highland.

Most of our jobs are tourist dependent and we should not be destroying the basis of our tourist trade with massive housing developments in the wrong places.

We should be regenerating our town and city centres and not allowing out of town developments.

We should be following green policies and not encouraging commuting.

Sandown should be a sensible well planned development if and when it is required, with the wetland to the south of the A96. There should be no south development until the infrastructure is in place. The same should apply to the east with Sainsbury's going to a redeveloped town centre.

We should also provide more council housing perhaps even by buying some of the many houses which are for sale to meet the demand for housing for local people.

I look forward to your much more realistic Plan and hope we can all work together to sustain all the good in the Highlands and not sell out to the developers who have been found so badly wanting in the current financial crisis

Yours sincerely

Alas



8. Preliminary option appraisal

Nairn South appraisal matrix

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Principle	Option				
	A	B	C	D	E
Environment	<p>Maintain and enhance open space, natural features and critical environmental areas and ensure these are provided within settlements and integrated into development that maximise their recreational contribution to the quality of life.</p> <p>Exceeds through extensive buffers and open space provision.</p> <p>Exceeds through sustainable outcomes are lost due to suburban low density and inappropriate open space.</p> <p>Fails as business proposals are isolated from other uses.</p> <p>Meets</p>	<p>Likely meet or exceed.</p> <p>Meets through clear landscape structure.</p> <p>Meets with solid core and other appropriately located allocations.</p> <p>Meets as development is integrated.</p> <p>Exceeds</p>	<p>Likely meet or exceed.</p> <p>Meets through clear landscape structure.</p> <p>Fails as business park allocation is not integrated.</p> <p>Fails as business proposals are isolated from other uses.</p> <p>Exceeds</p>	<p>Fails as proposals do not respond to Nairn layout.</p> <p>Exceeds through innovative community woodland proposals.</p> <p>Fails as sustainable outcomes are lost due to poor integration of allocations.</p> <p>Fails as poor integration prevents coherent mix.</p> <p>Fails</p>	<p>Likely meet or exceed.</p> <p>Meets through clear landscape structure.</p> <p>Meets with solid core and other appropriately located allocations.</p> <p>Exceeds as development is strongly integrated.</p> <p>Meets</p>
Economic Development	<p>Ensure land use is appropriate and that development uses sites to maximum advantage emphasising sustainable development.</p> <p>Promote a mix of land uses that allows houses and jobs to be closely related and the mix to be more varied toward the centre of places.</p> <p>Every new dwelling should have a new job created.</p> <p>Fails as low density allocations are excessive.</p> <p>Fails as low density allocations make good design outcomes more difficult to achieve.</p> <p>Fails as proposal is not responsive to attracting public transport.</p> <p>Meets through by-pass.</p>	<p>Fails as low density accessible urban core and substantial employment area.</p> <p>Meets or exceeds due to solid urban core and substantial employment area.</p> <p>Meets or exceeds due to integration and mix of uses.</p> <p>Meets through by-pass.</p>	<p>Fails as business proposals are isolated from other uses.</p> <p>Fails as business proposals are isolated from other uses.</p> <p>Fails due to isolated business park.</p> <p>Meets through by-pass.</p>	<p>Fails as allocations fail to relate density to transit accessibility.</p> <p>Fails as proposals do not deliver a sense of place.</p> <p>Fails as opportunities to promote public transport are not presented.</p> <p>Meets through by-pass.</p>	<p>Meets or exceeds due to accessible urban cores and employment area.</p> <p>Meets or exceeds due to solid urban cores and substantial employment area.</p> <p>Meets or exceeds due to integration and mix of uses.</p> <p>Meets through by-pass.</p>
Accessibility	<p>Address key road challenges including the appropriateness of the Nairn by-pass.</p> <p>Ensure accessibility through mobility choice by actively promoting attractive public transport.</p> <p>Meets through by-pass.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>	<p>Meets as a range of density is proposed.</p> <p>Meets as good recreational provision is made.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>
Community Inclusion	<p>Create a range of housing opportunities and choice and promote a range of housing density to achieve choice.</p> <p>Strengthen existing communities through the provision of services and opportunities for the wider community.</p> <p>Fails as density focuses on low provision.</p> <p>Fails as proposals do not respond to wider integration.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>	<p>Meets as a range of density is proposed.</p> <p>Meets as good recreational provision is made.</p>	<p>Meets with a range of density focused on a district centre.</p> <p>Meets through district centre provision.</p>

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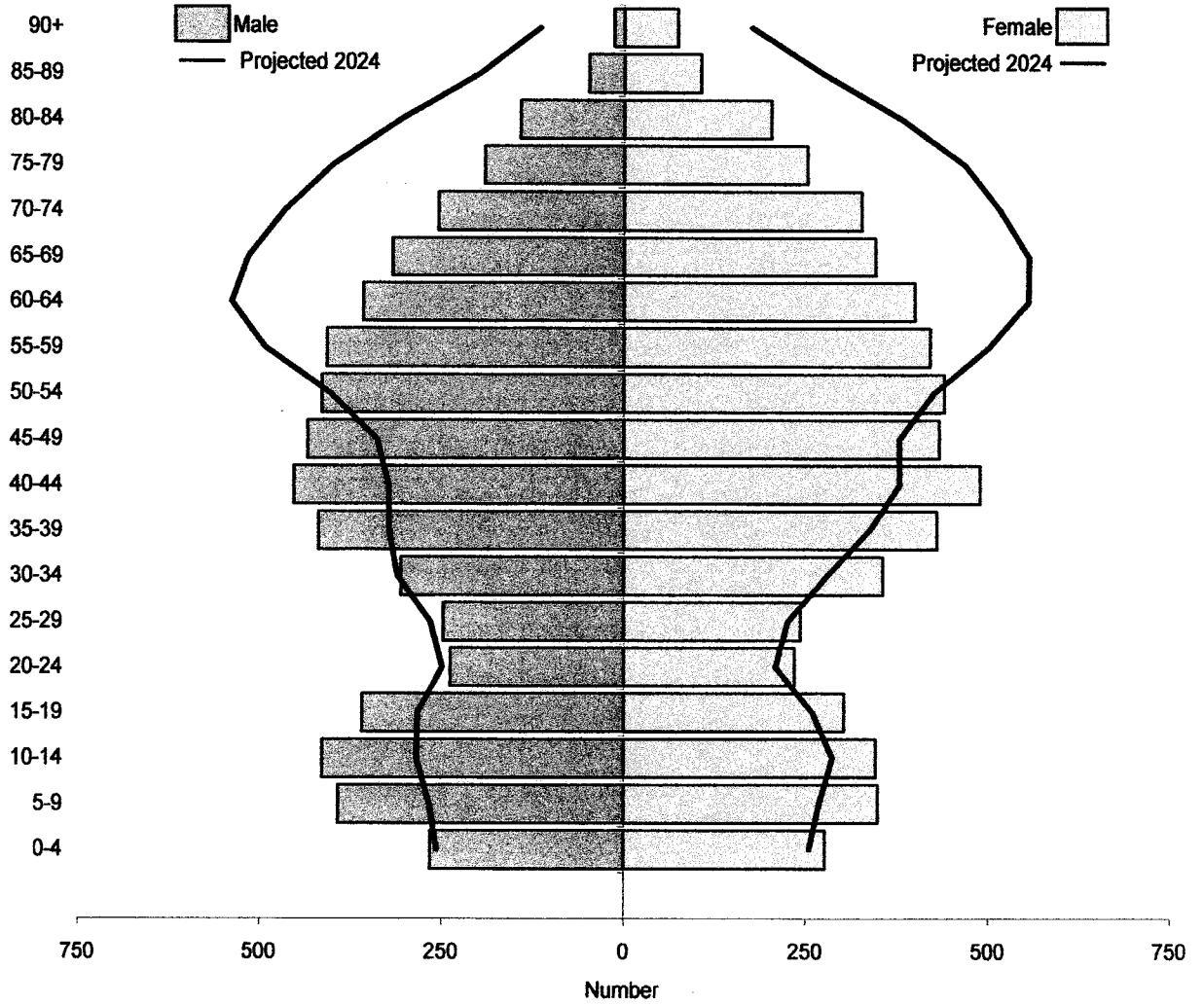
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HALCROW

Nairnshire population Current and projected to 2024



Delnieswood

Moss-side Drive

Nairn

IV12 5PN

1/6/2009

Dr Stuart Black

Director of Planning and Development

Highland Council

Dear Dr Black

Thank you for your letter of 26May .I appreciate your reply.

I will respond more fully in time but I think the Councillors reached the right unanimous decision.

I am keen to develop the joined up thinking referred to in para 8. The recurrent costs of our elderly population must be met before we add any more. I would be happy to help in the costing of these recurrent revenue costs which I think will dwarf any planning gain.

Best wishes

Yours sincerely

A black rectangular redaction box covers the signature of Dr Alastair Noble.

Dr Alastair Noble

Dr Alastair L Noble
Delnieswood
Moss-side Drive
Nairn
IV2 5PN

Our Ref: SB/EB
Your Ref:
Date: 26 May 2009

Dear Dr Noble,

Sandown Report to Committee Ref 07/00188/OUTNA

I refer to your letter dated 8 May 2009 addressed to David Polson, and to his holding response dated 11 May 2009.

I regret it was not possible to respond to your letter by 12 noon on 11 May as you had requested, but you will be aware that the application was refused planning permission at the Committee meeting held in Nairn the following day.

However, it remains appropriate to respond to your letter having discussed the content with David Polson.

David Polson accepted that there is a lack of trust in some quarters, but at no time did he acknowledge that "mistakes" had been made by this Service over the A96 Framework and that it was a "shambles". This can be attributed to your own view of the matter, perhaps, and that our views on this can differ.

Reports to Committee are written by the planning case officer involved, but are signed off by either the Area Planning & Building Standards Manager; the Head of Planning & Building Standards or myself. This can be verified by looking back through Committee agendas.

In discussions with you, David Polson did not see the Councillors' position as Trustees of the Common Good Fund as being a serious risk either to the Council or individual Councillors but recognised a public perception which misunderstood the respective roles and duties.

The safeguards lying in declaration of interests and the need for referral to Scottish Ministers cover this and were referred to in the Agenda and Committee Report; they were directly addressed in the public statement by the Clerk to the Committee prior to the Committee item being heard.

The answers to the specific numbered questions in your letter are as follows:

- 1) Yes, it is Common Good land but this is not a planning matter relevant to determination of the planning application.
- 2) This is for the Trustees to determine taking full account of the operating guidelines on administration of Common Good Funds and is not a planning matter relevant to determination of the planning application. The Common Good is any property moveable or heritable held on the Common Good Account and is "...the corporate property of The Highland Council and as such is to be administered by the Council and applied for the benefit of the community in such a manner as using reasonable judgement they think proper having regard to the interests of the former inhabitants of the Burgh".
- 3) As above
- 4) As above
- 5) The 550 house number was put forward by the Applicant as part of the application and is not a Council figure.
- 6) The existing Nairnshire Local Plan was adopted on 21 December 2000 and followed on from a Public Local Inquiry held in January of that year. Formal commencement was undertaken in March 1997. This means that the survey work on which the plan is based is now at least 10 years old. The draft Sandown Development Brief was prepared in August 2004 as an informal guide to those potential developers who were to submit bids for the land. This was to help ensure that each developer was given consistent advice, without prejudice.

Bearing in mind my answer to 5) above and the explanation set out in Andrew McCracken's Committee Report with which you clearly do not agree, I would not intend to comment further on the 550 houses proposed by the Applicant.

- 7) No. All Councillors operate as Trustees, and it was made clear at the outset of the Committee that this was the case, and that it was a non-financial interest. The purpose of the Committee meeting was to look at the planning merits of the application.
- 8) It is not for me to comment on the SWIA Reports. In relation to future demands, I must make it clear that had permission been granted for 550 houses, it is unlikely that it would be built out fully within the next 15 to 20 years. Over the last 9 years, rates of completions across the whole of Nairnshire have averaged just under 83.90% per annum of these (or around 75) have been in Nairn. One site would not be expected to accommodate all of this growth, while there has been the economic downturn.

Moreover the figure of 550 houses, as the indicative layout showed, involved greater density of development overall but concentrated in some locations. This is a reflection of change in housing demand. Certain sectors have been neglected in the "good" years, and there is a much greater need for a mix of housing types to address and accommodate all needs, especially for younger people. There is no direct relationship between the number of houses and the number of elderly people requiring services. It is a matter for the Health and Social Care Services to respond to future demands whatever these may be as they arise. David Polson acknowledged to you, however, there has been a move towards improved consultation and coordination in seeking appropriate infrastructure (in its widest sense – including Health and Social facilities) to accommodate growth scenarios in recent times, and this is something which the Council is keen to facilitate.

- 9) This is a matter for National Government and for the local Health and Social Care Services.
- 10) The Education Service was consulted on the application. School rolls fluctuate over time with shifts in the population age structure and migration patterns, and are monitored in conjunction with population forecasts produced by the General Register Office and the Planning & Development Service. The Council is aware of issues with individual schools and Nairn Academy in particular. These are being addressed and do not amount to reasons to refuse a development which would take some time to start far less fully develop.
- 11) Any fatalities would be extremely regrettable (whatever the reason for them), but as any site is developed which takes access along the A96, opportunities will be taken to ensure separation of through traffic and pedestrians, especially children.
- 12) The wetland field to the south of the A96 was included in the draft Development Brief, and part of the field was considered suitable for housing and part for safeguarding as wetland with some interpretive feature.

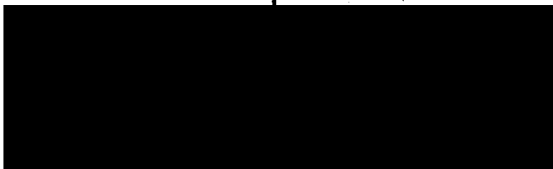
Regarding your conclusion:

- a) The Applicant can appeal within a period of six months from the date of refusal of planning permission.
- b) If approved, the application would have had to have been referred to Scottish Ministers because of the financial interest of the Council and since it involved a Departure from the Local Plan which could be considered to be significant.

David Polson cannot recall any specific discussion regarding the handling of the farm land tenancy or ownership (which is not a planning matter), and did not see that there was an insoluble conflict of interest due to the position of Councillors as Trustees for the reasons set out above and explained at the Committee meeting itself by the Committee Clerk and Chairman. Moreover, he cannot recall any discussion or agreement involving me writing to you on the procedure, and circulating your letter and my response to the Committee, as your final paragraph suggests. Unfortunately, the first indication of this was receipt of your letter.

I hope that this response has helped to address the points you raised and I apologise once again for not meeting your deadline for a response

Yours sincerely



J Stuart Black
Director

Delnieswood
Moss-side Drive
Nairn
IV12 5 PN
08/05/2009

Mr. D Polson

Area Planning and Building Standards Manager

Dear Mr. Polson,

Sandown Report to Committee ref 07/00188/outna

I have now read this report. Following our telephone conversation I believed that you were writing the report and that we had agreed there was a real anxiety about the developing "Democratic Deficit" around all the mistakes that the Development and Planning Department had made over the A 96 Framework shambles. This had led to a lack of trust in the planning process which is destroying any sensible way forward. In particular to quote your own words "the planners are guilty before they even open their mouths."

I was very surprised to see that you had not even written the report. The report does not cover much of what we discussed and in view of our discussion about the serious risks to the Council and individual Councillors as trustees of the Common Good Fund I must ask you through your good offices to ensure that Dr Stuart Black replies to the following questions in writing by 12 noon on Monday 11th of May. It is vital that the Head of the Department deals with issues of this magnitude and concern

The questions were put to Dr Black in my objection letters of 29/01/2009, 23/01/2008 and 12/08/2008. He should therefore find it easy to reply in this time scale.

- 1) Is Sandown Common Good land?
- 2) What is the Common Good for Nairn?
- 3) Does the money from Common Good Land sale remain in the Common Good for Nairn?
- 4) In the light of 3 what limitations has Highland Council put on the use of common good money received?
- 5) Was the 550 house number based on Halcrow agreement seeking to fund half the Nairn by pass from the developer?
- 6) If the existing Local Plan was for 140 houses and the Sandown Brief was for 199 how can it be in the Common Good to recommend 550?
- 7) Have the Councillors a conflict of interest in considering 550 houses?

- 8) Social Work in Highland has had very bad SWIA Reports. It struggles to provide services for existing elderly population. How will it cope with future demands?
- 9) What mechanism is in place to ensure a fair funding allocation for Health services in Nairn?
- 10) Nairn Academy /Rosebank/Millbank are all full or over capacity. Nairn Academy has had very poor HMI reports and a very poor building. The short term Head Teacher has helped and we would all like to see that continue. How can more pupils be accommodated and how can that help the quality of education?
- 11) How many Nairn children have recently been killed in fatal accidents on the "safe A96 route to schools?"
- 12) Was the wetland field to the south of the A96 included in the brief for housing?

In conclusion we discussed, and you confirmed that :

- a) If Highland Councillors voted to turn down the proposals from Deveron then Deveron could appeal.
- b) If Highland Councillors approve the proposals you assured me the proposals would have to be referred to the Scottish Government for the following reasons:
 1. It is contrary to the Local plan.
 2. There are long term unanswered questions about the way the Farming Land Tenancy /Ownership was handled.
 3. There is an insoluble conflict of interest for the Councillors as Trustees of the common good. The Sandown missives are dependent on the number of houses being given planning permission and this leaves them as Trustees very exposed to personal legal costs if they are found to be in breach of their duties as Trustees.

I would therefore ask that, as agreed Dr Stuart Black clearly spells out the procedure to be followed in writing by 12 noon on Monday 11th of May and that this letter and his replies are given to the planning committee on Monday as a start to restoring some credibility and trust in the planning process

Yours sincerely

Dr Alastair L Noble

Cc: Convenor A Park Clr L Fraser Clr E Macdonald Clr G Marsden
 A Dobbs M Morris S Black F Ewing M Scanlon
 D Alexander J Mackie R Youngson C Stafford I Bain

Delnieswood
Moss-side Drive
Nairn
IV12 5PN
29/01/2009

Dr Stuart Black
Director of Planning and Development
Barron House
88 High Street
Nairn
IV12 4 AU

Dear Stuart

Deveron Homes Sandown Application (21/01/2009) reference 07/00188/outna

I write to object to this latest application from Deveron.

I refer to my letter of objection dated 23/01/2008 and also to my objection to Cawdor's Proposal for Delnies dated 12/08/2008 (copies enclosed).

I am disappointed that you have not replied to my question to you in the letter of 12/08/2009. What process are we following?

Until there is clarity and agreement about any legal change in the process we can only assume the Local plan stands and is valid. These proposals are clearly contrary to the Local Plan and therefore invalid.

This is before we enter into the Common Good Legal Minefield with obvious conflicts of interest for the local councillors.

My two previous letters stand as objections and set out clearly the mess Highland Council are in. I recently attended a meeting in Nairn organised by The Prince's Foundation titled Nairn Enquiry by Design which helped to make the whole planning confusion worse. Nairn is seen as a lovely town about the optimum size for Community Planning to work and with its infrastructure creaking-roads grid locking, Nairn Academy staff, building and above all the pupils suffering, etc and we want to increase its problems to benefit who?

Scott Davidson from Halcrow clearly and repeatedly stated that the reason Deveron are bidding for 550 houses is that he told them he needed 550 x tariff as planning gain to pay for half his bypass. The developers and the Scottish Office Representative could not believe he was being as clear and dogmatic. The whole lack of objectivity in using outside management consultants was exposed as the farce it has been and the A 96 Corridor proposals seen as a sham and a massive conflict of interest for the Highland Council and exposing the Councillors and staff to real risk. Again I would urge the Council to abide by the local plan and stay within a clear legal framework.

In case it is so long since anybody looked at it I enclose a copy of the local plan for Sandown and a layout of what an attractive development could look like compared to the mess of the Deveron plan.

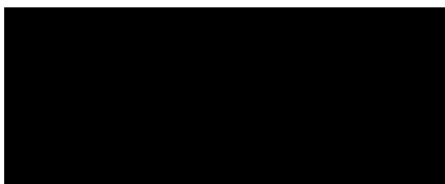
I also enclose a Nairn Suburban Community Council Discussion Paper from Dick Youngson dated November 2007 which could be seen as a sensible way forward for the common good and as perhaps a Nairn bid for Leader Funding.

I also attended an APT meeting on the Housing Land Audit and the last thing Highland needs is more land zoned for housing. We already have far too many houses. Those economies which have over developed housing USA, Ireland Spain and Cyprus are in massive trouble and we surely do not want to follow them down this crazy road. (Relevant copies attached)

The whole development bubble is over. The realistic forward population figures are attached and have been long available.

However we are moving onto my biggest concern and objection to these proposals. The current and projected financial recurrent revenue flows for both the Scottish Parliament and local authority are going to struggle to meet existing demand .Highland Council Social work is very stretched already. We have to carefully consider the way forward and if developers are going to provide planning gain then I think they will have to guarantee recurrent revenue to Health and Local Authority at a level which will make new housing prohibitively expensive .It is no longer enough to pay for a wee road or a sewer. The council has to balance the common good and show value for money. This development is wrong and should be rejected.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Alastair L Noble

Delnieswood
Moss-side Drive
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IV12 5PN

12/08/2008

Dr Stuart Black
Director of Planning and Development
The Highland Council
1-3 Church Street
Inverness
IV1 1DY

Dear Stuart

Cawdor Planning Application-ref08/00080/OUTNA-as advertised in Nairn-shire Telegraph of 15 /07/2008 with a closing date of 15/08/2008 and having read Cds from Developers.

Firstly I would like to be sure what procedure we are following. As you are only too well aware there has been a massive loss of trust in the whole debacle over the A 96 Proposals and nobody knows what process is being followed and even if it is legal. This has led to a significant Democratic Deficit and an amazing lack of trust on all sides. The A 96 Framework was rushed to "nowhere" at the end of the last Council with no clarity of procedure. The safest and most legal place to be is back to the Existing Local Plans and to take the process forward under The Local Plan Updates. Richard Hartland is on record as saying what a difficult position The Highland Council has been placed in.

One interpretation is that developers are rushing ahead on the assumption that the A 96 Framework has some status. This has raised in planning terms the nightmare scenario of Ribbon Development from Nairn to Inverness - surely failing even primary one planning training and guidelines.

If we are to restore public trust the process will need to be honest, transparent and clear. Again that would be best done in the updating of the Local Plans. The present level of discussion about "collusion" between Developers and Planners reminds me of Puff Puff Thomson/Cromarty Petroleum and The Golden Mile-episodes which did little to improve the professional reputation of Highland Council and its planners.

We know Highland Council is facing a very difficult demographic future and that will not improve for 30-40 years. The Financial outlook is dire and at one level we have to ask again what we are doing by attracting developers to build houses. Ireland, Spain and Cyprus are all looking at the disastrous outcome of that policy. Do we need to add to the 18000 houses in Highland classed as empty? Highland Council Social Work has recently had a very poor SWIA Report with evidence that it is struggling to cope with its existing elderly population. Recent decisions such as not paying the Deputy Chairman could be seen as supporting the view that Highland do not take nearly seriously enough

their important role with the Health Board in providing the massive increase in Community Care needed to meet The "Kerr Report". These issues will not go away and need to be urgently addressed. I doubt if we can afford to care for our existing future elderly population let alone the increasing numbers who might buy or move to these developer driven ribbon developments.

In my opinion we should be planning to cope with our existing population for the next century. We have to plan for the baby boomers over the next 30 years and as they die off the population structure becomes much more manageable. We are asking a relatively small number of young working people to fund both the pensions and the care of this bulge of elderly. It is not going to be easy or financially good. Any plans have to be based on this reality. The Scottish Population will go down and we should welcome this and show the rest of the world how to plan properly for a sustainable future. Again I can see no reason to let developers gain some questionable money at the expense of the public good. We will struggle to meet our necessary infrastructure costs for Care, Roads, Sewage, Environment, Waste etc on existing population let alone increase. Inverness is a planning shambles and it is hard to see what benefits a sprawl of Inverness suburbia to include Nairn could bring! I cannot see many tourists wanting to join the traffic jam or look at another housing development or supermarket.

The Cawdor Plans are firstly dependent on Deveron's plans for Sandown going ahead. Again Deveron's proposals are contrary to Local Plan and because The Land is Common Good the planning and legal process are far from clear. We should plan to sort out Sandown before even looking at Delnies proposals. It would be criminal in planning terms to stick a few houses in a field at Delnies.

The Sandown plans open up the whole debate on what is The Common Good? Surely the existing population must have a major say in this debate. A massive overdevelopment to benefit a developer cannot be seen as in the Common Good. To sell Common Good Land to the highest bidder against maximum number of houses seems contrary to natural justice and probably unwise if not illegal. It will be a long time before Sandown planning is clear. Recent proposals to mix in affordable houses seem daft. Why sell to a property developer and then buy back land for council housing? Why not just use Common Good Land for Council Houses? Why don't the Council just buy some of the many houses on the market in Nairn? Previous experiences of people being sent to Nairn by Albyn Housing for example were not good and my heart sinks when we hear of Nairn being used to soak up other cities' problems.

The Halcrow A 96 "master plan" for South Nairn just sums up the mess we are in. Highland Council appoint outside consultants to set criteria and clarify planning. The public go along and agree with the plan which best fulfils the criteria. Even the Local Provost (now Convenor Sandy Park) agrees this is the best plan and then surprise, surprise the Delnies Plan is put forward although it fails most of the criteria chosen by our outside consultants. Interestingly enough it is the plan which appeared in the glossy Tornagrain Charrette - no wonder there are doubts about "collusion". Having been unfortunate enough to have to endure the similar "glossy" presentations on Tornagrain, Delnies and Sandown I have heard all I want to hear about obscure English Villages and can't help wondering why we are not looking at new villages close to Darnaway and Cawdor rather than historic bad ribbon development along the A 96 and an airport!

The similarity in the 3 proposals is scary as is the PR slick technique of mentioning all the important issues and the complete lack of honesty in addressing these issues. Relatively small amounts of

money for roads or land are offered as planning gain completely missing the enormous costs to the Highland Council and Scottish Parliament for infrastructure and above all the recurrent costs in Health and Social Care. No development should be considered without a clear and properly funded study about current and future Capital and Recurrent Revenue Costs.

On recurrent revenue costs the Cawdor argument that they need to build 300 plus houses with the potential to build 1700 more to cross subsidise the tourist development strikes me as contrary to all sensible planning. If Cawdor is given planning they openly say they will sell land to developers and not build themselves. Who is guaranteeing what? For whom and for how long? The ongoing saga around Aviemore hotels, golf course and sprawling and ugly housing shows how hard it is to understand and believe "promises" given and even more important to enforce them. What is the planning basis for cost and cross subsidy and does it extend to Council and Health recurrent costs.

Do we need more golf courses? A fascinating article in Bunkered(Scotland's Golf Magazine Issue 81) questions all of this and locally there are fewer Americans and less visitors even before Castle Stuart opens .Aviemore is struggling and a bit like the housing market if we over provide all the courses are being put at risk. The same applies to Hotels and Conference Centres .Are we providing too many and putting them all at risk. How sustainable are all these tourist based developments with high fuel costs.

In the Latest RSPB Magazine –Simon Barnes sums up the difference between developers and conservationists "when a developer sees a stretch of open country, he sees a place that is empty. When we look at it, we see a place full of life."

I hope we will not destroy the beautiful stretch of Hilton and Delnies for short term greed and opportunism on the back of the misguided A96 "master plan" and that a sensible new Local Plan allows what little development that may be necessary to round off Nairn to the south and east.

There is no point in Planning if we do not have faith in its process and the price of getting it wrong for Nairn is just far too high. We all need to pool our different skills and be very sure of our facts and procedures before we destroy Nairn in the same way as Inverness has suffered from previous bad planners.

Yours sincerely

Dr Alastair Noble

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23/01/2008

ACTING DIRECTOR OF PLANNING
HIGHLAND COUNCIL
GLENURQUHART ROAD
INVERNESS
DEAR SIR

DEVERON HIGHLAND LTD
SANDOWN LANDS
07/00188/OUTNA

I AM WRITING TO OBJECT TO THIS PLANNING APPLICATION AS A GROSS DEPARTURE FROM THE LOCAL DEVELOPMENT PLAN.

1 I HAVE NOT RECEIVED ANY NOTIFICATION FROM THE DEVELOPER DESPITE BEING A NEIGHBOUR
2 I HAVE NOT RECEIVED A PLAN AS REQUESTED AT OPEN NIGHT (NOT STRICTLY PLANNING BUT HARDLY A GOOD SIGN)
3 THE LOCAL PLAN IS STILL IN PLACE AND WE ARE ABOUT TO CONSIDER THE NEXT LOCAL PLAN. WHY THEN ARE WE DEALING WITH THIS PLAN AT PRESENT?
WHAT STATUS DOES IT HAVE?
4 WE HAVE MOVED FROM AN ATTEMPT TO IMPROVE THE JOB PROVISION IN NAIRN TO HOW MANY HOUSES CAN WE SQUEEZE ONTO THE SITE ie MORE DORMITORY HOUSES FOR INVERNESS OR MORE ELDERLY PEOPLE MOVING IN
WE ALREADY HAVE OVER 1000 OVER 75 IN NAIRN BOTH THE HIGHEST NUMBER AND THE HIGHEST PERCENTAGE IN HIGHLAND.
WHAT PLANNING HAS BEEN DONE ON RECURRENT REVENUE COSTS FOR HEALTH AND SOCIAL WORK.
SHORT TERM GAINS FOR DEVELOPERS AND BUILDERS HAVE TO BE BALANCED AGAINST THE LONG TERM REVENUE COSTS
5 THIS IS COMMON GOOD LAND. ALL HIGHLAND COUNCILLORS ARE TRUSTEES OF THE COMMON GOOD FUND. WE NOW HAVE A SITUATION WHERE THE MORE HOUSES PLANNING IS GIVEN FOR THE MORE THE DEVELOPER WILL PAY THIS MUST BE A CONFLICT OF INTEREST AND IT HARD TO SEE IN PLANNING TERMS HOW THE COUNCIL CAN COPE WITH THIS INTELLECTUALLY AS WELL AS LEGALLY
6 THERE IS A LOCAL VIEW THAT THE WETLAND SOUTH OF A 96 SHOULD REMAIN AS COMMON GOOD LAND AND BE DEVELOPED BY A WETLAND TRUST.
HAS IT BEEN INCLUDED IN THE SALE OR NOT?
THE PLANS ARE A MESS. DO WE NEED AN URBAN CORE?
WHAT DOES IT MEAN?
8 THERE ARE ALL THESE MAJOR ISSUES TO BE ADDRESSED BEFORE WE START ONTO THE DETAIL WHICH IS GROSS OVER DEVELOPMENT OF THE SITE
9 NO PLANNER WOULD WANT TO SEE RIBBON DEVELOPMENT FROM NAIRN TO INVERNESS. THERE WAS A CLEAR LINE BEING HELD AT THE WEST OF NAIRN WITH THE DEVELOPMENTS TO GO SOUTH AND EAST. WHAT IS THE STATUS OF THAT PLAN?
IF HIGHLAND PLANNING IS IN A MESS AND MISTAKES HAVE BEEN MADE AND PROPOSALS CONTRARY TO GOOD PLANNING RUSHED THROUGH AT THE END OF THE LAST COUNCIL THEN THIS SURELY IS THE TIME TO USE THE OPPORTUNITY OF THE NEW LOCAL PLAN TO RE ESTABLISH CONTROL AND TRUST IN PLANNING PROCESS.
I AM HAPPY TO HELP THE PROCESS AND CAN CONTRIBUTE THROUGH MY UNDERSTANDING OF LOCALITY PLANNING, CHP AND THE COST CUBE LOOKING ESPECIALLY AT LONG TERM HEALTH , RESOURCE TRANSFER AND SOCIAL WORK COSTS.
I AM A FIRM BELIEVER IN GOOD PLANNING AND I THINK WE CAN SOLVE THIS ALL SENSIBLY IN THE SHORT TO MEDIUM TERM BUT IT IS A BIG BUT PLEASE DO NOT RESPOND TO ALL THESE PLANS WITHOUT AN OVERALL PLAN AND A CLEAR UNDERSTANDING OF ALL THE LONG TERM IMPLICATIONS
YOURS SINCERELY

DR ALASTAIR NOBLE