

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

Reference Number:	HWLDP-MIR-225
Organisation/Individual:	Kincraig & Vicinity Community Council (John Anderson)

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

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

<p>Approaches need to be consistently applied</p> <p>Measures needed to protect existing dwellings from flooding</p> <p>Development of a Park and Ride South of Inverness at Aviemore may be beneficial</p> <p>Need more evidence of benefits of woodland crofts</p> <p>Lack of funding for core paths may hold back retention of network</p>

Action Sheet Completed by:	SH
Date:	10/12/09

Dawn Sutherland

From: frances521 [REDACTED]
Sent: 09 November 2009 15:38
To: devplans
Cc: andrew brien
Subject: Kincaig CC contribution to Highland-wide LDP consultation

Good afternoon,

Please find attached our response to the above consultation, together with our thoughts on the earlier HC Housing Strategy consultation for reference in relation to Q 14.

We would appreciate acknowledgement of safe arrival.

Thank you for your attention.

Yours sincerely,

John Anderson, Secretary & Treasurer, Kincaig & Vicinity Community Council
Goldenacre, Dunachton Road, Kincaig, Kingussie, PH21 1QE
[REDACTED]

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Kincraig CC Response to Highland-wide Local Development Plan – Main Issues

(As B & S lie within the Cairngorms National Park boundary, we comment in that context.)

National Framework: No comment.

Vision for the Highlands: Accept.

Where should growth go: No comment.

Development of Local Centres:

Note Para 4, Page 29: 'The Cairngorms National Park Authority is responsible for the preparation of Local Development Plans in the National Park area. *Our (The Highland Council) Local Development Plan should complement and support the work of the Park Authority in delivering their aims, whilst ensuring that the services and infrastructure for which the Council is still responsible for (roads, schools, open spaces) are delivered effectively.*'

Wider countryside & fragile areas: Q11: Agree Preferred option.

Affordable housing: Q 14: Tend towards Preferred option.

Suggest desirable to have a consistent approach to the proportion of 'affordable' housing within a development across Highland, but the burden of one affordable for every three 'open market' builds has the unintentional consequence of elevating the average 'open market' price to a greater degree, thus widening the gap between the 'open market' sector and what is deemed to be 'affordable' for local people.

B&S covered by the CNP, but see attached earlier Kincraig response to HC 'Housing Strategy for the Highlands' consultation.

Planning for an ageing population: Q 15: Agree Preferred option.

Gypsies / Travellers: Q 16: Tend to agree Preferred option, but would expect a generally consistent approach to be taken.

Retailing: Q17: Agree preferred option.

Developer contributions: Q18: Agree Preferred option. But see relevant comment re Q 14 above.

Natural, built & cultural heritage: Tend to agree Preferred option, but with regard to biodiversity, suggest caution as Environmental Impact Assessments are often costly, time-consuming and frankly often 'over the top', so need to be commissioned 'case by case' on a realistic basis.

Previously used land: Q20: Agree Preferred option.

Wild land: Q21: Agree Preferred option.

Water environment: Q22: Agree Preferred option.

Renewable energy: Q23: Agree Preferred option – although electricity production will require increased capacity in the national grid network including consideration of under-sea options.

Flooding: Q 24: Agree Preferred option – but note that measures need to extend to protecting existing dwellings, structures, farm animals and indeed wild creatures unable to escape rising flood waters in areas such as those bordering the Spey. It is not satisfactory to say that the Insh Marshes can be used as a 'sacrificial area' to mitigate problems lower down the valley, when so doing will threaten vulnerable properties in the Kinncraig and up-stream localities (with no compensation being offered – if it were it would still be a poor second choice). Management of the Feshie confluence is key to controlling water levels from there to Newtonmore. Not clear what the soon-to-be-in-place Flooding Bill will require Local Authorities to do to protect property – including farming property (livestock as well as buildings), and domestic dwellings, but both must be taken care of. It is not just a question of 'only when human lives are at risk'. The flood warning arrangements also need to be sharpened.

Waste management: Q 25: Agree Preferred option – but need 'to think outside the box' on this one and communicate upwards to the sources of manufacture of much of the material that could be recycled if there were fewer variations to deal with. In addition to encouraging bio-degradable packaging, restricting manufacture of non bio-degradable packaging to three types of plastic for example, would simplify sorting and simultaneously increase volumes to more commercial quantities. Review what other LAs' are doing and learn from their experience.

Air quality: Q 26: Agree Preferred option.

Sustainable design: Q 27: Agree Preferred option.

Business & industrial land: Q 28: While this will largely fall to the CNPA to lead within the NP area, the HC will inevitably be closely involved in the provision of supporting infrastructure. With this proviso, we support the Preferred option.

Accessibility & transport: Q 28: Agree the Preferred option – good communication facilities are vital for further economic development – but must have regard to the scenic value which brings so many to the Highlands.

More passing opportunities required on the A9 and other similarly affected main roads.

Develop a 'Park & Ride' transport hub for the Strath in the Aviemore area in conjunction with the CNPA. To benefit from direct access to express bus services to the Central Belt, the facility would need to be located adjacent to the A9 to minimise delays to the express travel times. (The current M90 & M91 services take 3.5 hours to reach Edinburgh from Kinncraig – 7 hours 'there & back' on the same day is a long time to sit on a bus. Limited-stop services should cut these times to within reach of 2.5 and 5 hours respectively.)

Crofting & agriculture: Q 29: Agree Preferred option – but be aware that much of the 'arable' land in the Highlands will be of lower quality than Grades 1, 2 or 3.1 of the Macauley Institute classification, but should never-the-less be protected. Such land is clearly less productive than the higher grades, but has taken many years to create and provides much needed land for winter fodder production.

Subdivision of existing crofts: Q 30: Agree Preferred option.

Allocation of inbye land: Q 31: Agree Preferred option – ties in with above comment at Q 29.

New crofting townships: Q 32: Agree Preferred option.

Small scale new crofts: Q 33: Prefer your Stated alternative. We are far from convinced that there is much mileage in woodland crofts (minimum of 80% tree cover), and would prefer to see more land made available for traditional crofts, including land from the National Forest Estate currently restricted to woodland crofts. Better still if such land could be leased from the Forestry Commission instead of having to be bought by a Community body and sub-let to tenants.

Forestry & woodland: Q 35: Agree Preferred option in principle. Note however that the Scottish Government's target of 25% tree cover by 2050 (17% currently), will inevitably impact most on upland areas (including farming), as the hill areas offer lower productivity due to poor fertility and/or higher rainfall. 'Wall to wall' trees risk restriction or actual loss of vistas enjoyed by all unless planting is undertaken with due sensitivity to the problem. Eventual harvest will also create unsightly areas for years if clear fells are undertaken, so selective felling needs to be encouraged. Q 37 relates.

Difficult to defend the current practice of denying the development of sites designated as 'Ancient woodland' for housing when such land has been felled and replanted several times over the last two centuries (the whole country was under 'ancient woodland' if we go back far enough) – an unnecessary restriction which in some cases is resulting in the loss of valuable farm land.

Minerals: Q 36: Agree preferred option.

Open space & physical activity: Q 37: Agree Preferred option, but 'joined up thinking' needed here when considering the extension of tree cover deemed necessary in response to climate change.

Access to the outdoors: Q 38: Agree Preferred option, but must emphasise that the lack of statutory funding for the creation and upkeep of Core Paths will hold back retention let alone development of the network.

Kincraig & Vicinity Community Council

Response to HC 'Housing Strategy for the Highlands' consultation

Suggestions for consideration (with apologies for ignoring the set questions):

- 1.) **The principle need is for affordable housing for local people, so the strategy must be to focus on this and let the private (open market) sector look after itself.**
- 2.) Nevertheless, **planning** procedures affect both sectors and need to be speeded up and be more sympathetic to the needs of the situation we find ourselves in.
- 3.) *Nor should building occur on the limited areas of arable farm land* – we will need this for food production in due course, given current population trends.

So, concentrating on the need for 'affordable' housing for local people:

- 4.) **What is affordable?** We need to remember that there are various degrees of '*affordability*' depending on whether one is on a *minimum wage* (or less – income support), to those earning a bit more but insufficient to make the next layer up who have sufficient capital to lay down a deposit to enable them to start on the property-owning ladder through the various *assisted purchase schemes* such as RHOG or LIFT. *The Strategy for (affordable) housing must react accordingly.*

(It has however been suggested that schemes to provide 'social housing' for the lower paid simply add to the problem, particularly where workers come in from outwith our local area to work for the minimum wage and who then have to be housed at our expense in addition to our own low paid or 'out of work' people. Be this as it may, we have a problem housing genuinely 'local' people which we need to tackle as best we can within the resources available to do so.)

- 5.) **What to build?** Be guided by the knowledge of demand for housing needs indicated by applicants on the Housing Register, augmented by information from Housing Associations.
- 6.) Place '*Right to buy*' – *of existing Council housing stock – on hold* until current shortfall in social housing is resolved (done?).

Note however that a 'Right to buy' must not be applied to social housing provided by property owners in the private sector, otherwise nothing will get offered or built.

- 7.) Continue to seek '*write off*' of *Council housing debt* (had tenants voted for a move to Housing Association status, this would have occurred), thus freeing up money for improvements and/or contributing to new builds.

8.) All new builds will be to current national *building standards*. Those within the Cairngorms National Park are required to exceed these standards by at least 15%, but occupiers should see reduced fuel bills as a consequence. Higher standards to a degree imply greater cost but this should be contained by good design from the beginning. Give encouragement to the installation of *renewable energy sources* which would reduce heating bills still further. Such investments obviously come at a cost to the developer (which implies a higher rent), but the real test to the tenant is one of '*rent plus heating cost*' and not just rent on its own.

- 9.) All new builds will include *facilities for those with special needs* such as wheel chair access ramps, wide doors etc., so the main elements will be already be built into (or be relatively easily added) to an increasing proportion of the housing stock as time passes. In the

short term, an audit of the current housing stock should identify appropriate properties which could be most cost-effectively modified as required.

10.) Given that the demand for housing is seen to be outstripping the build capability, **identify below-standard properties for rent within the private sector**, and pressure Government to provide fiscal and /or other support **to encourage the upgrading of appropriate premises**.

11.) Consider improved **assistance to land owners prepared to provide 'affordable' housing for rent, but recognising that for this to happen, there has to be something it for them**. This is likely to require **retention of the freehold** (but which in cash flow terms, reduces the cost of new builds). Construction costs could be grant-aided on a similar basis to housing provided for rent by registered social landlords (*remember, we are endeavouring to solve a national problem so solutions may well lie in thinking 'outside the box'*). **Retaining a right to control who gets a tenancy** would also be very important in getting landowners on side, as in many instances, such houses would be targeted at retiring estate workers who express a wish to continue to live in the countryside rather than move to a village or semi sub-urban environment. The properties would however require to be **retained within the affordable sector** where grants had been received for their build. However if circumstances changed and the owner wished to take the properties back into the 'open market' sector at some point, the grants could be paid back on a sliding scale over say 20 years. Clearly this is a complex area which also includes taxation considerations (uncertain future here – possible changes in the pipeline, and also a 'reserved' matter) – but we are trying to *'think outside the box'*.

12.) **Houses for assisted purchase** give an opportunity for 'middle income' workers to become home owners in time. **Retention within the affordable sector** on transfer to new occupiers can be effected by placing suitable 'burdens' on the purchasers to retain the properties within the affordable sector (effective sale-back to the underlying Housing Trust or Association at a pre-determined percentage of open-market value), or similar.

13.) Give thought to building **new small 'Council' house settlements of 10-15 houses for rent on land released from say the National Forest Estate at low or better still zero cost**, provided the sites are situated within reasonable reach of bus routes and other services. Council-owned 'brown field' or similar sites may also offer potential.

14.) And finally, consideration be given to ensuring that all new 'affordable' housing projects (including social housing provided by Associations), carry full **'adopted' status** such that snow clearance, amenity grass cutting, etc. will be undertaken by the HC at minimum cost, *remembering that social housing for rent (HC and/or Housing Association), is catering for the least well off* (there should be no 'hidden extras' to be met by tenants over and above their rent).