

HWLDP-MIR-68

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

Save Our Dava
Greengates
Grantown-on-Spey
Highland
PH26 3PR

Planning & Development Service Dept
Highland Regional Council,
Regional Headquarters
Glenurquhart Rd.
Inverness

Dear sirs

5th. November 2009

Public consultation response - Main Issues Report, Highland-wide Local Development Plan

Our group wish to place formal representation for consideration on three allied issues within the above document : a) Natural, Built and Cultural Heritage, b) Wild Land, and c) Renewable Energy.

Before detailing our response to these issues, we wish to comment on the presentation format chosen for the Main Issues Report.

In critical terms, we regard the format of this document, which initiates the democratic process for fundamentally important H.R.C. policy review for the next twenty years, to be facile and vague in its presentation and layout. The gravity of the objectives that are set out in the document's Section 1 appraisal deserve a higher standard of layout and cross-reference than that which has been presented. Many of the accompanying figures, by the glib approach to their 'artistry', could just as appropriately have incorporated a smiling Bugs Bunny, with arms outstretched, displaying their content. No contents summary is itemised, and no figure numbering for easing public feedback reference to the Council exists, rendering appraisal of the document difficult. Inconsistencies are rife - some of the figures carry great detail, such as those detailing the A96 corridor development plans, plus the East Inverness Framework Plan. Others are simply not fit for purpose - the figure accompanying the Strategy for Marine Renewables on page 51, for instance, looks as if it was scrawled on the back of a cigarette packet five minutes before publication. Whilst it is appreciated that the format has to maintain interest and be informative to all readers, the correct balance has definitely not been struck. Without doubt, appropriate public feedback for this important initiative has been compromised by the superficial approach adopted - receipt of valid response is only relative to the quality of its informing input.

Nevertheless, we wish to address specifically your invited questions 21 (Wild Land), 19, (Natural, Built and Cultural Heritage), and 23, (Renewable Energy) in that order.

The perception of 'wildness' of land is subjective. Your introductory paragraph to 'Wild Land' should have highlighted that Highland Region carries by far the largest area which qualifies for this description in Great Britain. We suggest that a further alternative to the 'preferred options' listed would be for the Council to formally acknowledge that a far larger area than that which is informed objectively by S.N.H. as being geographically 'wild' is present in Highland Region, and must be recognised by H.R.C. as so, if weight of public opinion determines it as such. Too many planning development proposals, mainly onshore windfarms, are currently being considered in areas which are sensitive to this issue, but do not qualify to the strict and limiting range of strategic qualification criteria set down by Government Agencies. As such, they are incorrectly classified when entering the planning process.

Significant/

contd

Significant natural and cultural heritage interests occur outwith formally designated areas, as acknowledged in your alternatives to preferred options relating to this issue in the document. The planning process in Scotland, however, as currently viewed by Government consultee agencies, does not take due account of intangible qualities that certain areas may possess. These are usually identified by the high level of public objection response to major development proposals within or adjacent to them. It is the role of Highland Regional Council singularly to reflect within the planning determination process the level of public opinion regarding these intangible qualities, and ensure that they are afforded the fullest formal consideration in Council decision-making for the future. Dava Moor is such an area, proven by its on-going high profile at Holyrood and in news media.

With regard to renewable energy policy in Highland region, our group is disappointed that Highland Council chose in its ancillary figure diagram illustrating areas protected against windfarm development to merely duplicate the diagram illustrating designated areas as shown in the natural heritage section preceding. It is queried why, in the 'Forestry and Woodland' section following, the detailed diagram showing preferred and non-preferred forestry locations extracted from the current woodlands strategy document are shown, but the equivalent diagram detailing preferential and non-preferential windfarm location from the current Renewable Energy Strategy document is, for whatever reason, excluded from the Main Issues Report on renewables.

As such, the bullet points detailing locational issues in the 'preferred options' list cannot be commented upon, and are therefore presented unfit for purpose.

Our group's view as an alternative option is that onshore windfarm development within Highland region should be limited to its present approved extent, and resources transferred instead to promote offshore developments, especially the earliest advancement of marine tidal technologies into real projects. Scotland is a small country - highly intrusive industrial windfarms proliferating across its most scenic Region obviously clash with tourism, outdoor recreation, cultural and other heritage interests in a manner that cannot sustain efficient, overall stewardship of the Region by its Council's administrators - the policy integration required of an approved Structure Plan would be in disarray, and its cohesive objectives undermined.

Logically, onshore windfarm locations should be targeted towards less visually sensitive areas that are closer to the bulk of energy requirement users. This policy course would also obviate the necessity to cover the region and its scenically designated areas with the planned massive upgrade of electricity pylon lines, further compromising the Region's greatest asset, its landscape.

Yours faithfully,

Jeannie Munro co-ordinator, Save Our Dava.

November 30 Oct.

① Why opening up DAWK
For Wans Farm Dev.

When recommended not
to plant trees

Presumptive against
Development area.

Needs further protection
greatest asset AACU.

② Document is vague.
& unreasonable because
of how Q's are asked
& hence

Mrs.

Woodside -

6 copies
of Q

Dawa

Archer on Spin + 2-3

PH26 3PU reports

+ 1 copy

Power compensation