

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

Reference Number:	HWLDP-MIR-260
Organisation/Individual:	Colliers CRE – Whiteness Property Company

Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (<i>Please Specify</i>)	

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	x
Inverness and A96	
The A96 Corridor	x
Phasing of Development	x
Developer Contributions	x
East Inverness	
Nairn	
Tornagrain	
Smaller Settlements in A96	x
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	x
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	x
Developer Contributions	
Natural, Built and Cultural Heritage	

Previously used Land	x
Wild Land	
Water Environment	
Renewable Energy	
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	x
Accessibility and Transport	x
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	x
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
-------------------	-------------------------	-----------------------	---------------------

Notes:

<p>Unlikely scales and growth could be accommodated in other areas of Highland Considers contributions protocol will address issue of Infrastructure funding Proposed plan should encourage development to move forward in a phased and planned manner Development of A96 corridor will not be at expense of other development in other locations Explains anticipated phasing of development at Whiteness Additional capacity could be provided at Whiteness Sets out list of what they would like to see in proposed plan</p>

Action Sheet Completed by:	SH
Date:	14/12/09

Dawn Sutherland

From: Simon Hindson on behalf of devplans
Sent: 06 November 2009 15:47
To: Dawn Sutherland
Subject: FW: Consultation on Main Issues Report: Submission on behalf of Whiteness Property Company Ltd

Simon Hindson
Graduate Planner

Planning and Development Services
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

Telephone [REDACTED]

Keep up to date with the progress on the Highland wide Local Development Plan - <http://hwldp.blogspot.com>

-----Original Message-----

From: Aitken Anthony [mailto:[REDACTED]]
Sent: 06 November 2009 15:33
To: devplans
Subject: Consultation on Main Issues Report: Submission on behalf of Whiteness Property Company Ltd

Dear Sir/Madam

Please find attached a submission by Whiteness Property Company Ltd, in response to the Highland Wide Local Development Plan, Main Issues Report. WPC interest is in the A96 Corridor and their landholdings at Whiteness. Their response is focussed on the main issues relevant to these matters. Please can you acknowledge safe receipt of this submission.

Yours faithfully

Anthony Aitken
Director - Planning

Colliers CRE
39 George Street, Edinburgh EH2 2HN

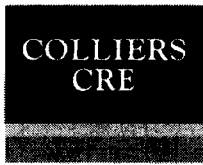
Web: www.collierscre.com

Colliers CRE is an independently owned and operated business and member firm of Colliers International Property Consultants, an affiliation with more than 290 offices in 61 countries worldwide. Colliers CRE plc registered in England & Wales no. 4195561 Registered office: 9 Marylebone Lane, London, W1U 1HL

Confidentiality Notice: This communication and the information it contains: (a) is intended for the person(s) or Organisation(s) named above and for no other persons or organisations and, (b) may be confidential, legally privileged and protected by law. Unauthorised use, copying or disclosure of any of it may be unlawful. If you receive this communication in error, please notify us immediately, destroy any copies and delete it from your computer system

This e-mail has been scanned for all viruses by Star. The service is powered by MessageLabs. For more information on a proactive anti-virus service working around the clock, around the globe, visit: <http://www.star.net.uk>

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



Town & Country Planning Acts

**The Whiteness Property Company Ltd
Whiteness, by Ardersier, Inverness-shire**

**Main Issues Report Consultation Submission
Highland-Wide Local Development Plan**



COLLIERS CRE

8th November 2009

Town & Country Planning Acts

The Whiteness Property Company Ltd Whiteness, by Ardersier, Inverness-shire

Main Issues Report Consultation Submission Highland-Wide Local Development Plan September 2009

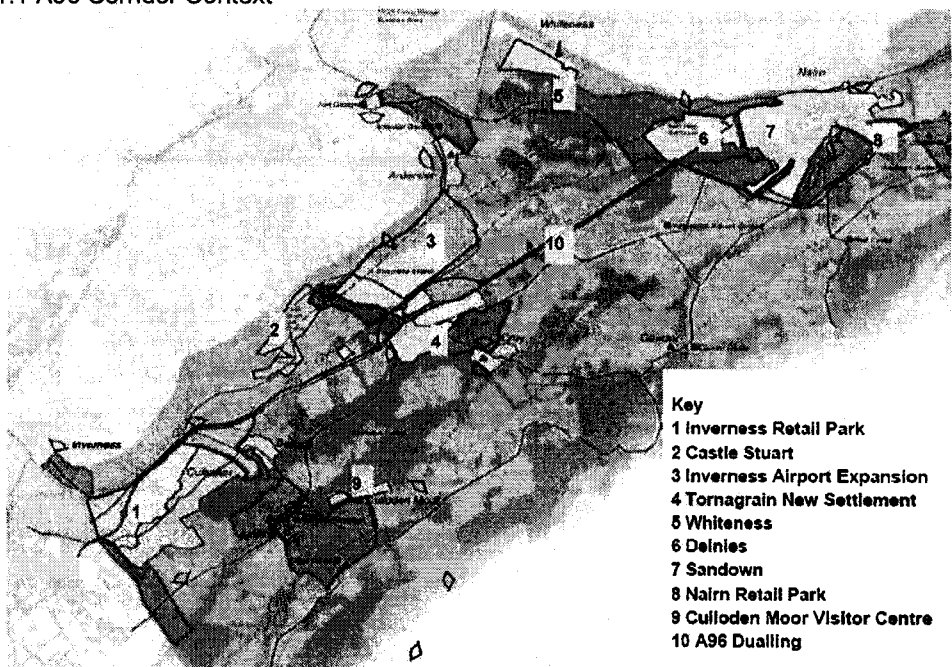
1.0 Overview

- 1.1 The Whiteness Property Company (WPC) has substantial landholdings at the former Ardersier Fabrication Yard just off the main arterial route between Inverness and Aberdeen, the A96. These landholdings cover an entire site area extending to 288.75 Ha (714 acres). The land benefits from outline planning permission, conditionally granted by Highland Council in November 2007 for residential and commercial development including housing, marina, boat yard, yacht club, visitors centre, nature conservation zones and hotel with supporting community facilities and sewerage treatment plant. A legal agreement, under section 75 of the Act, was also signed between WPC and Highland Council.
- 1.2 Since the conditional granting of outline planning permission in 2007, The Whiteness Property Company has embarked on a substantial programme of site clearance, remediation and improvement works, in line with conditions attached to the outline planning permission approved by Highland Council. Additionally, works to install infrastructure services to a substantive capacity has been progressed. In terms of protecting and enhancing the natural environment of the locale, the owners have also made considerable progress with agreeing management plans with the Highland Council for the marine environment and the recreational access opportunity. All of these important aspects are facilitating the future regeneration of the Ardersier site. They demonstrate real progress of the landowners, via substantial investment to deliver an exciting future for the Whiteness site.
- 1.3 A plan is attached which details the extensive landholdings of Whiteness Property Company (See Appendix 1) and its location in the context of the A96 development zone is shown at Figure 1.1, which is an excerpt from a Halcrow report for Highland Council.

- 1.4 The A96 road corridor serving Inverness East to Nairn (including Whiteness) has considerable potential to accommodate and deliver the projected growth needs of the Highland Council area. This aspiration of the Highland Council, and of Whiteness Property Company, has been well-documented since around the same time as the Whiteness planning consent in 2007. The A96 Growth Corridor Development Framework approved and adopted by Highland Council in 2008, makes a strong feature of Whiteness and its strategic potential to deliver a mix of development uses, over a long term, to meet the projected growth requirements of this part of the Highlands.
- 1.5 As Whiteness Property Company's planning consultants and professional property advisors, Colliers CRE has been working closely with our clients and seeking to engage with relevant parties since the middle of 2008 with a view to progressing further proposals for Whiteness, in order to capture and maximise the potential it offers – both in a land use planning sense and a commercial real estate delivery perspective. As such the landowner has been participating in a number of consultations, discussions and meetings with Highland Council and its partners, and has offered constructive comment on a range of other strategic development proposals coming forward in the vicinity. It therefore welcomes this opportunity to comment and contribute ideas about the issues and options to the Highland Wide Local Development Plan, in recognition of the fact that this stage is critical in terms of participation of interested parties.
- 1.6 The Whiteness Property Company is now keen to outline its views on the Main Issues Report (MIR), as published, that will inform the forthcoming Local Development Plan, and as substantial landowners they wish to ensure that a range of future planning uses can be considered for their landholdings to bring forward future employment, residential and leisure opportunities for the Inner Moray Firth area. These will be outlined in this submission. Whiteness Property Company also wish to comment on the key issues and questions presented by Highland Council in the consultation paper. Comments will be provided on the relevant sections of the MIR and questions raised that are of relevance to Whiteness Property Company and its landholdings.

1.7 Overall, the landholdings benefit from ease of access from the main arterial route between Nairn and Inverness, the A96. The site is 4 miles from Nairn, 6 miles from Inverness Airport and 8 miles from Inverness itself. This offers a key location feature of the site and is unrivalled as a future development opportunity given its extensive brownfield redevelopment condition, vast expanse of flat remediated developable land and an exceptional setting, overlooking the Moray Firth.

Figure 1.1 A96 Corridor Context



2.0 Main Issues Report – The Vision for the Highlands

- 2.1 Whiteness Property Company takes comfort from the introductory Section 1 of the Main Issues Report (MIR), where Highland Council advise that a series of choices are outlined in policy and landuse terms and that views on these are sought from interested parties. Whiteness Property Company would wish that their responses contained in this submission, are taken into account and inform the compilation of the Local Development Plan in early 2010. The Council has also identified at Section 2 the strength of support offered by the National Planning Framework 2 and its influence on the future for the Highlands. The potential role of the A96 Corridor and strategic transport routes including the A96 are noted.
- 2.2 In Section 3 of the MIR, questions are raised about the suitability of the overall vision for the Highlands. WPC considers the suggested vision is suitable, as it puts the long term needs of the wider Highland area into a series of policy contexts – as opposed to looking to shorter term prospects. WPC agrees with this ambition. Equally the policy contexts covering the Single Outcome Agreement for the Highlands fit well within the Local Development Plans long-timeframe and are believed to be achievable and measurable – that is to say, they offer a degree of flexibility according to future prospects but provide a clear steer and direction as to future investment and growth for the Highlands.
- 2.3 WPC is particularly interested in where future growth should go in the Highlands and how it can be delivered. WPC are keen to highlight that their landholdings can fulfil an important role in meeting the Highland Council's vision. This is consistent with the information provided by WPC, via Colliers CRE, to Highland Council, in April 2009, where it was outlined that the development could double in size (from 1950 to 4000 housing units) and still provide an internationally high quality residential / resort development. Section 4 of the MIR specifically examines the prospects for the A96 Corridor. The next Section of this submission provides a full discussion and commentary on this matter from WPC.
- 2.4 WPC is also interested in broader policy options for land uses appropriate to its landholdings including its ideas about affordable housing, providing for the ageing population, delivering infrastructure, offering employment, retail provision and wider regeneration options. The following Section of this submission provides ideas for consideration by Highland Council relative to the WPC landholdings.

3.0 **The Spatial Strategy**

3.1 In Section 4 of the Main Issues Report, the focus of accommodating new growth projected for the Highlands in terms of Spatial Strategy appears to be firmly focused on the A96 Corridor, despite the need to deliver from within existing centres of population such as Inverness city itself. WPC supports the A96 Corridor option as the considerable amount of development work invested in testing the spatial concepts should not simply be disregarded and the intent fits with the broad vision looking 30 years ahead and not just the first five years of the Proposed Plan's life. Also it is unlikely that the scale and extent of growth projected could be accommodated elsewhere in the Highlands, were the key factors of accessibility, land availability and capacity of the natural environment found to be not suitable or indeed available.

The A96 Corridor

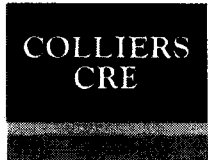
3.2 The Main Issues Report sets out the following preferred option for development coming forward in the A96 Corridor:

- Identification of Individual sites within the Proposed Plan;
- Support early (2011-2016) phasing of development, before but subject to commitments in principle from the development industry and agencies like Transport Scotland and Scottish Water to ensure that all types of infrastructure are in place when they are needed.
- Identification of the amount of development allowed in years 2011 – 2016 and 2016 – 2021 development planning periods across the corridor; and
- Link the phasing of development to the outcomes of work on existing sites in Inverness.

3.3 The MIR proposes two other options:

- To constrain development in the A96 Corridor until infrastructure requirements such as the dualling of the A96 are complete; or
- To refocus the area which could accommodate development to include Inverness-shire and Easter Ross, i.e. the rest of the Inner Moray Firth Area.

- 3.4 In response to the two options above, firstly, WPC believes the delivery of the infrastructure improvements in the A96 Corridor would not have to be complete in order for the development of identified sites to come forward. Rather WPC considers the infrastructure improvements will be required to be delivered on a phased basis commensurate with development and, in line with the economic and population growth of the A96 Corridor area. Constraining the implementation of identified sites, particularly those which have outline planning permission such as Whiteness, could jeopardise the realisation of the infrastructure improvements sought.
- 3.5 The A96 Corridor Development Framework, which Highland Council has given the status of Supplementary Planning Guidance, seeks to ensure that contributions from developments coincide with development milestones in order to meet expanding infrastructure requirements. Whiteness Property Company considers that this mechanism will adequately address the issue of increasing infrastructure requirements and that constraining development in the area will have the effect of delaying these improvements until latter dates..
- 3.6 WPC considers the uncertainty arising from the Strategic Transport Projects Review further underlines the need to progress development and infrastructure work in tandem, as timescales for completion of the A96 dualling, A96/A9 link and the Nairn Bypass are presently unknown. Given the recently announced Scottish Government budget for 2010-11, in which national transport infrastructure projects were earmarked for cancellation, it would be unwise to add further uncertainty to delivery timescales for improvements in the area. The Council through the Proposed Plan should send an unequivocal message encouraging development proposals to come forward in a phased and planned manner and in so doing, assist the delivery of common infrastructure across the A96 Corridor. The Whiteness development is committed, with outline planning permission and should be one of the early development proposals, capable of delivery in the short term.
- 3.7 Turning to WPCs response to the second option detailed above, regarding widening the spatial area that could accommodate future development identified for the A96 Corridor. WPC considers that exercising this option would delay development coming forward, as the capacity of these new areas to absorb the scale of development required is presently unknown and represent an abandonment of the time and resources employed, both by the Highland Council and by other stakeholders, in progressing the A96 Development Framework this far.



- 3.8 Whiteness Property Company recognises that the regeneration of the region's northern areas which are experiencing economic stagnation is important (such as around the Cromarty Firth); however, it cannot be ignored that Inverness and the Inner Moray Firth Area will remain the primary focus of inward investment to the Highland Area. This fact is acknowledged in the Housing Need and Demand Assessment Consultation Draft (HNDA) published by Highland Council in August 2009 (Paragraph 8.7). This is due to the strategic location of the area and its infrastructure links to the rest of the country.
- 3.9 The Housing Need and Demand Assessment Consultation Draft (HNDA) (drawing on information from the Highlands Single Outcome Agreement among other sources), which is intended to inform the amount of housing development land allocated by the new local development plan, identifies that economic growth in the Highland area has historically been concentrated on the Inner Moray Firth area and expects that this will continue to be the case.
- 3.10 By way of illustration, the HNDA shows the following assessment of need (in housing units) in Inverness, Nairn and Easter Ross (the latter area into which it is proposed to expand the search):

Housing Market Area	Need (housing units)			Total
	2010 – 2014	2015 - 2019	2020 - 2029	
Inverness	4726	4730	6664	16120
Nairn	814	817	938	2569
East Ross	1118	1062	1206	3386

(Source: HNDA, Table D9: Housing Land Requirement to be used in Local Plans)

- 3.11 It is clear from these figures that Inverness and Nairn (together incorporating the A96 Corridor development area) have a high level of housing need. Indeed, the HNDA identifies that Inverness and Nairn are expected to experience the highest (21.4% and 21.7% respectively) net upward change in the number of households between 2006 and 2021 of all the Housing Market Areas in Highland (Source: HNDA Table F6).

- 3.12 While the total projected requirement for Inverness and Nairn combined amounts to 18,689 housing units between 2010 and 2029, the A96 Development Framework identifies sites for 11,895 housing units between 2006 and 2031. It is clear that maintaining the focus of development on the A96 Corridor, which is most appropriately located to satisfy growth, will not be at the expense of an appropriate level of development in other locations. WPC believe, there is scope for a larger percentage of this development, to be captured in the A96 Corridor and to assist in the delivery of infrastructure required, their site can assist in accommodating this growth, doubling the units numbers from the current 1950 to 4000..
- 3.13 WPC concludes therefore that the A96 Corridor remains the most appropriate option for accommodating the identified economic and residential growth. Whiteness, as a location can assist in the delivery of the preferred spatial strategy.

Phasing Issues Within the A96 Corridor

- 3.14 At the A96 Growth Corridor Delivery Forum, held in June 2009, there was a full and frank discussion regarding phased development. Each major developer was represented and it was widely agreed that the current phasing contained in the A96 Development Framework required to be updated. In this regard WPC were party to these discussions and agreed that an update was required. As detailed in the note of this meeting provided by the Council's consultants, Halcrow, an agreed land supply position was reached. In this regard WPC believe that the delivery of the first phase of their development, comprising 400 units or thereabouts in the period from 2011-16 is realistic and achievable, over the plan period. Whiteness will be an effective housing site, allowing for the early delivery of built development. In this regard it should be noted that the decontamination and remediation of the site has been completed to the satisfaction of Highland Council.
- 3.15 In terms of the second phase of development from 2016-2021, it is considered that with the development fully underway that 600 units can be provided within this period, which will represent a 50% increase on the initial first phase of development.

Developer Contributions in the A96 Corridor

- 3.16 It is considered that there should be phased developers contributions commensurate with the infrastructure required and its timing for delivery. On the basis of the initial Developers Protocol for the A96 Corridor, WPC are supportive of this approach to the entire A96 development area through the new Proposed Plan, all developers should be signed up to its terms, as these allow for an equitable distribution of infrastructure cost. In addition, WPC believe that there remains the requirement for relevant Government bodies and statutory consultee's to devote time and resource to detailing an agreeable programme of phased and appropriate infrastructure requirements, in conjunction with the developers who will be funding the upgraded infrastructure. This should also be reflected in their individual investment plans to represent 'joined up thinking' on behalf of all stakeholders. There will also be a requirement for the agreed Developers Protocol to be evenly and consistently applied to all identified development and any other development proposals that arise during the lifetime of the Proposed Plan.
- 3.17 Indeed, to underline the support of WPC, it considered that an appropriate point when the Developers Protocol is agreed between all relevant parties, that the current section 75 legal agreement for Whiteness, should be amended between WPC and Highland Council to reflect the agreed terms of the Developers Protocol, as this would represent the up to date and appropriate level of agreed developers contribution, which will replace the terms detailed in the current section 75.
- 3.18 There is no support from WPC for an alternative case by case approach as this would lead to an inconsistent level of developers contribution from different developers and would not allow for the 'step change' level of infrastructure improvement required to benefit the entire A96 Corridor over the Proposed Plan period.

Area Specific Issues

- 3.19 The MIR does not specifically identify Whiteness or the former Ardiersier fabrication yard as an 'Area Specific Issue' and WPC consider that the MIR lacks balance in terms of discussing the specific issues relevant to other A96 Corridor locations including East Inverness, Nairn and Tornagrain. Whilst it is acknowledged by virtue of its planning consent, Whiteness has already established principles about land use and development, this should not preclude the location from equal weight in terms of the issues and options to be discussed within 'Area Specific Issues'. Indeed, the subject of the future growth potential of Whiteness, should in its own right ensure that it merits inclusion in the Proposed Plan as an 'Area Specific Issue'. WPC would wish that this matter is rectified in the published Proposed Plan.
- 3.20 WPC believes Whiteness possesses 'Area Specific Issues' worthy of consideration and wider debate. These include the capacity of Whiteness to provide further housing, leisure, commercial and employment land use development and the site's critical role in the wider A96 Corridor delivery – should any 'additionality' be realised from the site.
- 3.21 **Whiteness itself is ideally placed to contribute additional housing units to meet the projected shortfall; 2,000 additional homes could be provided on the available land at Whiteness.** This would mean that an additional 4,794 units, essentially 5,000 homes would be required through other development sites throughout the Inverness and Nairn area in the 2010 to 2029 period. This is depicted in the Table below which takes the HNDA, Table D9: Housing Land Requirement to be used in Local Plans and the A96 Development Framework Sites. This indicates the shortfall requiring the identification of additional housing sites.

Inverness and Nairn Housing Land Requirement, 2010 to 2029

2010 – 2029 Need	A96 Development Framework Sites	Shortfall	Additional Whiteness Capacity	Shortfall to be Provided by Other Sites
18,689	11,895	6794	2,000	4794

- 3.22 Whiteness Property Company agree that satisfying the housing need in other areas is important, although this should be commensurate with the scale of the settlement and the overall spatial strategy. On this basis and as detailed above, Whiteness can accommodate further growth whilst allowing for proportional development to be accommodated elsewhere. Whiteness also benefits from infrastructure and utility provision for accommodating up to 4,000 properties, being in place at present, development can therefore commence in the short term with infrastructure capacity available for the larger number of units sought. Therefore, we consider the Highland Council's preferred option to continue their commitment to the A96 Corridor Development Framework the appropriate course of action and Whiteness can assist in the delivery of further housing provision over the longer period, as detailed above.
- 3.23 Further clarification of the quantity of development within the A96 Corridor would be expected to follow the update to the A96 Corridor Development Framework document, along with any alterations required in light of the HNDA which was published in August 2009. This would create certainty for local communities and sources of inward investment alike over the plan period and beyond.

Smaller Settlements in the A96 Corridor

- 3.24 It is considered that the smaller settlements should be allowed smaller scale development and growth commensurate with their size. Future growth should allow for natural extension and should respect the existing settlement patterns, to ensure that the existing character of each of these settlements is retained. Therefore WPC agree with the Council's preferred strategy on this matter.

Housing Land Requirements and Whiteness Land Supply

- 3.25 By extending the above 'Specific Area Issues', WPC is therefore interested in discussing the important Housing Land requirements and needs of Highland Council in this context. The following sections present WPC's views on how its landholding can further assist Highland Council in meeting the projected housing land requirement through the Proposed Plan and beyond into the 30 year visionary timeframe.

- 3.26 The HNDA indicates that the population of Highland Council Area will increase by between 4% and 16% depending on which of three growth scenarios unfolds. If the rate of population growth continues as at present (central projection), Inverness and Nairn (as noted above) will experience the highest (21.4% and 21.7% respectively) net change in the number of households between 2006 and 2021 of all the Housing Market Areas in Highland (Source: HNDA Table F6). The HNDA states at 14.1 that Highland Council "*proposes to use the high migration scenario as the basis for planning*"; under the high migration scenario, the net change would be even greater. WPC support this strategy and their site can comfortably accommodate additional units to assist the Council in realising their aim via the high migration scenario.
- 3.27 In answer to Q12 of the MIR, WPC do not agree with the option that housing land policies should be based upon a lower level of need; even at central projection levels, the rate of population growth will ensure that Inverness requires a further 13,742 houses, with Nairn requiring 2,127, in the period 2010 to 2029 (Tables D5-D7 inclusive), totalling 15,869 units. This would still show a shortfall in effective housing land supply; even with the A96 Development Framework sites' contribution of 11,985 units, this would mean a shortfall of 3,884 housing units at the central projection levels.
- 3.28 Basing housing land supply on lower levels of need could result in a greater shortage of housing land in the longer term; while the housing market is currently experiencing a downturn, due to access to funding as opposed to lower demand, there is still an underlying need which will require to be satisfied once conditions are such that entry into the market becomes possible. If insufficient land is allocated for future requirements the forces of supply and demand will ensure that scarcity drives prices upwards and the ability to enter the market will be compromised, adding to problems of affordability in the housing market.
- 3.29 PAN 38: Housing Land states at Section 9 that a 20-year time horizon should be considered by planning authorities with regard to satisfying housing land requirements. Furthermore, it states that "*authorities will require to demonstrate that the development plan provides at least a 7-year supply of land which is effective or agreed through the housing land audit process as likely to become effective in time to meet plan requirements.*" Whiteness Property Company considers that the Proposed Plan should adhere to this guidance, which is in line with Scottish Planning Policy, and address the long term housing land requirements specifically.

- 3.30 The Main Issues report states that the preferred option of Highland Council is to *“adopt a positive approach to the delivery of effective housing land”*. As noted above, the identified need for 18,689 housing units in Inverness and Nairn between 2010 and 2029 can be met to a certain extent by development sites within the A96 Corridor, including Whiteness, which benefits from Outline Planning Permission for 1,950 units, and existing allocated sites within Inverness itself. The shortfall in the Inverness and Nairn area, as identified in the Main Issues Report, could be accommodated in part by the expansion of existing sites, such as Whiteness. As discussed above, the site can offer a further 2,000 units without undermining the ability of other sites to meet the remaining shortfall.
- 3.31 WPC notes that the Effective Land Supply identified in relation to Q12 of the MIR does **not take into consideration the contribution to be made by Whiteness, or the A96 Corridor**, in terms of existing supply. Whiteness Property Company would request clarification on the status of the most recently approved Housing Land Audit and the reasons for sites with existing planning permission being excluded from the Effective Land Supply in the MIR Table at the bottom of page 34.
- 3.32 As the MIR acknowledges, there is a difference between an allocated development site and a site which has the benefit of planning permission in terms of the likelihood of development actually coming forward. WPC understand the importance of delivering the required level of housing identified in the HNDA and are committed to fulfilling the terms of Outline Planning Permission, via reserved matters, as well as offering additional capacity in support of the Highland Council’s housing land requirements for the future. The focus of long-term expansion sites on the A96 Corridor would also indicate that existing sites within this area are best placed to satisfy increased housing need. Sites which already benefit from planning permission, and as such where the principle of housing development has been established, are well placed to accommodate higher numbers of housing units.
- 3.33 Whiteness has considerable capacity to expand the number of housing units which can be accommodated, along with the community facilities and services which they will require, within this existing and substantive landholding

4.0 Policy Changes

4.1 The following sections present WPC's views on the range of Policy Change options. In particular key Policy Change options of interest are:

- Affordable Housing
- Planning for an Aging Population
- Retailing
- Previously used land (Brownfield)
- Business and Industrial Land
- Access and Transport
- Coastal Strategy

Affordable Housing

- 4.2 As identified in the Main Issues Report and the HNDA, there is a significant shortage of affordable housing in most housing market areas of the Highlands. In particular, there is a backlog of demand for affordable housing in Skye & Lochalsh, Mid Ross and West Ross. The Highland Council proposes to address this issue by lowering thresholds for the provision of affordable housing and increasing the percentage of affordable housing required in some instances, while considering other means of providing these requirements.
- 4.3 WPC considers that lowering the threshold for the provision of affordable housing to 4 units to areas where there is a significant need could have the effect of reducing the number of housing developments which come forward. Smaller developments may already be less attractive to developers due to the lower profit margins achievable, hence having a negative impact on land values, particularly while house prices remain depressed.
- 4.4 Consideration could be given to accepting contributions from developers in order to address affordable housing shortfall in the area local to the development, while engaging with Local Housing Associations and specialist affordable housing providers to deliver the required housing units. It is recognised that this method has a resource implication for the Council in terms of management; however, it would give the Council control over the location and specification of affordable housing development.

- 4.5 The provision of affordable housing remote from the development site could also be considered. Affordable housing in rural areas may suffer from lack of transport links or community services and as such the provision of affordable units within settlements could address these concerns. In the case of developments of a small number of houses, it may benefit the developer and the Council to identify a suitable contribution towards the delivery of affordable housing in a nearby location.
- 4.6 The ability of the Council to look at each case individually in terms of the requirement for and the funding of affordable housing will provide flexibility in achieving the required level of affordable housing completions identified in the HNDA.
- 4.7 It is also considered that through further increased housing numbers at Whiteness, then this offers an opportunity for the delivery of a range of affordable housing options, including, key worker, shared equity and adapted housing. The focus should not solely be on social rented.

Planning for an Aging Population

- 4.8 The MIR and the HNDA both acknowledge that the Highland population is aging and that the percentage of the population over 65 is due to increase faster than those between 0 – 15 or 16 – 64 over the period 2006 to 2031: by 92.7% between 2006 and 2031 (Source: HNDA Table F4).
- 4.9 This indicates a significant increase in the requirement for homes suitable for the elderly; Table G1 of the HNDA predicts that the number of people potentially requiring adapted housing may increase by 62% across the Highlands between 2006 and 2021.
- 4.10 The Highland Council intends to address this issue in the Proposed Plan and include policies which will identify suitable sites for this type housing, identify a proportion of housing in forthcoming developments which should be provided as suitable for the elderly or disabled, work with care partners to identify preferred specifications and include guidance in the plan on care home provision.

- 4.11 Identifying suitable sites for adapted housing/assisted living accommodation would provide an opportunity for the Council to choose locations which can best accommodate those who require them. For instance, locations which benefit from nearby community facilities such as banks, post offices, shops and medical services. Mobility issues may be an important factor in choosing locations for adapted housing and the proximity of local services should be taken into consideration in identifying such sites.
- 4.12 As such, developments coming forward which are able to satisfy the requirements of those with mobility issues could have the potential to provide adapted housing, helping to meet the shortage of such housing which will result from the growing elderly population and to address the backlog of demand for special needs housing which exists at present. Locations within existing settlements are considered most ideally placed to provide this type of accommodation, as the network of community facilities will be well established and provide continuity for residents.
- 4.13 However, new settlements such as Tornagrain, Stratton and Whiteness could provide a proportion of housing units as suitable for the elderly/disabled. The provision of community facilities such as shopping and healthcare, amongst others, in such settlements would address the needs of less mobile residents and reduce the need for travel to other more established settlements nearby. A mix of types of tenure could address the need for sheltered housing, care homes and assisted living accommodation. Integrating this type of housing into new settlements could be used in tandem with affordable housing requirements, allocating a proportion of the affordable housing provision to be suitable for the elderly/disabled or substituting care home facilities for affordable housing provision, for instance.

Retailing

- 4.14 It is considered that as the development at Whiteness progresses, there should be commensurate levels of retail provision associated with the expanding location. An expanded Whiteness of 4,000 units should have an identifiable Town Centre, that can be worked up as part of the Masterplan and where community facilities and associated retail uses can be located and directed in time. This will allow for sustainable development and reduce development pressure elsewhere, potentially out of centre, for further retail provision. This view mirrors that detailed in the MIR pages for retail as the preferred strategy and answers Q17.

Previously used land (Brownfield)

- 4.15 It is documented in this section of the MIR, which is a reflection of a long held planning policy by government, that brownfield land should be developed in advance of greenfield sites. Whiteness has now been decontaminated and fully remediated. It is a brownfield housing site. On this basis, the additional housing units sought for Whiteness and which the Council will require to allocate for the Inverness/Nairn area, the first place considered should be brownfield sites. On this basis, Whiteness should be a preferred location for further growth along the A96 in advance of any greenfield sites. WPC request that this factor is taken into account when further land is sought to accommodate the level of housing growth that the Council envisage for this area. This is a consistent stance with that highlighted in the MIR for previously developed land.

Business and Industrial Land

- 4.16 It is considered that there are further landholdings at Whiteness, extending to 27.71Ha (68 acres) that may offer the future potential for future business and industrial land, that will again further enhance the settlement as a sustainable community. An economic reference to this potential at Whiteness would be welcomed in the Proposed Plan that supports economic development proposals, providing the planning policy framework for this future development potential at Whiteness. The high quality tourism potential of Whiteness and its marina should also be recognised and highlighted in the Proposed Plan.

Access and Transport

- 4.17 The WPC support the emphasis and priority placed on upgrading the A96 and believe the mechanism to secure its funding is as set out in the Developers Contributions comments earlier in this document. It is expected that the Proposed Plan will mirror the Local Transport Strategy and that Highland Council will pursue the availability of funding with the government, as the A96 upgrade is a national priority.

Coastal Development

- 4.18 The development at Whiteness and its contribution to Coastal Development via its new Harbour should be identified in the Proposed Plan. There is a clear relationship between the site and its aquatic habitat and this tourism potential should be referred to within the Proposed Plan. The development at Whiteness and its impact upon the marine environment are issues that have been dealt with via the granting of outline planning permission. There are Management Plans that support the view that the developed site and Moray Firth with its habitat species can co-exist and complement one another. Therefore the Coastal Development Strategy should be reflected in the Proposed Plan for Whiteness to reflect the current position of developing this site.

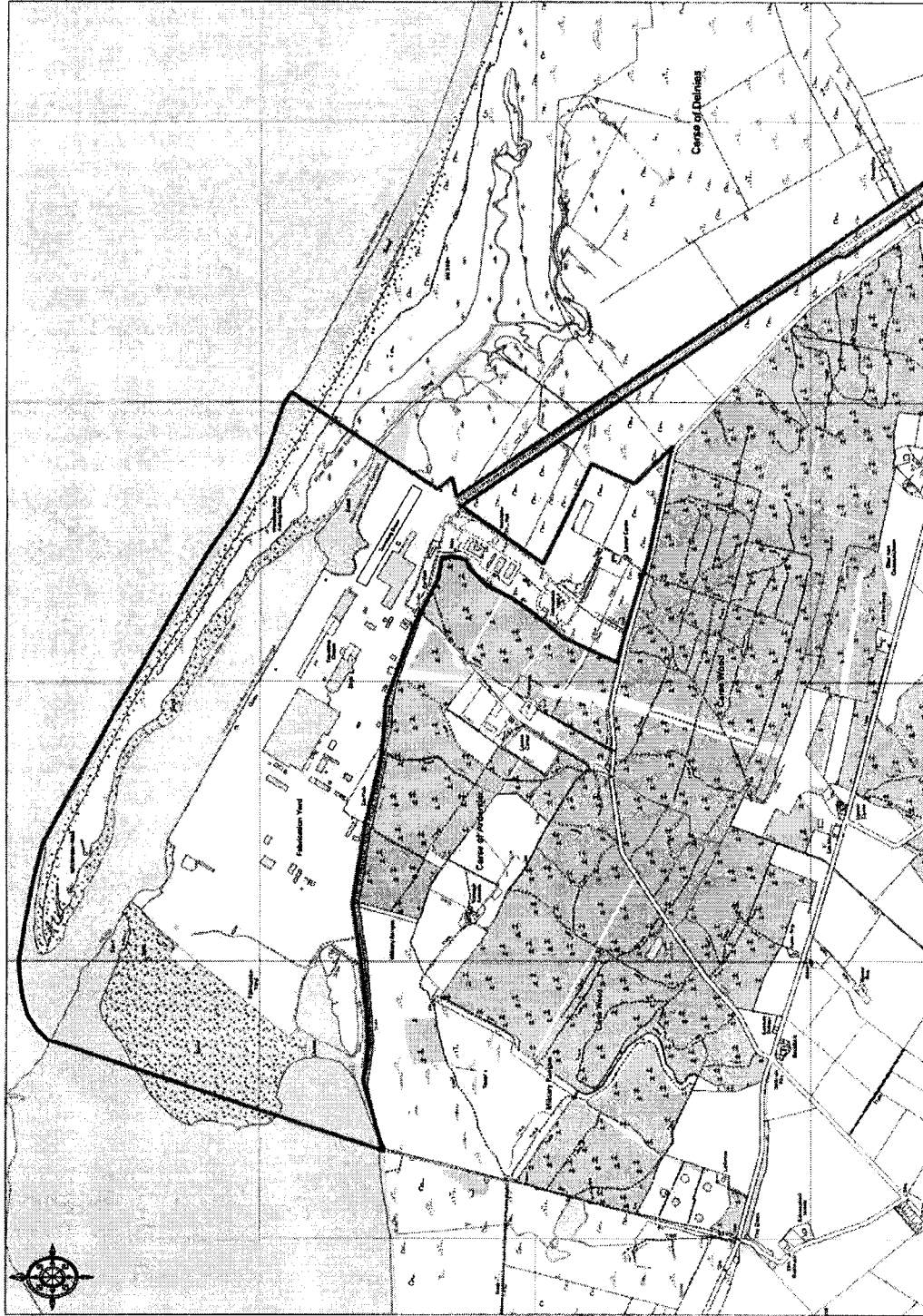
5.0 Conclusion

5.1 In summary the following points represent the views of the WPC and they would wish to see these reflected in the Proposed Plan;

- The Whiteness site is capable of doubling its unit numbers from 1950 to 4000 within the existing landholding and still be an internationally high quality residential / resort development.
- The Whiteness development site can assist Highland Council in accommodating its High Migration Scenario and provision of affordable housing in all tenure forms.
- The additional 2,000 houses that can be accommodated at Whiteness will still allow for further choice of the 5,000 remaining units that require to be accommodated in the Inverness and Nairn area.
- The WPC look forward to working with Highland Council, statutory consultees, government agencies and other developers to agreeing a formula and detail for the A96 Developers Protocol.
- The WPC would wish that 'Whiteness' is viewed as an 'Area Specific Issue' in the Proposed Plan.
- The Whiteness site is now de-contaminated and fully remediated brownfield site, it also benefits from major utility connections and capacity being available for up to 4,000 units.
The Whiteness site is capable of development in short term.
- The future potential for commensurate retail provision and an identifiable Town Centre should be highlighted in Whiteness
- The future opportunity to expand the settlement and provide business and industrial land should be recognised.
- The Tourism potential and the Marina should be highlighted, as these are attributes that offer future opportunities for Whiteness, due to its coastal location, but these can also have wider implications and could form a wider tourism function to attract people to the A96 Corridor.

**COLLIERS
CRE**

**APPENDIX 1
WHITENESS LOCATION PLAN**



© Crown Copyright 2009. All rights reserved. Licence number 100020449. Plotted Scale - 1:22158

