

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

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|--------------------------|----------------------|
| Reference Number: | HWLDP-MIR-208 |
| Organisation/Individual: | Doug and Joan Piggot |

Action:

| | |
|---------------------------------------|--|
| Immediate Response Required | |
| Meeting required with Respondent | |
| Issue for Area Local Development Plan | |
| Further Information Required | |
| Other (Please Specify) | |

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

| | |
|--------------------------------------|---|
| Purpose of Main Issues Report | |
| NPF2 for Scotland | |
| Vision for the Highlands | x |
| Inverness and A96 | |
| The A96 Corridor | |
| Phasing of Development | |
| Developer Contributions | |
| East Inverness | x |
| Nairn | x |
| Tornagrain | x |
| 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 | |
| Planning for an Ageing Population | |
| 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) | x |

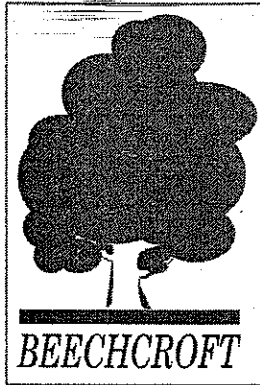
Key:

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

Notes:

Population figures need clarity
 Economic development by population growth but development should be jobs led
 Would like to see managed organic growth
 Profits are motivation for developers who are causing development pressure
 Population projections are optimistic
 Support for smaller settlements in A96 but with proviso of infrastructure improvement
 Nairn expansion is not necessary – bypass could be a double edged sword
 Regeneration of Inverness should take priority
 Development of Inverness is not as constrained to the North and West of Inverness

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



Wester Galcantray
Cawdor Nairn
IV12 5XX

[Redacted]
7 November '09
[Redacted]

We welcome the opportunity to respond to the MIR. It is not our intention in this response to attempt an appraisal of the entire content since much of it can only be responded to by those most affected by local development. It is therefore our local area of Inverness, Nairn and in particular the A9 Corridor development upon which we concentrate.

Given that Highland Council had approximately 10 years to create the contents of this document, it seems hardly fair that the people of the Highland area have been given 10 weeks to respond. We are also concerned that the period of time for consideration of this document has been curtailed.

In addition, the publicity which the document received seems totally insufficient considering the complexities of what is being proposed. Many people are indeed unaware of the consultation.

Doug and Joan Piggott

By 2030, the Highlands will be one of Europe's leading regions. We will have created sustainable communities balancing population growth and economic development across the area, and have built a fairer and healthier Highlands.'

Comment...Laudable, but to date there has been no mention of the creation of jobs to support this statement. It is *employment and amenities*, landscape and accessibility which attracts people to this area, not an oversupply of housing.

To deliver this vision, we have suggested a number of plan objectives. These objectives are based around the five local outcomes from the Highland Single Outcome Agreement. The possible options for delivering these objectives form part of this Main Issues Report.

Sustainable Highland Communities

To increase the population of the Highlands to achieve a balanced age range by providing opportunities for market housing and affordable housing both within settlements and within the Highland countryside;

Comment : Population growth as quoted in this document *is unsubstantiated and no attempt has been made to justify the aspirational approach adopted by the authors*. The statement 'balanced age range' is outwith the control of Highland Council and it would be interesting if Highland Council could publish a breakdown of the age balance achieved during the much-quoted 'growth period'.

To provide for developments which cater for Highland's ageing population;

Comment : This category is one which will expand considerably over the next 20 years, and will demand much in the way of social infrastructure to deal with it.

To make sure that new development meets the needs of the whole community, both now and in the future, and makes the area a more attractive place for residents and businesses to move to.

Comment : People do not come to this area to see new development, they come because of the attractiveness of the area *as it is*.

and to ensure the effective delivery of the plan strategy through efficient and transparent use of developer contributions and the linking in to Council and partner agency development programmes.

Comment : There are inherent dangers of development becoming 'developer-led' through the contribution of funds to secure infrastructure. What happens when funds are refused? At this time, the beginning of government austerity measures, funding for much of the required infrastructure will not be there.

Safeguarding our environment

To ensure that development of renewable energy resources are managed effectively with clear guidance on where renewable energy developments should be located;

Such as the intended visual destruction of the iconic Loch an Dorb, not to mention the fact that it is designated to be built on peat?

To make sure the quality of the natural, built and cultural environment in Highland is protected and where possible enhanced;

Comment : We fail to see how the overdevelopment of, in particular, the A96 Corridor, will enhance the quality of life for anyone.

To help Highland take the lead in reducing the amount of carbon dioxide released into the air, adapt to the effects of climate change and limit the amount of non-renewable resources development uses.

Comment : Will this be achieved by developing Tornagrain or Delnies? No.

A Competitive, Sustainable and Adaptable Highland Economy

To provide opportunities which encourage economic development and create new employment across the area, whilst at the same time improving the strategic infrastructure necessary to allow the economy to grow over the long term;

Comment : Agreed. Economic development must be driven by job creation, not by population growth. If the work is there the people will come to the region, and thus create a demand for housing.

To help deliver transport infrastructure improvements across the area in line with the Council's transport strategy and the Scottish Government's Strategic Transport Projects Review

Comment : At this time, the beginning of government austerity measures, funding for much of the required infrastructure will not be available.

To ensure that new developments contribute towards reducing the need to travel and encourage people to walk, cycle or use public transport

Comment : Given that their place of employment is on their doorsteps. Tornagrain?

To ensure that the planning guidance for mineral development, coastal developments, forestry, agriculture and croft land is clear and consistent and that key resources are protected where appropriate.

To provide for investment in services and infrastructure, and opportunities for investment and diversification in the economy, in our deprived areas and areas at risk of long term unemployment as a result of changes in the wider economy (this objective is related to all of those set out above, and to our spatial strategy, so does not have a specific chapter in this Main Issues Report).

Comment : At this time, the beginning of government austerity measures, funding for much of the required infrastructure will not be available.

Alternative that we would like to see -

Managed organic growth, as and when needed is surely a viable alternative.

Where should growth go and how can we deliver it? (The Spatial Strategy)

The spatial strategy for Highland is summed up in the following section. Particular focus is given to the development issues around Inverness and Nairn (the A96 Corridor), Caithness and North Sutherland and Nigg given the development pressures these areas are currently experiencing. The existing Local Plans which cover these areas are beginning to be out of date in respect of these pressures, and it is important these are begun to be dealt with now rather than waiting until the preparation of the Local Development Plans that will follow.

Just as important however to the development strategy of the Highlands as a whole is the role of the other towns and villages and the approach to development of the wider countryside.

Comment : Pressures as stated in this paragraph are entirely developer-led, i.e. profit led. Since population growth figures are wildly optimistic, and with funding for necessary infrastructure not available until 2016/17 at the earliest, are we to believe that two negatives make for positive growth? This argument is certainly applicable to the A96 Corridor.

Tornagrain

Tornagrain is a new settlement proposal in the centre of the Corridor, capable of providing almost 5000 houses over the next 30-40 years. It has been selected as one of the Scottish Government's Sustainable Community Initiative proposals. The potential for a new settlement in the Inner Moray Firth was identified in the Highland Structure Plan. Tornagrain was specifically identified as a potential location for a new settlement as part of the A96 Corridor Framework work. A planning application has now been submitted for the new settlement.

The principle of a new settlement at Tornagrain is supported as part of the long term development strategy for this area. The design principles are based around the delivery of new homes, jobs and services within a compact and sustainable town. This will increase the choice of locations within the A96 Corridor and support the case for transport and access improvements. It will also divert development pressure from more inappropriate locations and therefore allow for the retention and creation of green space and green networks.

Comment ; We do not agree with the Preferred Option.

The alternative to this proposal is for Tornagrain to be dropped as an integral part of the development of the A96 Corridor.

Reasons:

- 1 Population expectations as put forward by Highland Council are wildly optimistic.
- 2 The choice of the build area, given its proximity to Inverness Airport and the A96, cannot be supported.
- 3 The intended site is at present valuable farmland which should be protected and maintained.
- 4 The proposal cannot be described as either a sustainable or green option.
- 5 The reliance on 'commitments' from agencies to ensure infrastructure is in place when required in the present and ongoing financial situation is misplaced and dangerous.

- 6 'Infrastructure first', as indicated by both John Rennilson and Malcolm MacLeod must be in place. Piecemeal development of sites is not acceptable, neither is piecemeal infrastructure provision.
- 7 Major transport infrastructure must be completed prior to building. Without it the A96 between Nairn to Inverness will become ever more congested forcing more drivers onto unsuitable minor roads such as the B9090 and B9006.
- 8 The selected area for development will have detrimental effects on the communities of Ardersier and Croy.
- 9 Green spaces do not have to be created...they are all around us.

Smaller Settlements in the A96 Corridor

We think we should:

- identify the potential for growth of the smaller villages in the A96 Corridor area as set out in the A96 Framework; and
- identify the appropriate scale of development that may be *expected* in these areas.

Probably agree but with the following comments and provisos:

Cawdor

We note that 'Cawdor is subject to pressure for development', however this pressure is from the major landowner in the area and not from individuals who wish to build. The emergence of the 'master plan' for Cawdor came as a surprise to most, and many people in the area do not wish it to go ahead as envisaged. The preference is for the many gap-sites within the village to be developed, on an as required basis. The notion that the Cawdor - Inverness road, the B9090 becomes the 'High Street' of the village is not acceptable since this will create traffic hazards.

The area designated for the expansion is high quality farmland which should not be used for building.

Expansion will also greatly increase pressure on the B9006, Clephanton / Inverness.

Croy

The further development of Croy will lead to even greater pressure on the B9006 because of major problems on the A96, This possibility must lead to the upgrading of the minor road which joins the A96 at the airport roundabout prior to any additional housing in Croy. This will also take pressure off Inches Roundabout, Inverness.

The proximity of Tornagrain will have disastrous effect on Croy.

Culloden Moor

If expanded, this must not happen until road infrastructure is in place to allow ease of access to Inverness.

Updated transport/ water/ drainage infrastructure must be in place before any of the above is permitted.

Nairn

Some of the key issues for Nairn are:

the need to confirm in the Local Development Plan the proposal for the town bypass and the requirement for longer term development proposals to contribute to its provision;

to ensure that longer term proposals around Nairn enhance the distinctive role and historical development of the town;

for new development to complement efforts to regenerate the town centre; and

to work with the community and developers in the area on a realistic and deliverable phasing of development, with community facilities, education and open space improvements being central to delivery

Comments :

The expansion of Nairn would appear to be an unnecessary component of the A96 Corridor development written in to the MIR by the authors.

While the by-pass would be of benefit in easing traffic flow, there is a fear held by some that the by - passing of the town will be a double-edged sword in economic terms.

The development of both the Sandown and Delnies developments will create huge traffic problems on the A96 Nairn - Inverness if both of these sites are to be served by one access roundabout prior to the construction of the by-pass which, as just stated, is highly unlikely to commence before approximately 2025.

The Delnies site is high quality farm land which should not be built upon.

We fail to see the benefit of housing construction commencing before sources of employment are secured.

Necessary infrastructure for such development should not be seen as simply the by-pass. Updated links to the hinterland around will also require to be in place.

Inverness and the A96 Corridor

The continued growth and development of Inverness and the surrounding area is essential so that the Highlands can continue to prosper. Parts of the current Local Plans for the Inverness and Nairnshire areas will need to be altered by the Highland wide Local Development Plan, particularly in order to help the long term growth anticipated (?) for this part of Highland.

Inverness

This Main Issues Report is being published partly to help the debate about how the city of Inverness can grow over the next twenty years and beyond. The city of Inverness has seen a lot of development over the last ten years. In particular the number of houses built around the city has led to substantial change and supported economic growth.

The map shows the rates of housing development around the city over the last five to ten years. It shows that the main areas identified for the expansion of the city are being completed and that we need to identify a long term supply of land for housing and other uses.

Some of the sites identified in the current Local Plan for Inverness remain available for development, and are capable of providing for the housing need in the next three to five years. In that respect it may be important that the existing plans for the growth of the city to 2011 are completed before there is major expansion in other areas. Because of the changes in the city, there are other issues that need to be addressed, particularly in terms of improving accessibility and transport, supporting the city centre and increasing the amount of building on land which has been formerly used (brownfield development).

East Inverness is the most important area for the future expansion of the City in the short term. Along with the significant delivery of housing, business and commercial opportunities for the period after 2011, the delivery of the A96-A9 link and the campus site at Beechwood are immediate priorities supported by the Framework. The map and table below show the detailed proposals for East Inverness. A number of large planning applications are already submitted in this area, and it is important that our Proposed Plan provides guidance as to what can be allowed to be built, particularly in the short term.

Some of the key issues for the East Inverness area are:

- the development of the Beechwood campus and the provision of access improvements which will allow the development of Inverness College and related activities to progress;

- for further work to be carried out with Transport Scotland on the proposals for the A96 - A9 link and other public transport improvements such as Park and Ride, which will improve access to the east of Inverness and help in opening the priorities that there are for transport improvements which will help alleviate some of the current "bottle-necks", for example at the Inshes roundabout;

~~the priorities that there are for transport improvements which will help alleviate some of the current "bottle-necks", for example at the Trishes roundabout;~~

how the city can further benefit from integrating new development with some of our natural assets like the river, canal, sea-front and landscape;

how community facilities can be improved across the city as part of development proposals that come forward; and

how the design of new development will complement the historic growth of the city in a way that is sustainable and makes best use of the land available.

What is our Preferred Option for dealing with these Issues?

We think we should:

prepare an updated city vision to inform where the key development and infrastructure priorities are for the city (such as those detailed above) and include this work in the Proposed Plan;

highlight the major development sites still to be developed in Inverness in the Proposed Plan (listed above) and prioritise how and when these sites should be developed;

prepare masterplans to highlight opportunities and provide guidance on how the development of these sites will affect the phasing of development in the A96 Corridor (or alternative);

link our planning work closely with the work being done on the Local Transport Strategy to ensure that priorities for transport improvements to roads, public transport, cycling or pedestrian facilities are supported.

What is an alternative to this Preferred Option?

Another strategy would be to focus our efforts on opening up opportunities in the A96 Corridor (or alternative) as opposed to seeking the early consolidation and development of the existing areas identified within the city. Whilst this would ensure a long term supply of land for the whole area, it would not guarantee that some of the large sites currently allocated for expansion or regeneration are promoted as early priorities. We would also miss the opportunity to provide an up to date city vision that reflects our current thinking.

In principal we agree with the preferred option with provisos.

Regeneration of the original town centre should take priority.

The immediate area around the existing College should be used to extend the college as the new university campus since the construction of the campus at Beechwood will deprive the town centre retail outlets of much of their custom.

The intended site at Beechwood, if not used for campus, would augment the land supply for housing *when required*.

The ~~second town~~ centre should not be undertaken until such time as the main centre of the city is secure.

Brown field sites within Inverness must be utilised first before *any* building on green field sites.

The A96 Corridor 'Masterplan' should *not* include Tornagrain. It is superfluous to requirements and cannot be described as a sustainable development.

The A96 Corridor

A lot of work has been carried out over the last few years on identifying where the long term growth areas for the city of Inverness and the surrounding area should be located. Inverness has a number of constraints to growth, largely based on physical factors.

Development opportunities to the west of the city are limited by the canal and river crossings and by the landscape. Land to the south of the city is constrained by the steep slopes.

Opportunities to the north are limited by the Moray Firth and the capacity of its crossing by the Kessock Bridge. As a result development to the east of the city has been identified as the most deliverable long term growth opportunity. This land is also comparatively flatter, better drained, better connected to transport links and offers equivalent or better outlook and climate than the alternatives.

The maps in this section of the report identify the main strategic sites identified for development in the A96 Corridor. The A96 Corridor has been identified in the National Planning Framework as an "area for co-ordinated action", and is the main focus of growth in the Inner Moray Firth. Since the A96 Corridor Framework was prepared, there have been a number of important questions raised that will affect whether and how the land identified for development can be taken forward in the Highland wide Local Development Plan and future plans that will follow on afterwards. Some of these issues are corridor-wide and some are specific to the individual areas involved (East Inverness, Nairn, Tornagrain and the smaller settlements in the Corridor).

Corridor wide issues

Our view is that the development principles behind the A96 Corridor Framework, particularly in terms of providing a wide choice of development land to meet future housing requirements remain valid. This view is supported by the National Planning Framework 2 prepared by Scottish Government. Our Monitoring Statement and Housing Need and Demand Assessment illustrate the need for more housing in this area. There has however been some opposition to these plans for growth, and this consultation allows people the opportunity to set out or restate their views on where development for the future should go.

Phasing of development (what can happen where, when)

The full development of the A96 Corridor Framework depends upon a number of improvements to the infrastructure between Inverness and Nairn.

These improvements include dualling of the A96, a new bypass for Nairn, a new road link between the A96 and the A9, improvements to wastewater treatment around Nairn and a new water supply for the Inverness and Nairn area as a whole. It will also include the building of new primary and secondary schools and improvements to the community facilities in the area. These needs were demonstrated by a series of studies prepared for the Council when the Framework was being drawn up. In order to ensure that development of the A96 Corridor can take place in a managed way, further work is being undertaken to confirm at what point these improvements to the A96 Corridor are required. This work includes an update to a transport model, so that the results can be included in the Proposed Plan. This will help determine what parts of the developments identified in the Framework can progress before the big improvements such as the A96-A9 link, the upgrade of the A96 and the Nairn by-pass are put in place.

An important role for the Local Development Plan is therefore to set out the phasing of development in the A96 Corridor to indicate what development can progress initially within the period between 2011 and 2016 and the period between 2016 and 2021.

Comments :

The Kessock bridge itself does not create constraint upon development to the north. Might it not be the roundabout at its southern end which creates the problem? It is a fairly straightforward civil engineering task to alleviate the problem.

Development to the west could be made a viable option by reconstructing/ renewing the Clachnaharry railway bridge.

Development to the south has not been, to date, affected by 'steep slopes'.

The statements which give climate differences between areas as a reason for no development to either west or north *cannot be taken seriously* as a reason to develop solely within the corridor.

Development to the north of the city of Inverness would itself benefit smaller towns and communities such as Dingwall, Invergordon and AIness.

The inclusion of the A96 Corridor in NPF2 is because of Highland Council pressure.

No aspect of the A96 Corridor should be started until such time as road, water and foul water infrastructure is in place. We would also like to point out that it is not only the immediate Corridor area which will require new and updated infrastructure. Communities around the development will be severely affected if updated transport facilities are not in place, i.e. the B9090, B9006 and the Croy links to the A96.

We consider that solely developing the A96 Corridor would adversely affect the wellbeing of much of the remainder of the Inner Moray Firth area, and would have repercussions across the whole of Highland.

