

HALLIDAY FRASER MUNRO
PLANNING

By Email Only

29 April 2011

Our Ref: CF/P1694

IMFLDP Call for Sites
Director of Planning and Development
Glenurquhart Road
INVERNESS
IV3 5NX

Dear Sirs

**IMFLDP CALL FOR SITES
LAND AT WESTER INSHES, SOUTH OF WEST PARK, INSHES
REPRESENTATION ON BEHALF OF RF MORE PROPERTIES LTD**

Halliday Fraser Munro Planning have been instructed by our client, RF More Properties Ltd, to make representation to consultation on the Inner Moray Firth Local Development Plan on behalf of land at Wester Inshes.

The area owned by our client, and thereby the subject of this representation, is illustrated on the enclosed map. The site is currently zoned as residential land within the adopted Inverness local Plan (2006). An application for the development of the site is currently pending consideration (08/00613/OUTIN), and is actively being progressed.

The purpose of this representation is to reaffirm to The Highland Council the commitment of our client to develop this site for residential use in the short term. As such, we write to request that this existing zoning be continued within the new Inner Moray Firth Local Development Plan. Continuing this zoning will assist the Council in meeting strategic housing targets, and encourage a mix of house types to be provided in the local housing market area.

Further, we write to request that the Council accept the potential and capability of the site to contain a higher density of development than that which is currently contained within the Inshes and Milton of Leys Development Brief. Currently this Brief suggests that the site, as a whole, should provide a 'medium' density development.

Upon undertaking a detailed capacity exercise, we consider that a higher density of development could be contained within the northern area of the site inspired by, for example, policy contained within the Scottish Government's Designing Places (2010) document, for successful and sustainable high density suburban residential developments. A Plan prepared by Halliday Fraser Munro to illustrate such is enclosed with this submission.

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REG. ELECTRICAL

29 April 2011

Further, in line with The Highland Council's Open Space in New Residential Developments: Supplementary Guidance (2009), we consider that any reassessment of the site through the new Local Development Plan or through the production of a new Development Brief for the area, should recognise the potential to utilise those existing mature tree belts into the public amenity space for the site. These areas should be recognised as of high amenity value and fundamental to our client's site development strategy.

The appropriate Call For Sites Site Form and Strategic Environmental Assessment Form have been completed and are enclosed for your records. We trust that these, and the above, will be given appropriate consideration in your assessments. We would be happy to meet with the Council to discuss our client's proposals in further detail should you consider this helpful.

We look forward to hearing from you in due course. Should you have any queries on the above, or require any further information, please do not hesitate to contact Claire Fowler on 01224 388 700 / claire.fowler@hfm.co.uk.

Yours sincerely



Claire Fowler
Senior Planning Consultant
Halliday Fraser Munro



Site Forms

YOUR DETAILS	
Your Name (and organisation if applicable)	Miss Claire Fowler
Your Address / Contact Details	Halliday Fraser Munro
	Carden Church
	6 Carden Place Aberdeen, AB10 1UR
Landowner's Name (if known / applicable)	R F More Properties Ltd
Agent (if applicable)	As above
Agent's Address / Contact Details (if applicable)	

DETAILS OF SITE SUGGESTED	
Site Address	Land at Wester Inshes, South of West Park, Inshes
Site/Local Name (if different from above)	As above
Site Size (hectares)	
Grid Reference (if known)	
Proposed Use (e.g. housing, affordable housing, employment, retail, waste, gypsy traveller, utility, community, retained public open space)	Residential Development
Proposed Non Housing Floorspace / Number of Housing Units (if known/applicable)	
Map	Please find attached

If you wish to suggest a site that should not be built on, fill in this form	
REASONS WHY YOUR SITE SHOULD BE SAFEGUARDED FROM BUILDING	
How do the public enjoy the space - e.g. used for dog walking, children's play?	N/A
What makes the site more special than other areas in the village/town?	N/A
Does the site have attractive or rare features such as mature trees, historical significance or protected wildlife?	N/A

Landowners, developers and/or agents wishing to suggest a site should fill in the following form and as much as possible of the strategic environmental assessment form (at the end of this document) which assesses the environmental effects of possible development sites.

If you wish to suggest a site that should be built on, fill in this form	
REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION	
How can the site be serviced? (give details of proposed access, foul drainage, surface water and water supply arrangements)	The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established. The site has previously demonstrated its accessibility and connections to infrastructure.
FORM CONTINUES BELOW	

REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION

<p>What are the site's constraints and how can they be resolved or reduced? (e.g. does the site flood, are there protected species present, will good farmland be lost, will the local landscape be affected, will valued trees be felled, are any other heritage features likely to be affected?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p> <p>The site is located outwith the functional floodplain, and measures would be undertaken to ensure any tree felling required is limited.</p>
<p>What benefits will result to the wider community from the site's development? (e.g. will there be more or better jobs, will the land be put to a more productive use, will the development increase infrastructure capacity for others, will more affordable houses result, is there an unmet demand for the development?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p> <p>Development of the site for a higher density than currently suggested would help to achieve targets for new homes in the area.</p> <p>Development would result in short term job creation in the construction process.</p>
<p>What impact will there be on travel patterns from the site's development? (e.g. will more or less people engage in active and healthy travel (walk / cycle) or go by public transport as a result of the site's development rather than travel by private car?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p> <p>As part of the wider Inshes development, the site layout will encourage permeability and the promotion of sustainable transport modes as an alternative to the private car.</p>
<p>Is the site well connected? (e.g. will the average travel time to community and commercial facilities reduce or increase as a result of the site's development, is the proposed use compatible with existing / proposed surrounding uses?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p> <p>We consider the site to be very well connected, and compatible and complimentary to existing and proposed surrounding land uses.</p>
<p>Is the site energy efficient? (e.g. will the site allow for energy efficient siting, layout, building design and local renewable energy source connection?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p> <p>A sustainable approach to the design and construction of the development has been adopted by our client.</p>
<p>What other negative impacts will the development have and how will they be resolved or offset? (e.g. will the site's development increase any form of pollution or decrease public safety?)</p>	<p>The site is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.</p>

STRATEGIC ENVIRONMENTAL ASSESSMENT FORM

Landowners, developers and/or agents wishing to suggest a site should fill in as much as possible of the following form. Strategic environmental assessment of local development plan sites is now a statutory requirement and considers the possible environmental effects of development proposals. We will check your answers and fill in any gaps.

No.	Issue	Detailed Explanation	Answer	Any Proposed Mitigation Measures (how will you reduce or offset the effects of your development?)
1	a) Will the site safeguard any existing open space within the area? b) Will the site enable high quality open space to be provided within the area?	Will the site have any impact on useable public open space (such as parks, playing fields etc) or any opportunities to create additional public open space?	An appropriate provision of open space would be provided as part of the development of the site.	
2	Will the site encourage and enable provision for active travel (walking, cycling and public transport use)?	Is any part of the site within 400m straight line distance of any community/commercial building? or will development provide a community/commercial building within walking distance of existing residential areas? Are there opportunities to create new walking/cycling routes or improve existing routes?	The site is located in a sustainable location, accessible by a number of transport modes (e.g. bus, bicycle, on foot).	
3	Does the site provide an opportunity for you to provide a financial contribution towards encouraging more sustainable travel patterns?	For example, can a subsidy to a local bus route be provided?	It is considered that the site can already be accessed by public transport, and no additional services would be required	
4	Will the site involve "off site" road improvements that will contribute to road safety?	Is the site likely to improve the local road network such as junctions or crossings?	It is considered that the proposals would have no / limited effect on the local roads network.	
5	Is there scope for road safety measures as part of the development of the site?	Will development incorporate on-site traffic calming measures (e.g. speed bumps) or street lighting? Will it incorporate the principles of Designing Streets available via: http://www.scotland.gov.uk/Publications/2010/03/22120652/0	Should it be considered necessary, appropriate road safety measures could be incorporated into the development.	

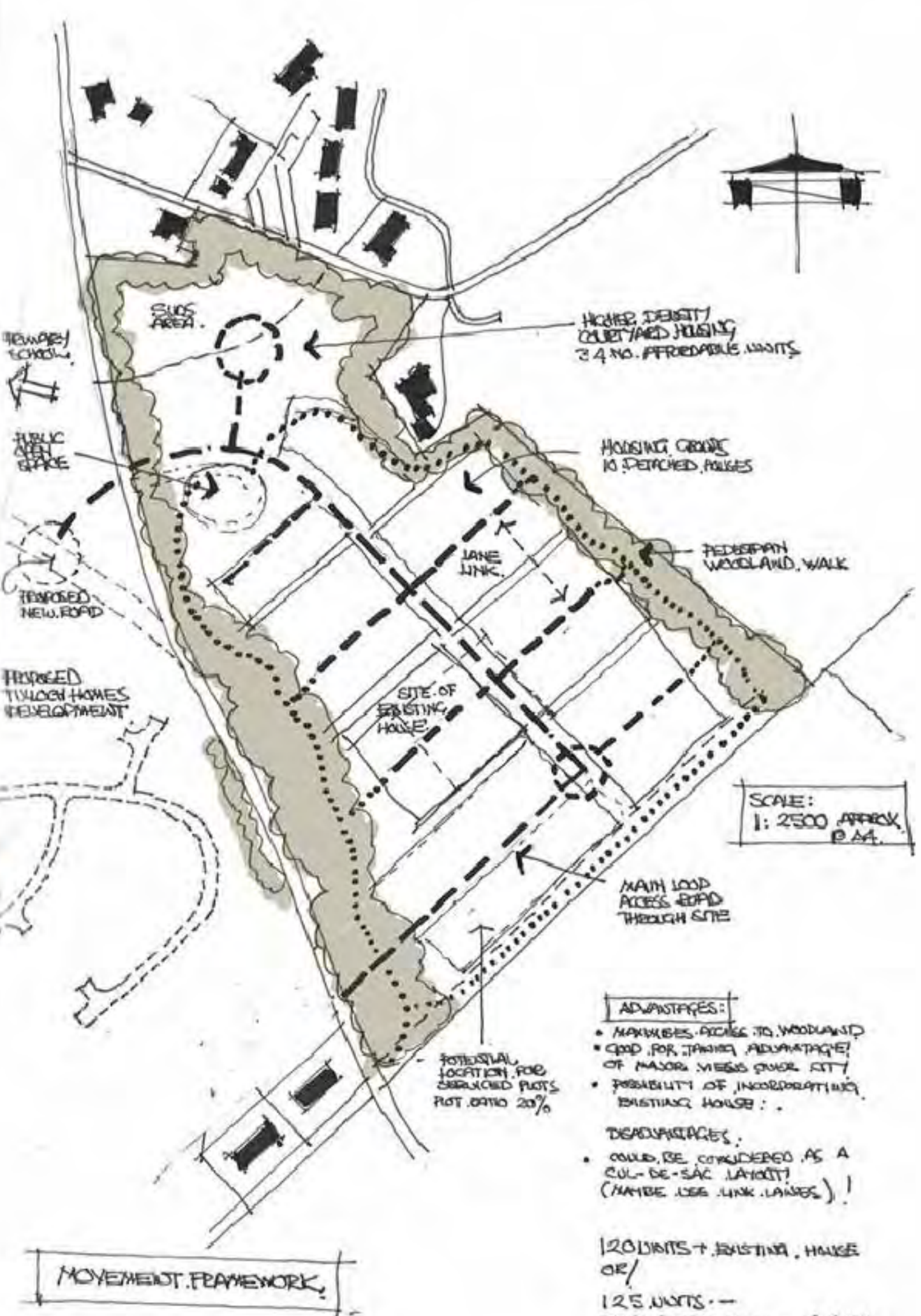
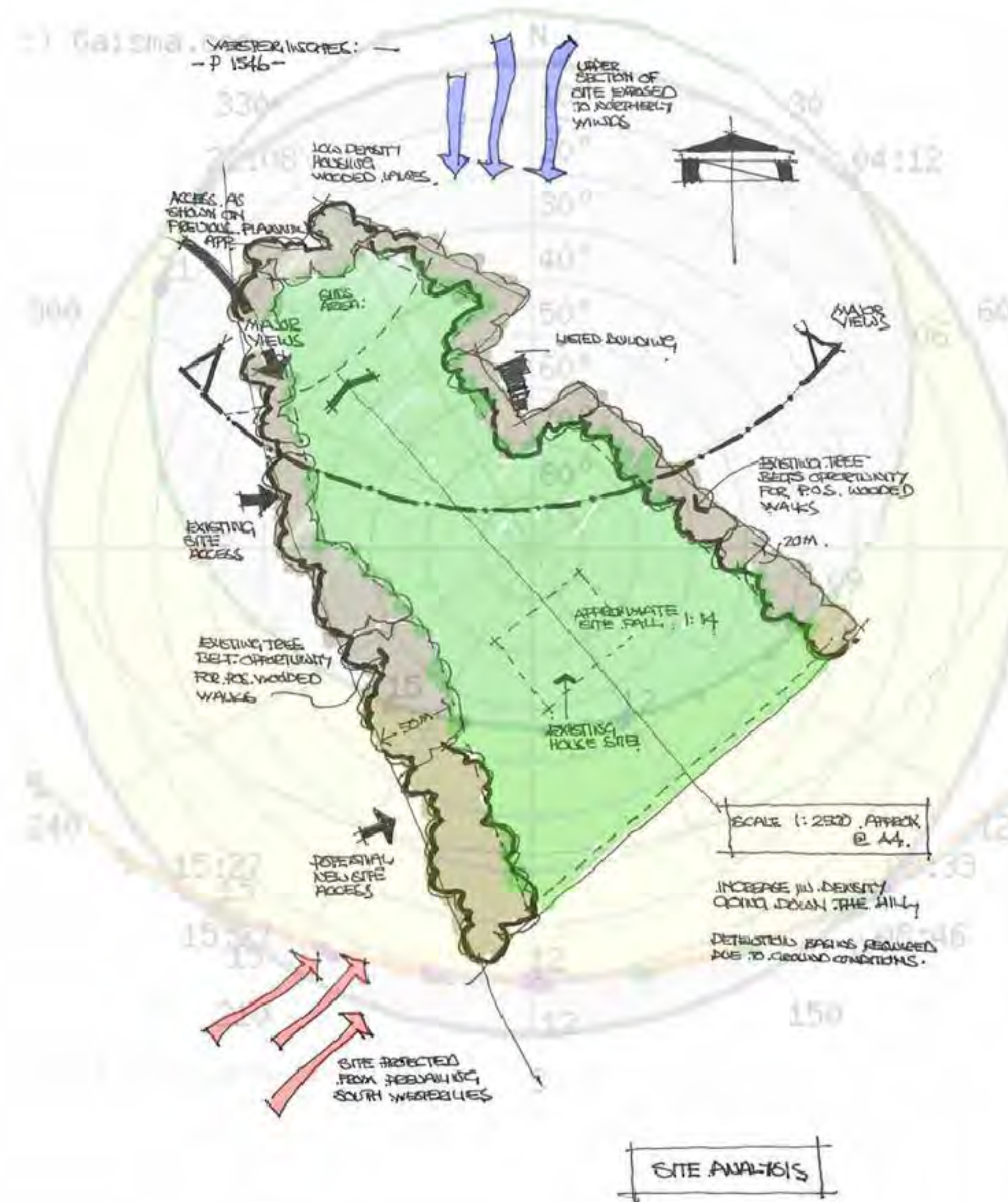
6	Is the site near any existing "bad neighbour" uses?	Will the site be negatively affected by any neighbouring use? (bad neighbour uses include those that affect residential property by way of fumes, vibration, noise, artificial lighting etc). Is the site affected by any of the Physical Constraints identified in the Council's Physical Constraints: Supplementary Guidance?	The site is not understood to be near to, nor would result in, a 'bad neighbour' development.	
7	Are there any contaminated land issues affecting the site?	Are you aware if the site has been previously used for industrial or any other uses likely to cause contamination?	N/A	
8	a) Is the site on derelict, vacant or other land that has previously been used? b) Is the site on greenfield land?	a) Has the site been identified in Scottish Government's Vacant and Derelict Land Survey (which can be found here: http://scotland.gov.uk/Publications/2010/01/26135819/0) or has the land got an existing use? b) Will the site be located on presently undeveloped land e.g. presently or capably used for agriculture, forestry or amenity purposes?	The site is currently agricultural land, however is allocated for residential development within the currently adopted Inverness local Plan (2006). The principle of development on the site has therefore already been established.	
9	Is the site within the current settlement boundary?	Is the site within any identified settlement boundary in the Local Plan? Is it allocated for any uses?	The site is within the settlement boundary of Inverness, and is allocated for residential development within the currently adopted Inverness local Plan (2006).	
10	Will the site affect the distinctiveness and special qualities of the present landscape character or affect any landscape designation?	Does the site conform with the Landscape Capacity Assessment (if available)? Will the site result in the removal of valued landscape features or negatively affect any key views? Is it located within or would otherwise affect a National Scenic Area or Special Landscape Area, having regard to their special qualities?	Existing woodland surrounding the site would be retained. No other significant landscape features exist on the site and it is not considered that the development of the site would detrimentally affect the surrounding landscape character of the area.	
11	Will the site affect any areas with qualities of wildness? (that is land in its original natural state?)	Are you aware if the site is inside or likely to affect an area of Wild Land? (These areas are identified on Map 3 of SNH's Policy Statement, Wildness in Scotland's Countryside) and areas of Remote Coast identified by the Council, or an area of wildness identified in the draft Wild Land Supplementary Guidance?	No impact expected.	

12	Will the site affect a conservation area?	Is the site inside or likely to affect the character of a confirmed Conservation Area?	The site is not located in, or in the immediate area of, a conservation area.	
13	Will the site impact on any listed building and/or its setting?	Is there a listed building or a part of the setting "area" of a listed building within the site?	No buildings / features on the site are listed for their architectural or heritage value. The Category C(S) listed Helen's Lodge lies adjacent to the site and has been appropriately considered in our client's proposals.	
14	Will the site affect a site identified in the Inventory of Gardens and Designed Landscapes?	Is any part of the site inside the outer boundary of an Inventory "entry" or will the site affect the setting of an "entry"?	The site is not located in, or near to, any registered Designed Landscape or Garden.	
15	Will the site affect any locally important archaeological sites identified in the Historic Environment Record?	Does the site contain any features identified in the HER? If yes, will the site affect the feature?	It is not expected that the site will have archaeological potential.	
16	Will the site impact on any Scheduled (Ancient) Monument and/or its setting?	Is there any SAM within the site boundary or will a SAM be affected?	No Scheduled Ancient Monuments exist on, or in the immediate vicinity of, the site.	
17	a) Will the site affect any natural heritage designation or area identified for its importance to nature conservation? b) Will the site affect any other important habitat for the natural heritage?	a) Is any part of the site inside or likely to affect the designation (SAC, SPA, SSSI, NNR, Ramsar) or Local Nature Conservation Site? b) Is any part of the site within or likely to affect non-statutory features identified as being of nature conservation importance e.g. Ancient, Semi-Natural or Long-Established Woodland Inventory sites, priority BAP habitats, habitats included on the Scottish Biodiversity List, non-designated habitats listed in Annex 1 of EC Habitats Directive?	No impact expected.	
18	a) Will the site affect any protected species?	a) Will the site affect any European Protected Species, Badgers and species (birds, animals and plants) protected under the Wildlife and	It is considered that the habitat value of the site is likely to be limited. A badger survey has been commissioned.	

	b) Will the site affect any other important species for the natural heritage?	Countryside Act 1981 as amended. If such a species may be present on or near the site, a survey should be carried out to inform this assessment (for which a licence from SNH may be required) b) Will the site affect species listed in the UK and Local BAPs, the Scottish Biodiversity List and relevant annexes of the EC Habitats Directive?		
19	Is the site proposed to provide any form of renewable energy?	For example, will the site provide or be capable of providing a district heating system, solar panels or a wind turbine?	A sustainable approach to the design and construction of the development would be investigated by our client at the appropriate time.	
20	Is any part of the site at risk from fluvial or coastal flooding as shown on SEPA's flood map or from local knowledge?	Are you aware of any part of the site being within the 1 in 200 year flood risk contour as identified by SEPA? (which can be found here: http://www.sepa.org.uk/flooding/flood_risk_maps/view_the_map.aspx)	The site is located outwith the functional floodplain.	
21	Will development of the site result in the need for changes in land form and level? If yes, how will soil and drainage issues be addressed?	Will there be any change in rate, quantity, quality of run-off plus groundwater impact on or off site? If so, will these affect priority habitats, especially blanket bog?	The site is relatively flat, therefore it is not expected that any significant changes in land form / levels would be required for development.	
22	Is there a watercourse, loch or sea within or adjacent to the site? If yes, how will the water environment be protected from development?	Will there be any culverting, diversion or channelling of existing watercourses?	We understand that no watercourses exist in, or cross, the site.	
23	Will the site offer opportunities for sustainable waste management?	Will the waste produced by the site be minimised and processed close to source in a sustainable way?	A sustainable approach to waste management would be investigated by our client at the appropriate time.	
24	Can the site be connected to the public water and sewerage system?	Can the site be connected at reasonable cost? If not, what alternative is proposed?	The site can connect to local infrastructure provisions.	

25	Will the site require alteration to the local landform?	Can the site (including access) be developed without significant re-contouring etc.? Will access tracks and parking areas have significant cut and fill?	To be confirmed.	
26	Will the site affect or be affected by coastal erosion or natural coastal processes?	This will be noted on any relevant shoreline management plan.	The site is not located near the coast or any shoreline.	
27	Is the site sheltered from the prevailing wind and does it have a principal aspect between SW and SE?	Will development make best use of the site in terms of energy efficiency?	A sustainable approach to the design and orientation of the development has been adopted by our client.	
28	Will the site have any impact upon local air quality?	Is the site near areas of employment or close to public transport? Such developments are less likely to result in additional traffic which may contribute to air pollution.	It is not expected that the site would result in any detrimental impact to existing air quality.	
29	Will the site have an impact on light pollution levels?	Is it likely that the Council policy likely will require street lighting at this location? Are there proposals for floodlighting on the site?	No floodlights are proposed however some external street lighting would be required. Appropriate lux levels to reflect the location of the site would be investigated by our client.	
30	a) Will it the site affect the present green network of the area? b) Will the site provide opportunities to enhance the present green network of the area?	a) Will the site affect features that currently provide for the movement of species and/or people e.g. woodland, hedgerows, field margins, watercourses, coastlines, tree belts, greenspace? b) Will connectively of natural features or open space and paths used for public amenity be improved? Will existing fragmentation of habitats and open spaces be improved? Will species be enabled to move where at present there is an obstacle?	An appropriate provision of open space would be provided as part of the development of the site.	
31	Will the site provide opportunities for people to come into contact with and appreciate nature/natural environments?	Is the site close to (within 1.5km) an opportunity to come into contact with nature/natural environments e.g. Local Nature Reserves, local greenspace, green networks? Are there proposals which will increase opportunities to come into contact with nature/natural environments?	Development of site will result in a contribution towards the provision of the Inshes District Park, as per the adopted Development Brief for the area.	

32	<p>a) Will the site affect any core paths or right of way?</p> <p>b) Will the site affect any other existing paths or outdoor access opportunities?</p> <p>c) Will the allocation provide new access opportunities within the site and linking to the path network beyond the site?</p>	<p>a) Is a diversion of a core path or right of way required? Will there be any impact on the usability of a core path or right of way?</p> <p>b) Will it affect an existing path in the Highland Path Record? Will it provide additional access opportunities or adversely affect access opportunities afforded by the Land Reform (Scotland) Act 2003?</p> <p>c) Will new paths be created within and beyond the site? Will any existing paths be improved e.g. to increase accessibility to a wider range of users? Will the site help to realise priorities identified in the Council's outdoor access strategy or aspirational paths identified in the core path plans?</p>	<p>No known Core Paths of Public Rights of Way would be affected by the proposals.</p> <p>We consider the site to be complementary to the proposals for pathways and footpaths within the Inshes District Park.</p>	
33	Will the site have an impact on the geodiversity of the area?	Are you aware if the site lies within or adjacent to an un-notified Geological Conservation Review site or Local Geodiversity Site? (or other site with geodiversity value e.g. distinctive landforms, areas with natural processes, rock exposures for study?)	It is not considered that the site has any geodiversity value.	
34	Will soil quality and capability of the site be adversely affected?	Will the site result in a loss of soil due to development or removal of good quality soil from the site? Is the site on land identified as Prime Quality Agricultural Land?	It is not considered that the quality of the soil will be adversely affected.	
35	Is the site on peatland?	Is the site within or functionally connected to an area of peatland? Would the allocation involve the disturbance of peat? If yes, how would impacts on peatland be avoided or minimised? Would any tree felling be required?	N/A	
36	Will the site have any affect on the viability of a crofting unit?	Does the site represent a significant loss of good quality inbye crofting land or common grazing land?	The site does not include any existing croft land.	

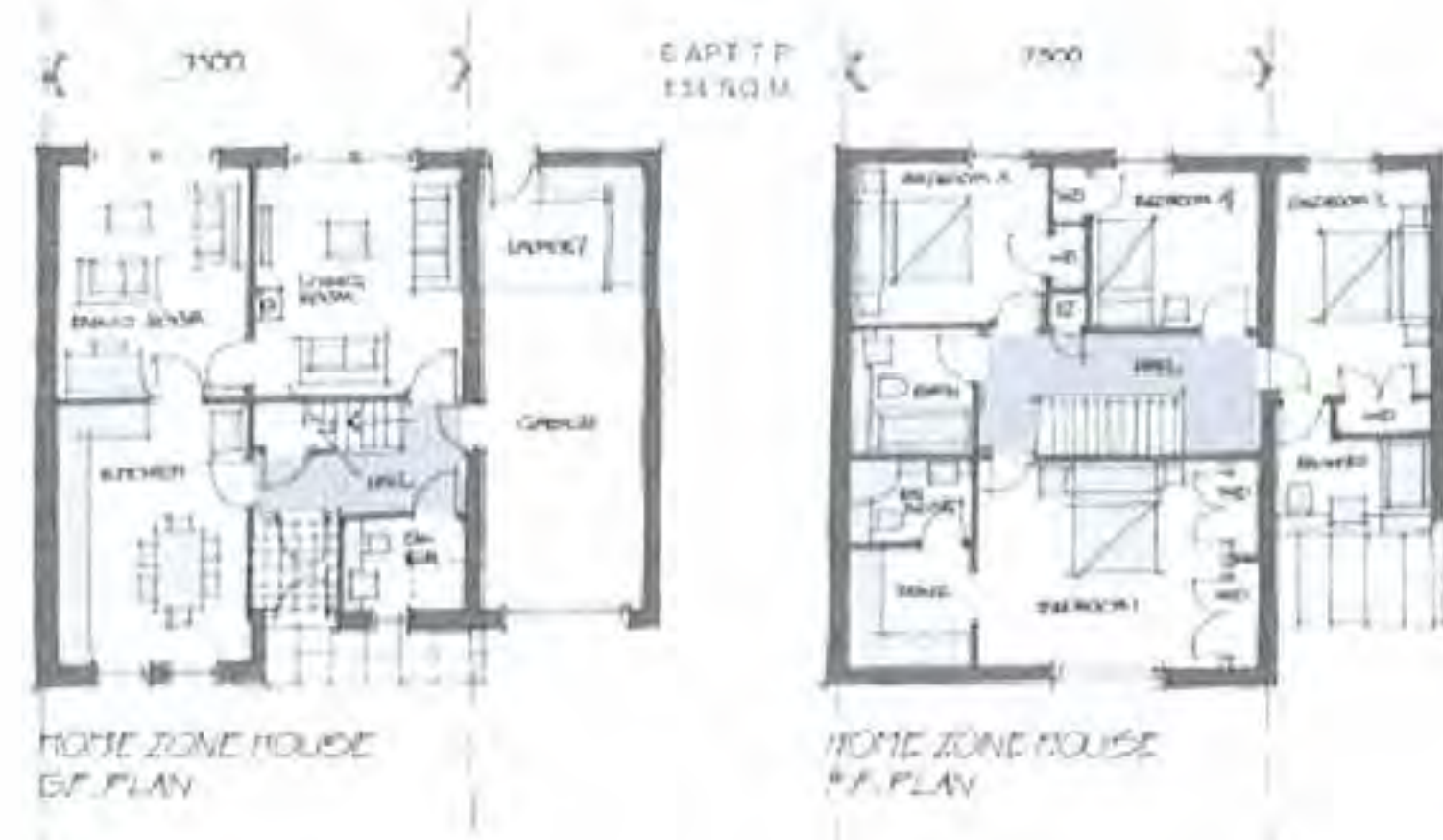
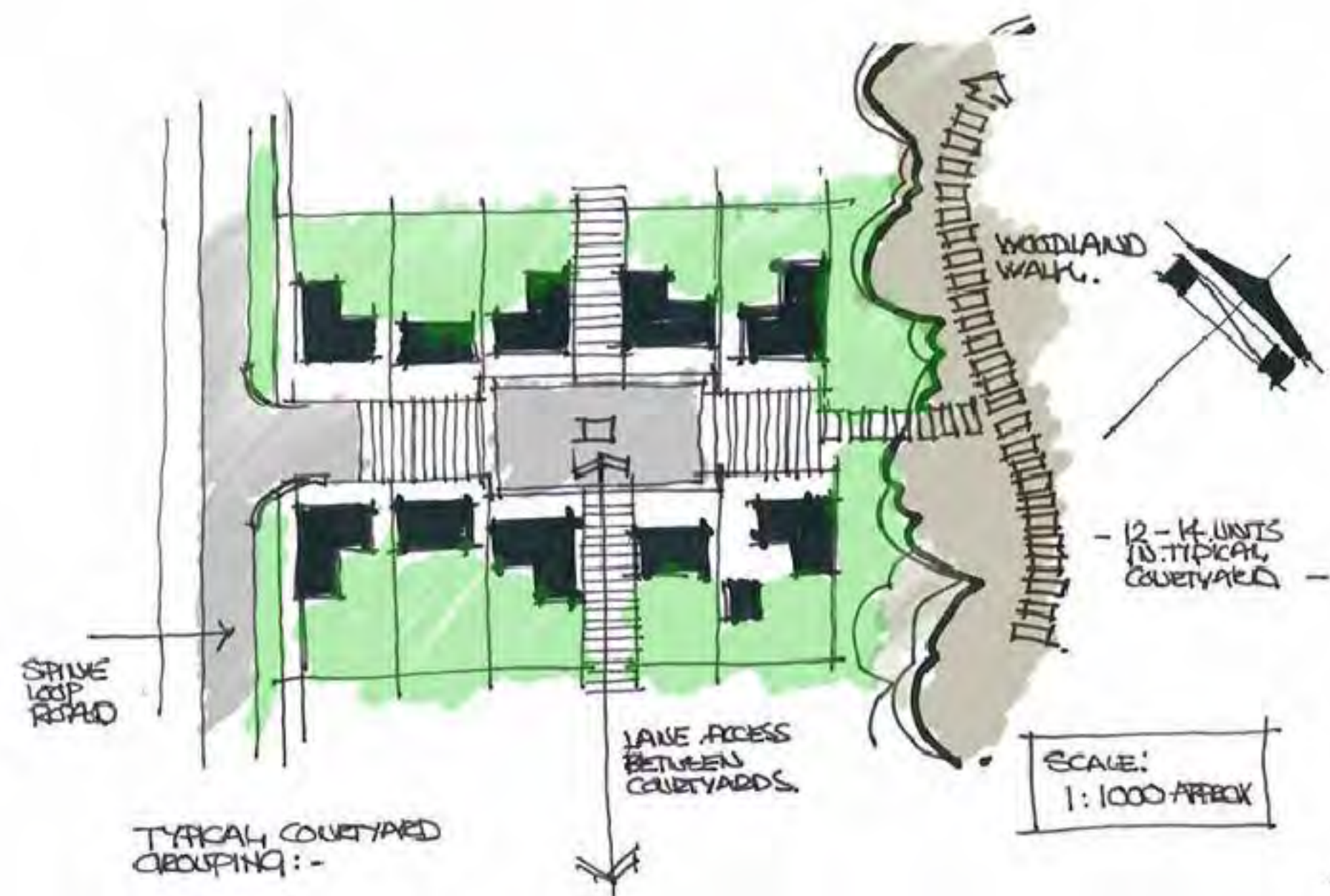
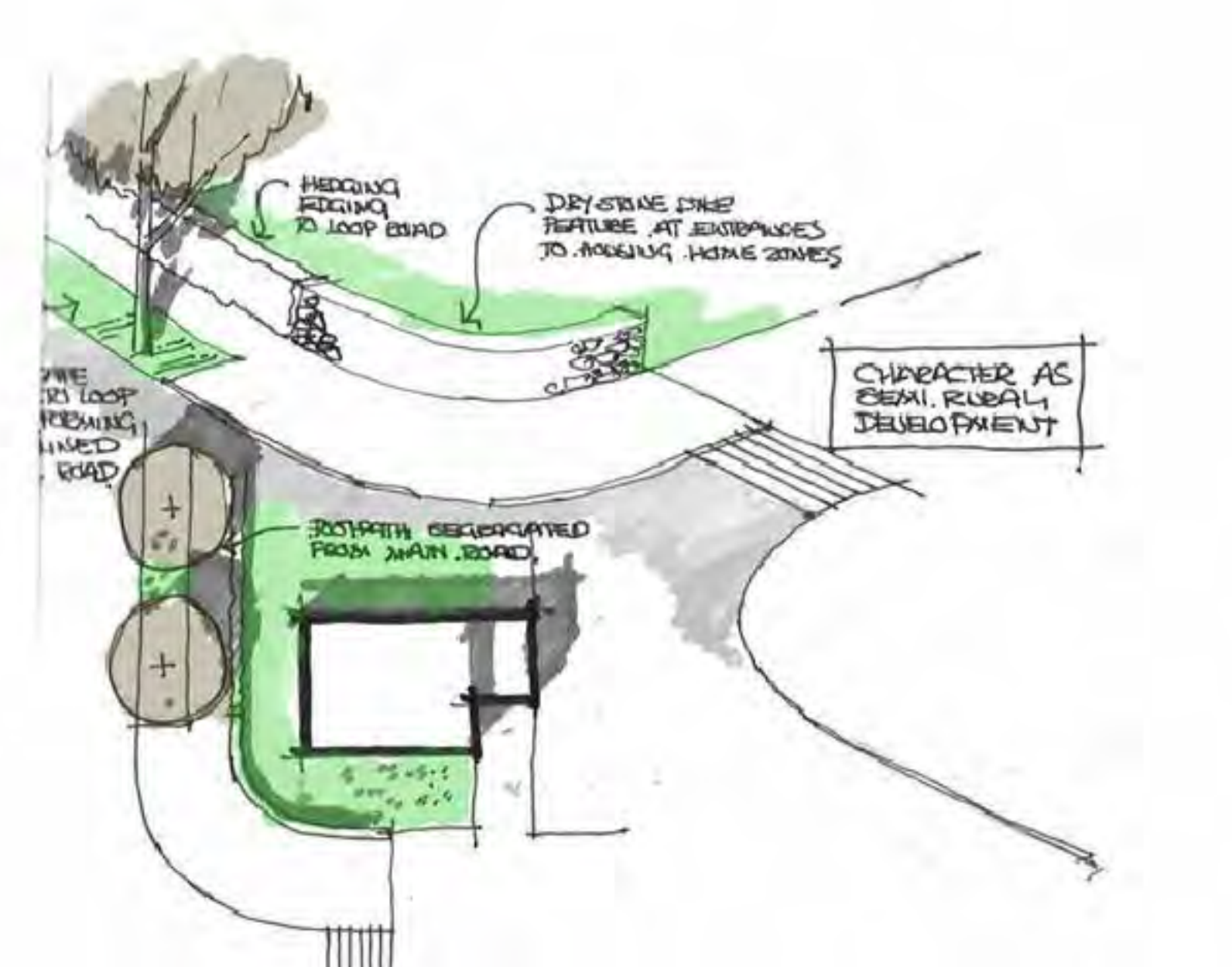


CONCEPT LAYOUT

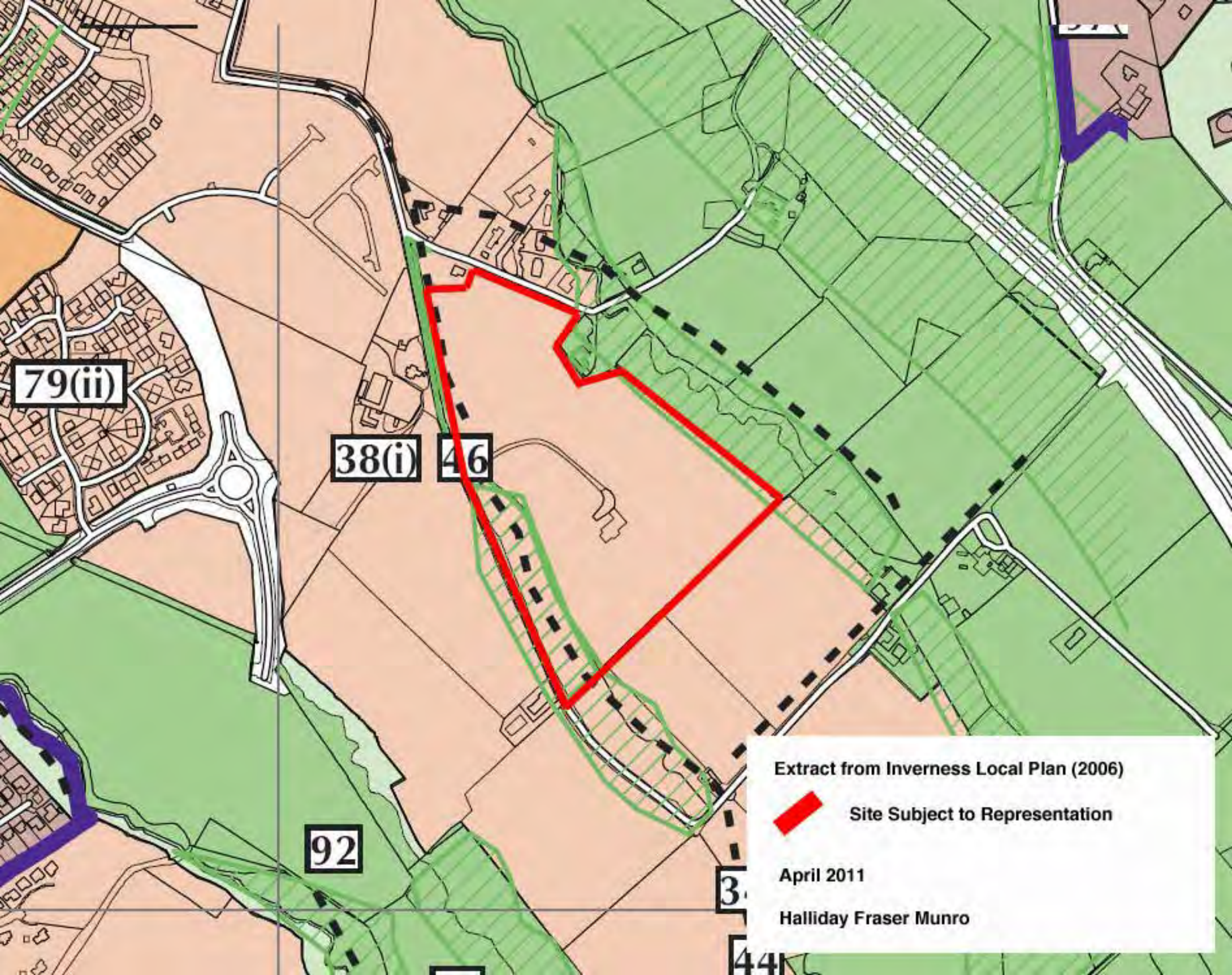
AFFORDABLE:
 20 NO. 3 BED 2 STOREY TERRACED UNITS
 14 NO. 2 BED 2 STOREY TERRACED UNITS

MAINSTREAM
 9 NO. INDIVIDUAL PLOTS FOR 1/2 STOREY 140 SQ.M. HOMES
 77 NO. 3/4-BED 2 STOREY LINKED / SEMIDETACHED HOMES

TOTAL 120 UNITS PLUS EXISTING BUILDING RETAINED



**PROPOSED HOUSING DEVELOPMENT
 WESTER INCHES INVERNESS
 FOR R F MORE (PROPERTIES) LTD**




79(ii)

38(i)

46

92

Extract from Inverness Local Plan (2006)

 Site Subject to Representation

April 2011

Halliday Fraser Munro