



HIGHLANDS AND ISLANDS BRANCH OF THE SCOTTISH GREEN PARTY

To: IMFLDP *Call for Sites*
Director of Planning and Development
Glenurquhart Road
Inverness
IV3 5NX

19 Admiral's View
Westhill
Inverness IV2 5GW

30 May 2011

LETTER BY EMAIL ONLY

Dear Director

INNER MORAY FIRTH LOCAL DEVELOPMENT PLAN-CALL FOR SITES EAST INVERNESS

Thank you for the opportunity to respond to this consultation. I apologise for the delay in our submitting this response. I hope that it will still be possible for our views to be taken into account. Our response comprises the contents of this letter, as well as the attached separately-completed form.

We request that the East Inverness area – essentially the mainly open areas numbered 1-4 on Map 6 (and proposed for development - though excluding Beechwood) in The Highland Council's 'Highland-wide Development Plan (Sept.2010) – to either remain as agricultural land, or if that is unlikely to happen, for it to be designated as open space. More specifically, we would like to see the area become a combination of:

- Parkland
- Sports pitches
- Children's playgrounds plus youth cafe
- Allotments
- An arboretum, linking Culloden Wood, Smithton Wood and the new UHI (green) complex at Beechwood
- Forest gardens
- Organic small-holdings
- Off-road cycling tracks
- Skate-boarding circuits

We believe there is a strong case for such open space designation:

Lack of large-scale parkland: A round 12,500 people live in the immediate East Inverness area, in Balloch, Culloden, Smithton, Resaurie and Cradlehall. Many more live nearby, in Ardersier, Cawdor and Croy. And though there is the almost-adjacent magnificent Culloden Wood, decent-sized parks and playgrounds in the East Inverness area itself are few and far between, particularly when compared to the excellence of Whin Park.

Tourist attraction: an open space on the lines we propose would be a welcome draw to visitors to Inverness, particularly if it were directly linked to the Floral Hall (a link which could usefully help publicise the Floral Hall).

Allotments: the provision of allotments in East Inverness – of which there are none at the moment – would be hugely popular, as evidenced by the enthusiastic take-up of allotments at Hawthorne Drive, and the long-standing call for a site in Cromarty.

Beechwood: The open space would provide students and staff at the UHI, and particularly the Scottish Agricultural College with an excellent ‘next door’ facility to work on and practise their nature/agricultural-related studies.

Climate Change: given the comparatively large concentration of population staying in East Inverness, the provision of open space with the above-listed facilities would offer them amenities which (for most) would be within easy walking distance of their homes. Such proximity would obviate the need to travel by car to similar facilities further afield.

We also see no case for the three new strategic roads proposed for East Inverness in the HwDP.

I therefore hope The Highland Council will designate this area as open space in the Inner Moray Firth Local Development Plan, and that measures be enacted to arrange for the above-listed facilities to be realised.

My apologies again for the delay in submitting these comments to you.

Yours sincerely

Neil Hornsby

Highlands and Islands Branch of the Scottish Green Party

INNER MORAY FIRTH • Linne Mhoireibh A-staigh

Call for Sites • Gairm airson Làraich



Where should future building
go and which areas should be
protected?

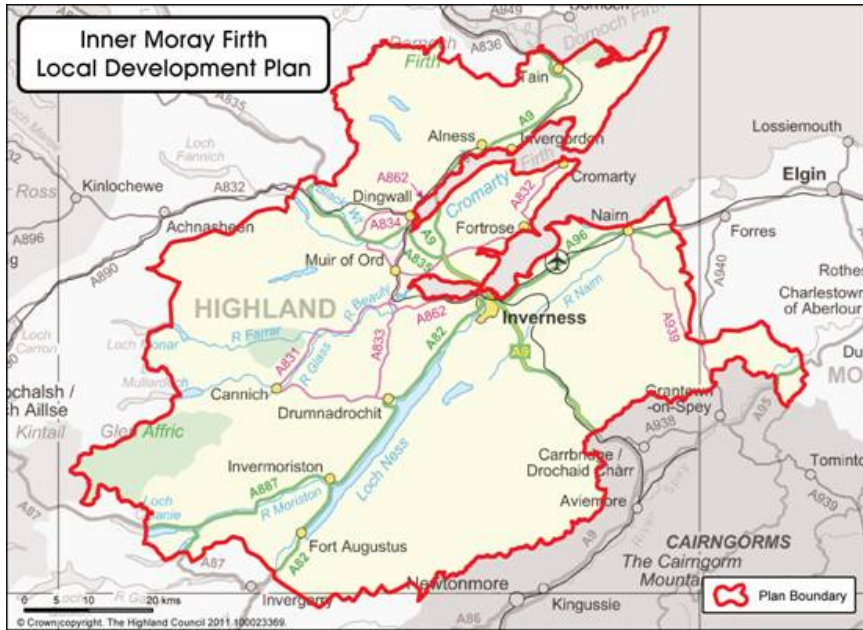


January 2011

Faoilleach 2011

Purpose

We are seeking your **suggestions on which land, in the next 10 years, should be built on and which areas should be protected across the Inner Moray Firth (as shown on the map below).**



Who Should Respond to the “Call for Sites”?

Anyone that in the next 10 years may wish to:

- promote a building project for any kind of development (we are particularly inviting larger scale proposals - e.g. 10 or more houses), and/or;
- safeguard an area of cherished public open space from building.

Easy Read Guide

This document is written for the general public. *Landowners, developers, agents and those interested in the complexities of the development process should also read the technical information on page 3 and further material available via the Council’s web-site www.highland.gov.uk.*

Why Is It Important to Make Suggestions?

This *Call for Sites* is the first step in producing a document called the Inner Moray Firth Local Development Plan (the *Plan*). This *Plan* and other Highland local development plans are important because they tell people where the Council is likely to support planning applications and where it is not. You may have already heard about the Highland wide Local Development Plan. This provides the “bigger picture” on development across Highland. The *Plan* will provide the local detail. These documents therefore affect the use and value of land and property. They are also a factor in public investment decisions - for example - new sewers, new schools and new bus routes will follow the location of new development.

How do I Submit My Suggestions?

Please write down your ideas and send them to us - do this by filling in the *Site Forms* for each parcel of land you have a suggestion for.

How do I Fill in the *Site Forms*?

We need as much information as possible to decide whether your suggestions should be included in the Council’s *Plan*. The better the reasons for the site’s inclusion then the more chance it will be included.

Please:

- use separate *Site Forms* for each site suggested;
- draw the boundary of the site you're suggesting on a map and attach this to the *Site Forms* (try and use a detailed Ordnance Survey base map if at all possible (these can be purchased from <http://maps.blackwell.co.uk/> or if your site is within or close to a large village or town then photocopy one of our existing local plan maps (available via: <http://www.highland.gov.uk/yourenvironment/planning/developmentplans/localplans/> and add your suggestion) although a hand drawn map will suffice);
- note we can't keep your suggestion confidential because this is a public process;
- note however we will redact (exclude or blackout) all private phone numbers, e-mail addresses and signatures from whatever you send in before it can be seen by others;
- provide full contact information so we can come back to you if we need to clarify anything.

When & Where Should I Submit my Suggestions?

Please send your completed *Site Forms* and maps to be received by 29th April 2011 to:

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

Or preferably by e-mail to:
imfldp@highland.gov.uk

What Happens After I've Submitted My Suggestions?

We will:

- let you know we have received your suggestion and then compare and assess it against others and information we have collected (about the area's building needs and constraints to building);
- then produce the first draft of the *Plan* called a *Main Issues Report* which will contain options for sites to be built on or safeguarded from building - you can then see whether your ideas have been included or not;
- invite views on these site options;
- then decide which of the options to keep;
- invite objections to any of the sites the Council has decided to keep - you can object at this point if your site suggestion has not been included or kept;
- refer objections to an independent person (a Scottish Government appointed *Reporter*) for him/her to test the merits of the views of objectors and the Council about each contested site, and;
- produce the finished *Plan* including the changes recommended by the *Reporter*.

As you can see the current "*Call for Sites*" is only the start of a relatively long process. You will not get a final answer to your suggestion for 2-3 years.

Why Does it Take so Long to Decide Where to Build?

This is because the *Plan* is a statutory document. As such, it involves several chances for anyone with an interest in the environment around us to have their say whether for or against. Also to ensure

fairness, objections are heard and decided upon by a person independent of the Council and objectors.

What Should I do if I Want a Quicker Answer to My Building Suggestion?

You should consider lodging a planning application. However, large scale building proposals that don't have any support within the Council's existing *Plan* have less chance of obtaining planning permission. There is no Council fee to submit your suggestions on the *Plan* so responding to the "Call for Sites" is particularly suitable for those landowners looking at development potential in the longer term but who do not want to incur the cost and risk of a planning application.

Site Forms

Fill in and return one of the forms below for each site suggestion (remember to append a map for each and continue on separate sheet(s) if necessary). **The forms are available on the Council's web-site and can be e-mailed to anyone who requests them by phoning the number below.**

Queries

If you would like further information or have any other queries please contact Tim Stott on 01463 702265 or e-mail imfldp@highland.gov.uk

Further Information

The Council's web-site www.highland.gov.uk (search for "imfldp") will provide comprehensive information on the *Plan* throughout its progress.

This "Call for Sites" is the first step in the Council's production of a detailed local development plan for the Inner Moray Firth. The area covered by the Plan stretches from Tain round to Nairn and as far south as Fort Augustus and the Cairngorms National Park boundary. The western boundary encloses Garve and Strathconon.

For larger and more complex development proposals requiring the submission of more information, landowners, developers and/or agents may wish to copy and expand the forms which are available as Word or Excel templates on the Council's web-site.

It is proposed that the *Plan* will have a streamlined format and will therefore focus mainly on larger development proposals and areas to be safeguarded in the main towns and villages in the area. We welcome other site suggestions in other smaller places but these ideas may be redirected to our Area Offices so they can offer advice prior to the submission of any planning application.

Landowners, developers and/or agents do not need to suggest sites which are already allocated in an adopted local plan unless they wish to suggest a material change to the nature of that allocation - e.g. they wish to increase the site's capacity, amend the boundary, change the use or uses of the site or reduce listed developer requirements. The *Plan* will carry forward the principles and fill in the detail of the Highland wide Local Development Plan (as approved post Examination).

Site Forms

YOUR DETAILS	
Your Name (and organisation if applicable)	Neil Hornsby Highlands and Islands Branch of the Scottish Green Party
Your Address / Contact Details	19 Admiral's View
	Westhill
	Inverness
	IV2 5GW
Landowner's Name (if known / applicable)	Not known
Agent (if applicable)	Not known
Agent's Address / Contact Details (if applicable)	Not known

DETAILS OF SITE SUGGESTED	
Site Address	East Inverness
Site/Local Name (if different from above)	In effect, the whole coloured area numbered 1-4 (though excluding the Beechwood development) on map 6/para 11.5 of the Highland Council's draft Highland-wide Development Plan (Set.2010)
Site Size (hectares)	Approx two square kilometres/200 hectares
Grid Reference (if known)	Principally NH 7045 plus parts of NH7046 and NH7146
Proposed Use (e.g. housing, affordable housing, employment, retail, waste, gypsy traveller, utility,	Open Space – either to remain as agricultural land or become parkland including. arboretum, forest gardens, allotments, children's playground etc

community, retained public open space)	PLEASE ALSO SEE ATTACHED COVERING LETTER WHICH PROVIDES A MORE COMPERHENSIVE CASE FOR OUR PROPOSALS
Proposed Non Housing Floorspace / Number of Housing Units (if known/applicable)	
Map	(please attach a map of the site ideally on an Ordnance Survey base)

If you wish to suggest a site that should <u>not</u> 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?	Not applicable at the moment as the land is agricultural. But if it were to become open space (see opposite) then it could be heavily used by the public for recreational and other uses (including for allotments).
What makes the site more special than other areas in the village/town?	Despite the immediate area's large population (around 12,500) decent-sized parks and playgrounds in East Inverness e are few and far between, particularly when compared to the excellence of Whin Park.
Does the site have attractive or rare features such as mature trees, historical significance or protected wildlife?	Yes. Either retaining it as agricultural land or developing it as open space provides a wildlife corridor, to connect Culloden and Smithton Woods with Beechwood and beyond. This (opportunity) would be lost of the site were to be built on.

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.

drainage, surface water and water supply arrangements)	
FORM CONTINUES BELOW	

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	

REASONS FOR YOUR DEVELOPMENT SITE SUGGESTION	
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?)	
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?)	
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?)	
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?)	
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>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>	

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?		
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?		
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?		
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?		
5	Is there scope for road	Will development incorporate on-site traffic		

	safety measures as part of the development of the site?	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		
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?		
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?		
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?		
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?		
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?		

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?		
12	Will the site affect a conservation area?	Is the site inside or likely to affect the character of a confirmed 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?		
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"?		
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?		
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?		
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?		
18	a) Will the site affect any protected species? b) Will the site affect any other important species for the natural heritage?	a) Will the site affect any European Protected Species, Badgers and species (birds, animals and plants) protected under the Wildlife and 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?		
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)		
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?		
22	Is there a watercourse, loch or sea within or adjacent to the site? If yes, how will the water	Will there be any culverting, diversion or channelling of existing watercourses?		

	environment be protected from development?			
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?		
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?		
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?		
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.		
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?		
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.		
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?		
30	a) Will it the site affect 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 the site provide opportunities to enhance the present green network of the area?	b) Will connectivity 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?		
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?		
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>		
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?)		

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?		
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?		
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?		