

Issue 1		Completing the Unconstrained City Expansion Areas	
Development plan reference:		Policy 1 (Para 9.5, Page 23)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number)			
Scottish Natural Heritage (SNH) (118), GVA Grimley for Asda (165), Mrs Annie Stewart (172), CB Richard Ellis for Grosvenor Eastgate Unit Trust (193), Pritchett Planning for Scottish Widows Investment Partnership Property Trust (SWIP) (228), Homes for Scotland (293), Crofters Commission (271), Scottish Environment Protection Agency (SEPA) (326), Scottish Association for Public Transport (446), M Gilvray (453)			
Provision of the development plan to which the issue relates:		Completing the Unconstrained City Expansion Areas	
Councils summary of the representation(s):			
<u>CB Richard Ellis Ltd for Grosvenor Eastgate Unit Trust (193)</u>			
<ul style="list-style-type: none">• Full support for the redevelopment of these locations. The city centre is in need of redevelopment to ensure that it remains viable as the regional centre of retailing. Redevelopment of the Longman Core will assist in this given its proximity to the city centre. Access must be improved (193)• Supportive of the contents of the plan and its associated policies - welcome the fact that the plan continues to support the city centre and redevelopment of sites within and around the city centre, and continues to seek an increase in the population of the city in the local development plan life time (193)• Accept that the east of the city receives significant support in terms of future development however it is also recognised that the existing expansion areas in and around the city/city centre are to receive continued attention prior to any focus being places on the east of the city (193)• Support 2nd bullet point of Inner Moray Firth Spatial Strategy in terms of the growing city as it seeks to maintain the city centre as the focus for services/retail provision. (193)• Support proposed diversification of the economy as identified on page 18. The city economy will benefit greatly from diversification and is perfectly suited to do so. This will assist in improving the vitality and viability of the city centre (193)			
<u>Pritchett Planning for Scottish Widows Investment (228)</u>			
<ul style="list-style-type: none">• Section 9 of the plan indicates that the Council is seeking to consolidate the city and with the focus for growth related to a build out of the existing expansion areas around the city to 2016. However, the policies which follow this statement do not give priority to such development as policy 1 in particular only states that 'The council will			

support the ongoing development of the expansion areas'. If the council is genuinely prioritising the completion of the unconstrained city expansion areas the plan should be adjusted throughout to make it clear that for all forms of development in the areas identified on figure 4 should take priority over other more peripheral and constrained locations. In those sections which refer to other more peripheral areas the policies relating to development there should be clarified to make it clear that development is not supported in advance of the consolidation areas. (228)

M Gilvray (453)

- Supports aim to consolidate and complete city expansion first. It would be useful to have some indication of which areas are already committed and therefore new standards cannot be applied (453)

Mrs Annie Stewart (172)

- This needs more focus on delivering the development of quality, retail, commercial and cultural opportunities in the city centre. The town centre facilities must match the expectations of the increased residential and visiting population (172)

GVA Grimley for Asda (165)

- On behalf of our clients Asda Stores Ltd we support the continued allocation of our client's site at Slackbuie for retail development as part of the District Centre serving that area. Our client is planning to build a superstore to serve the needs of the local area with outline permission being granted earlier this year. (165)

Homes for Scotland (293)

- Believe that to be able to meet the Council's housing targets, sites in the right locations should be made available through the Local Development Plan.
- Housing targets are reliant upon a relatively small number of large schemes, many of which still require significant work and investment before they can be delivered. To avoid any potential shortfall in the housing supply during the Local Development Plan period a mechanism should be introduced which would allow additional sites to be brought forward for release which can contribute to the short term land supply.
- There are examples of large scale allocations within the proposed plan that are unlikely to overcome their infrastructure constraints in the near future. Experience across Scotland has shown that sites of such scale are invariably non-effective or at least delayed given the complicated nature of delivery of key infrastructure.

- Homes for Scotland has been challenging Councils across Scotland to provide for additional effective sites that offer range and choice which can augment development strategies. This should be undertaken through the plan preparation stage. The Council is encouraged to identify a plentiful range of complimentary sites, that accord with the spatial strategy, to help and support investment decisions. (293)

Scottish Natural Heritage (118)

- References to the Inverness Local Plan in this policy and other policies in the plan mean that the relevant policies of the Inverness Local Plan should be subject to Habitats Regulations Appraisal of this plan. (118)

Scottish Association for Public Transport (446)

- Agree that development should be focused in Inverness to avoid ribbon development along the A96 corridor.

SEPA (326)

- Section 9, Consolidating the City, Section 10, A96 Corridor, Section 11, East Inverness SEPA notes an inconsistency in the level of detail provided in the various developer requirements outlined in the policies identified in these sections. This lack of consistency will create difficulties for the planning authority and applicants as it could be taken to suggest that the Council would apply varying levels of rigour in assessing proposals for these development sites. We would expect the development briefs for all the allocations identified to be consistent in the requirement for sites to be assessed with respect to Flood Risk and River Basin Management Planning. However, at present some allocations refer to the need for Flood Risk Assessment and others, where we are aware of a need for flood risk assessment, do not refer to this need. A developer would therefore be led to believe that on those where Flood Risk Assessment is not specifically identified, there is no need for Flood Risk Assessment. Similarly, the requirement for connection to the public sewer, Sustainable Drainage Systems (SUDS) and the avoidance of engineering works in the water environment eg no culverting of watercourses should also be applied in a consistent manner. (326)
- support the **Ness Castle** allocation within this policy as it includes a developer requirement that any development proposals are subject to a flood risk assessment and that no development takes place in an area subsequently found to be within the functional floodplain as defined by Scottish Planning Policy. This is because, in addition to Holm Burn, other small watercourses have been identified within the allocations. (326)
- object to the **Culduthel / Slackbuie** allocation within the policy unless

the policy includes a developer requirement that any development proposals are subject to a flood risk assessment which would include further information about the various watercourses within the allocation. (326)

- object to the **Inshes / Milton of Leys** allocation unless the policy includes a developer requirement that any development proposals are subject to a flood risk assessment before any application is determined and that no development takes place in an area subsequently found to be within the functional floodplain as defined by Scottish Planning Policy. Further details on specific concerns expressed are contained within SEPA's submission. (326)

Crofters Commission (271)

- Draw attention to the Knocknagael Stud Farm. The Stud is located at the two farm units of Knocknagael and Balrobert lying to the south of Inverness close to the Ness Castle and Culduthel Slackbuie development areas. The modernisation of the stud is essential to the future continuation of the Crofting Cattle Improvement Scheme and will provide Inverness and the crofting areas with a streamlined, modern bull stud facility for the future providing a safe environment for the housing of the bulls, whilst delivering best value for public money.
- The modernisation project will consider and take into account both national policy objectives and the range of objectives identified in the Highland Wide Development Plan and actively input into the Inverness City Vision and the Inner Moray Firth Local Plan. Consideration will be given to the range of feasible activities which could be within the keeping of the Vision and Local Plan and acceptable use of assets to deliver best value of public money.
- Accordingly, we will hold early discussions with Highland Council planners to deliver the best outcome for all parties

Modifications sought by those submitting representations:

- An additional paragraph should be included within section 9 to state that flexibility will be given to allow the release of alternative housing sites to make up the shortfall in housing numbers in the event that individual sites fail to deliver during the proposed delivery period. (293)
- Recognition of potential for diversification at Knocknagael (assumed) (271)
- Adjustment of plan to make it clear that for all forms of development in Figure 4 should take priority over other more peripheral and constrained locations.
- Include developer requirement that any development proposals are subject to a flood risk assessment before any application is determined and that no development takes place in an area subsequently found to be within the functional floodplain as defined by Scottish Planning Policy (326).

Summary of responses (including reasons) by Planning Authority:

Lack of alternative land supply (293)

- Matters relating to the Inverness city land supply are dealt with in more detail in the Schedule 4 relating to Issue 86. The Council believes that there is sufficient land supply (as identified in the Council's [Housing Land Audit](#)) which is capable of meeting the needs in the short to medium term. In particular the areas covered by this policy are free from significant constraints and are being actively developed or marketed at the present time. Homes for Scotland have not provided the Council with evidence of which sites they feel are not capable of being delivered in the short term, and it is difficult to recommend a mechanism such as they suggest to the Reporter without this information. The Inner Moray Firth Local Development Plan will also allow any short term supply difficulties to be picked up in due course.

Phasing of Development (228, 446)

- The Council strategy is to ensure the consolidation of the city of Inverness with a focus on growth in the existing expansion areas around the city in the period to 2016. The Plan does this by promoting the sites in Figure 4, but also by managing the phasing of the build out of more peripheral areas. This builds in a recognition of the developer interests in all parts of the city and ensures a range of sites are available, albeit with the balance given towards the city expansion areas. It is not considered necessary to change this approach.

Knocknagael (271)

- It is not considered appropriate that detailed provisions for the modernisation project at Knocknagael are included within the Highland wide Local Development Plan. The site is currently identified as Green Wedge in the adopted [Inverness Local Plan](#) and it is appropriate that any change to that position is taken forward in the context of the Inner Moray Firth Local Development Plan. The Council would be pleased to have discussions with the Crofters Commission on that basis.

Natural Heritage (118)

- The Council is progressing the Plan's Habitats Regulations Appraisal (HRA) in conjunction with SNH. The purpose of Policy 1 is to highlight the role that the existing expansion areas as identified in the adopted Inverness Local Plan will play in delivering an effective land supply. The intention is not to revisit the principle of development on these sites. As a result the sites will be screened in respect of the HRA, and appropriate additions, if required, suggested to the Reporter in advance of the Examination period.

SEPA (326)

- The Council accepts that there are different levels of detail provided in the various developer requirements outlined in the policies identified in the sections referred to. The allocations referred to in Policy 1 are covered by policies in the existing adopted Inverness Local Plan, and as such the same level of detail is not required, as the majority of the areas covered by Policy 1 already benefit from planning permission or development briefs.
- The Council would assert that a specific developer requirement is not appropriate to allocations (Inshes/Milton of Leys and Culduthel/Slackbuie) that roll forward the provisions of the approved development plan. In addition the majority of the areas covered by these allocations already benefit from planning permission.
- The Plan's general Policy 65 Flood Risk, already sets out adequate policy coverage. It includes the requirement for a Scottish Planning Policy compliant flood risk assessment for developments within any 1 in 200 year flood risk area.

Any further plan changes commended by the council

None.

Reporter's conclusions:**Reporter's recommendations:**