

Issue 20	Croy Expansion	
Development plan reference:	Policy 20 (Para 15.4, Page 58)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number)		
Health and Safety Executive (HSE) (53), Mary Harrison (73), Mrs H Rask (92), Scottish Natural Heritage (SNH) (118), Mrs E Holland (153), Julian Walford (155), Croy Community Council (218), Michael Hutcheson & Alison Lowe (226), C Stafford (272), Scottish Wildlife Trust (285), JG Walford (300), Scottish Environment Protection Agency (SEPA) (326) J Alami-Merrouni (336), Mrs Rosemary Greenlaw (342), Alliance Planning for Church of Scotland General Trustees (345), Stuart & Faye Lingard (348), C MacKenzie (351), Ms Linda Stuart (363), Magda Utton (364), J Merrouni (397), EMAC Planning for Scotia Homes (456), Carol Walford (475), Charles Quinnell (503), A & M Baxter (511)		
Provision of the development plan to which the issue relates:	Expansion of Croy	
Councils summary of the representation(s):		
<p><u>Charles Quinnell (503)</u></p> <ul style="list-style-type: none"> • The village currently has some 260 houses. Scotia plan to increase that by around 100, phased over 10 years. This is too large scale for a village, and not in keeping with the character of the area. There are also concerns about the density of the development, which would bear more of a resemblance to suburbia than the countryside. (503) • Concerned that Scotia's proposals as seen, show an incompetence in terms of their infrastructure - particularly in reference to their suds pond. They plan to drain an area of bog through which the Croy Burn meanders, to incorporate this ground into their development. This is a crucial part of the system of the burn, and I am very concerned that their proposals will lead to increased flooding, and to pollution of Loch Flemington, recently restored after pollution. I would ask that this boggy area of ground is excluded from any development on environmental grounds. (503) • The traffic on the roads around Croy is already heavier than is sensible, with many of the roads themselves downright dangerous, and unsuited to the volume of traffic currently on them. The proposed development would only make that worse - particularly in light of other proposed expansion in Cawdor, Ardersier, Nairn and Inverness, plus the looming possibility of a new town at Torr na Greine. (503) • There is some confusion as to the status of a portion of the land that Scotia are seeking to build upon, as it appears to be differently designated in different plans. It is the wish of all the people in the village that I have spoken to, that this land (between Dalcroy Road and School Brae) is kept as green space, for amenity use. May I also add that the confusing labyrinth of conflicting plans pertaining to planning in 		

the Highlands at the moment serves only to frustrate the public about a subject that is highly important. The lack of clarity in the planning system is anti-democratic, and disenfranchises many who do not have the time or the skill to wade through a mire of paperwork calculated to render the public confused. (503)

- Believe that the proposed development is in contravention of the stated Council plan, which states that villages should not grow by more than 25% over 10 years. I am not anti-development per se, but would like to see the village remain a village as the currently very close-knit community would recognise a village. (503)
- Many in the village are unhappy with this proposal, and feel that their views have not been listened to by Scotia in various public meetings and presentations held in the village. Their representatives have come across as arrogant, high-handed, and have sought to bully the community. This has caused much anger. (503)
- Several neighbours are considering - or indeed in the process of - selling up and leaving Croy due to Scotia's proposals. I include myself - a young and active man - in their numbers. I chose to live in Croy because it is a small rural community. I grew up in such a community, and felt comfortable in Croy. I see no valid reason for this to be threatened in the way Scotia are proposing. Their development is driven purely by grandiose avarice, and not by their falsely stated wish to improve a village that they know very little about. In fact they are driving people away from a thriving community, and therefore damaging it, rather than improving it. (503)
- The presumption to "develop" on the scale proposed - not only in Croy but in the so-called A96 "Growth Corridor" on prime arable land, is profoundly ill conceived. Such land is at a premium in the Highlands. And as for a Growth Corridor, there's plenty growing in it as it is. Building on it would reduce that, not increase it. (503)

E Holland (153)

- The land allocations at Tornagrain and Mid Coull and the extension of the Croy settlement will lead to its boundary being in close proximity to that of Tornagrain. (153)
- The development of 40 houses was completed in Croy from 2006-2008 and is still being assimilated into the village. To commence further development in 2011 does seem precipitate; to add 1 00 houses in a ten year period is an increase of around 50%. The Council's own guideline is a 25% increase in ten years. Why this departure from the norm?
- Such an increase would overwhelm the community's resources including a community owned hall run by volunteers.

- The site identified on map 1 0 clearly occupies an area equivalent to more than half the size of the present built-up area. Part of it is formed by a steep incline dropping away from the B9006 and a boggy area where springs rise to source the Croy Bum. Even the Development Plan Manager admits that it is "undevelopable". Why has it been included?
- Road access to this site would be through the latest development on to a single track lane with passing places, or on to the Croy by-pass (where traffic travels at speed) just to the east of a dangerous blind bend.
- Bus services in the area are presently being curtailed.
- As to "Housing" I made clear earlier that I think "affordable housing" is a contradiction in terms and, whatever percentage is decided on, this development will be beyond the reach of many local working people.

J Alami-Merrouni (336)

- Extremely concerned about the proposals for Croy village. The 2008 Scotia development of 40 houses gave the village considerable growth however the proposals for 100 houses over the next 10 years are not in keeping with the village. The houses are crammed together making the density double that of the existing Scotia development. (336), (153)

Scottish Wildlife Trust (285)

- Green Networks and Open Spaces policies (75 & 76) should be linked with the Natural, Cultural and Built Heritage policy (58). Open spaces and Green Networks should be designed so that they are good for people and wildlife, safeguarded habitats should be linked to the green network to allow access. (285)

J Merrouni (397)

- Feels the scale of development is excessive (would like to keep Croy a small pretty village and is concerned about the cost of development to the Council (waste collection etc). Would like additional tree planting which would encourage wildlife (but does not understand the Green networks and open space requirements). There is a whispering stone off the B9006 in Croy. There have been sightings of badgers, hedgehogs and bats in the area, and is concerned that development will reduce the wildlife. Would like a definition for affordable. Concerned that there is nothing in Scotia's plans that will prevent further flooding and damage Loch Flemington. (397)

Mrs H Rask (92)

- Considers that 100 new houses in Croy environs in the next ten years should be a maximum. The heart of the community will be sustained by carefully planned and phased development which will not alienated or threaten existing residents by their size. Gradual expansion is desirable. Also has concern regarding ability of existing roads and infrastructure to cope with rapid increases in traffic volume particularly road from Croy to the airport roundabout. (92)

A & M Baxter (511)

- Is there a true need for the proposed level and type of development for the foreseeable future. (511)
- Raises concerns regarding the infrastructure for the area, with no investment from Transport Scotland, also concerns regarding the impact of high water table, flooding and SUDS. Concerns exist as to factoring agreements fro open space associated with development as evidenced by concerns at the recent Croy development. (511)

J Alami-Merrouni (336)

- Concern about the proposed SUDS pond and footpath in the area next to the school which is a very boggy area and totally inappropriate & great concern over flooding in this area and the overflow which leads into Loch Flemington (336)
- Lack of green open space in between the proposed residential houses which does not follow the character of the village (336)
- Lack of demand for new houses given current housing market situation (336)
- Concern regarding the increase in traffic that will be generated i.e. most are likely to have 2 cars. These roads, namely the Croy airport single track road and B9006 (Culloden Road) are all subject to accidents. Developing this area would cause further stress on public services i.e waste collection/ road gritting/ emergency services. (336)

Mrs Rosemary Greenlaw (342), A & M Baxter (511)

- The proposal from Scotia is alarming, understand the need to zone for housing development in this area, however:
 - The area of land between Dalcroy Road and the present development at Ardgowan/ School Brae is not included in the expansion area shown on the map on your letter. Can you confirm this is the case, and give an assurance that this land will not be approved for building, either under Scotia Homes proposals or in any future planning applications? In other words can you confirm that development will only be approved in the area on the map?
 - There is no indication of the level and/or density of development likely to meet with planning approval. Can we be assured that in a small rural

village such as Croy, only sensitive and appropriate developments would be approved? Under the Inverness Local Plan, villages such as Croy were to be limited to 25% growth every ten years. Does the same restriction apply under the proposed Local Development Plan, proposals appear to be around 44%? (342, 511)

C MacKenzie (351)

- Request to keep flats and industrial buildings away from boundary area at end of Dalcroy Road due to end gardens for retirement houses. Keen also to maintain Croy's village feel (351)

Stuart & Faye Lingard (348)

- Question the need for this level of development in the context of Market demand and wider economic constraints (348).

Magda Utton(364)

- Acres of green belt have already disappeared because of the demand for housing: where are all the people coming from and where will the industry come from to support this number (364).

Health and Safety Executive (53)

- This area may have either hazardous installations and/or pipelines whose consultation distances may encroach on development areas. (53)

Ms Linda Stuart (363)

- Concern that 101 houses over next 10 years is excessive. Existing Local Plan limit of 25% would equate to no more than 58 houses. (363)
- Creation of a pond within bog area may lead to flooding and if mismanaged, may have adverse effects on Loch Flemington. Already flooding events to rear of Dalcroy Road. (363)
- Do not wish to see further high density development like that on Ardroy Road as it causes parking problems and problems with bin lorries etc. (363)
- Question the requirement for additional shops within Croy. Doctors surgery required instead. Privacy concerns as shops & parking will be directly behind my house and will attract youngsters. Should be screening between Dalcroy Road and new development (363)
- Roads into Croy require upgrading before any additional houses - airport road, Manse Brae road - and access to/from B9006 which has road safety implications. (363)

- Objects to proposed path down the side of 27 Dalcroy Road which would be adjacent to where car is parked and thus likely to attract vandals. Would also result in loss of green space and would require additional car parking spaces at Dalcroy Road. (363)
- The existing sewage treatment works would not be able to cope with 101 new houses and so would need upgrading. (363)

Magda Utton (364)

- Would like Croy to remain small village community and not expand into a large village development. (363). Croy doesn't need any more expansion and we already have our fair share of council houses (364). The proposed housing development is far denser than some of the settlements that exist already (364). This would ruin the whole identity of Croy (364).

A & M Baxter (511)

- I understand the nearby proposals at Tornagrain are for some 800 houses in the next 10 years and would take pressure away from smaller settlements such as Croy, would question the need for large allocation therefore at Croy. (511)

Croy Community Council (218)

- Concerns over sustainability of proposals given the travel to work patterns of future residents. Local and strategic road upgrades should be put in place as should rail improvements between Inverness and Aberdeen.
- There is no indication that the general infrastructure of the region (medical, education, social work, police, care for the elderly etc) is going to keep pace with the quantity of housebuilding proposed.
- Feel that in the HWLDP there has not been clear justification for the large number of houses proposed. The whole concept is speculative.
- There is a widespread and long adopted Council Planning policy of not permitting more than a 25% increase in community size within a given 10 year period. This seems to us to be reasonable as it allows integration in the community. We object to the phasing strategy proposed for Croy as there is every indication at present that the phasing strategy proposed is far in excess of this. The majority of the community has expressed concern at the number of houses in Highland Council Phasing proposal. If the Highland Council adhered to the 25% figure we are led to believe that this would match very closely to the capacity of the Croy sewage works.

- There has been no great consideration of the expansion boundaries for both Sunnyside and Croy. For Croy, we feel that the boundary encompasses land that is unsuitable for development on part of the site. We feel that HC planning department should ascertain the views of the local community before putting boundaries on plans. There are several other areas of land within the boundary that are still available for development.

Croy Community Council - Note of meeting on 08.11.10 (218)

- Drainage is a major issue, SEPA & Council's flood team need to be actively engaged in the determination of the planning application
- Part of the site is undevelopable, the whole site should not be used to calculate density levels
- Density levels too high - not in keeping with Croy
- Plot sizes are too small to allow people the opportunity for effective gardens
- HNDA - perception is there is not the level of demand the Council are adopting, particularly taking into account the number of houses for sale in the immediate area
- Plot ratios are too small
- Roads requirements seem to be different for single houses and for developer led proposals re turning ability
- Critics of pre-application consultation - key themes of drainage, wildlife and density have not been taken on board
- Traffic impacts - both in terms of B9006 but also Mid Coul Road/School Brae. Safety must be a paramount consideration.
- Impacts on Loch Flemington - risks to the status of the waterbody, and impact on wildlife
- Concern over need, particularly in the context of approval at East Inverness, and proposals at Tornagrain
- Local Plan context
- Other general concerns raised re rate of development, flooding, accident rates on surrounding roads, disregard for pre-application consultation, education capacity in Croy for primary and nursery users

Michael Hutcheson & Alison Lowe (226)

- Part of the site is not suitable for development and object to that part of the expansion site being included. It would appear that the Council has not assessed the suitability of the site. (226)
- For the purposes of delineating expansion sites, the HwLDP is the document to deal with principles of all proposals to come forward and look at the overall picture presented by these proposals. The site at Home Farm should also be included in the HwLDP. (226)
- Do not support the phasing strategy in this policy; it is contrary to Council policy, statements and recommendations, it represents overdevelopment and has not been subject to community consultation.

It is far in excess of the 25% restriction on growth policy in the current Inverness Local Plan. This 25% policy has not been actively rescinded in the HwLDP. The MIR did not give any indication of house numbers and therefore the local community has not been consulted on this. This development does not represent sensitive village expansion as quoted in the Inverness Local Plan (ch6 page 58). It would appear that the phasing strategy has been informed by the developer and not the community (226)

- Area marked 4 in Croy in the Inverness Local Plan does not appear to be included in the Proposed Plan. (226)
- Transport: The Mid Coull to Croy single track road will be adversely impacted upon and any transport statement must take into account the overall impact from both of these future potential developments as part of the overall strategy for the area. Policy 20 does not take into account the current planning application at the new town of Tornagrain only 800 metres from the Croy boundary with a first phase of 304 dwellings. The policy also does not take account of the increase in traffic from other smaller settlements which will use the B9006. Believe that it was the Planning Department's intention to provide infrastructure first before any development. (226)
- All SUDS proposals should be compliant with 'Sewers for Scotland 2' and be of a standard to become adoptable by Scottish Water. In 'Open Spaces in New Residential Developments – Supplementary Guidance' it advises that open spaces including SUDs facilities should ultimately become the economic responsibility of the home owners in the development. This could place an unacceptable economic burden on home owners therefore they should be adopted by either Scottish Water or Highland Council Roads Department as part of Highland Council planning policy and be included in the HwLDP. (226)

Alliance Planning for Church of Scotland General Trustees (345)

- Seek inclusion of 3 parcels of land within an overall expansion for development to the north of the village and re-inclusion of an existing allocated site. All these sites are deemed as being effective in land supply terms (345)

Mary Harrison (73)

- Does not believe new development in Croy is sustainable as it has no employment and residents will commute. There is no Public transport between Croy and Nairn and it is infrequent and slow to Inverness.(73)
- No major development should be allowed in Croy until full infrastructure particularly road upgrades have been implemented. The full infrastructure improvement plan for road, sewage etc must be funded and agreed. (73)

- The A96 Framework talks about “limited growth” – 44% increase in Croy in 10 years, 298% increase in Cawdor is not considered limited growth.(73)
- Preference for the number of residential units to be inline with the 25% rule i.e. 58 houses in 10 years. The numbers must not be exceeded in any case. It is proposed that Croy will increase by 45% in 10 years while Ardersier only 10%. As Ardersier has better infrastructure, this seems unreasonable and illogical.(73)
- If Tornagrain is developed in will provide 844 houses in 10 years, so why does Croy need 100 in this period. It seems like even more development pressure. Tornagrain should not be allowed to proceed until the A96 airport roundabout and the road to Croy has been upgraded. (73)

Scottish Natural Heritage (118)

- The proposal and policy should be subject to Habitats Regulations Appraisal. (118)
- Under Natural, Built and Cultural Heritage element of the policy reference should be made to the protection of Kildrummie Kames SSSI. (118)

Carol Walford (475)

- Objects to the Council’s support for this development as it does not meet with the requirement set out in paragraph 8.1 of the Proposed Plan to ensure that development is directed in the first instance to places with sufficient existing or planned infrastructure and facilities to support sustainable development:
 - The waste water treatments plant only has spare capacity of 68 houses and there is already outline planning permission for 8 houses.
 - The unclassified Mid Coul Road from Croy to the A96 is a single track road and inadequate as a commuter route (photos enclosed as attachment 2 of the representation). However it is the quickest route to Inverness (attachment 3 of the representation) and the Council’s TEC services share the community’s concerns about this road (see attachment 4 of the representation).
 - The development will not be sustainable as residents will need cars to access work, supermarkets and other services. Runs counter to the Sustainable Housing Design for Scotland recommendation that “housing should be located close to employment and services”. (475)
- The Inverness, Nairn and A96 Corridor Transport Study (September

2009) proposes “A96 Ardersier Junction to Airport – ban right turn” (part 1 page 7). Object to this proposed intervention. (475)

- Paragraph 4.2.2 (Vision) promises to “ensure that the special quality of the natural, built and cultural environment is protected and enhanced”. Croy offers the only view of the Black Isle, Moray Firth and Fort George from the B9006 and is a major tourist route between Culloden Battlefield and Cawdor Castle. Once the expansion site is developed housing will block this view. (See photos enclosed in attachment 5 of the representation). (475)
- The number of houses proposed in the period 2011-2021 is 100 and this is significantly above the 25% growth limit in the Inverness Local Plan seek its continued inclusion. A copy of a petition to honour the “25% rule” in Croy is attached to the representation. It would increase the size of the village by 44%. This would overwhelm the existing village. Alternative phasing is suggested which would still deliver 130 houses by 2031. This slower growth makes more sense in the current economic climate. The proposed scale of development also places an unfair burden on the village. An unfair burden is also placed on Cawdor and Culloden Moor, yet the largest of the four villages – Ardersier – has a negligible rate of growth. (475 + attached petition)
- Map 10 gives no indication of the size of the expansion site. 3 hectares of land is unsuitable for housing for reasons of topography and drainage. This should not be include in the expansion site as it allows a developer to count this land as amenity in order to build at much higher density on the remainder of the site. If this 3 ha is omitted it still leaves 11.4 ha. So if 14.4 ha has capacity for 150 houses than 11.4 ha should therefore only have capacity for 120 houses at about the same density. (475)
- The UK Strategic Defence Review may lead to lots of empty housing stock, in light of this should the significant expansion of the smaller settlements not be reconsidered? (475)

Julian Walford (155)

- Agree with the principle of additional housing in these settlements, I object to 'reallocation' if that means that the all the expansion is allocated to housing, and none is planned for other uses contributing to employment and the provision of local village services. (155)
- This is not sustainable development, and I object strongly to Croy becoming just a commuter suburb, with few services. I agree with the principle of 'masterplanning' and believe it should address these issues specifically. See PAN-83 (Scottish Govt.) which notes that masterplanning includes collaboration with the communities concerned. (155)

- also object to 'early completion' if this means an expansion rate which is inappropriately high for the communities concerned. In the absence of guidance from the Scottish Government as regards rural housing density, and in the light of the overall low population density in the Highland area, it is important that Highland Council sets its own high standards as regards acceptable local rural housing. (155)
- object to alien city-style densities and house types in rural villages. Previous local plans have indicated on maps the use (e.g. residential, mixed, etc) and the capacity of expansion sites. Object as the Plan no longer does this. The A96 Framework was accepted by the Council on the basis of only limited expansion of the 'smaller settlements'. (155)
- object to this Framework being re-interpreted as the substantial expansion now detailed in the Plan. (155)
- support Policy 19 particularly 'masterplanning' and 'community consultation' but only if the masterplanning is done properly over the full settlement area, and that the consultation response by the community is not ignored. (155)

EMAC Planning (representing Scotia Homes) (456)

- EMAC Planning for Scotia Homes support the Proposed Plan's commitment to identifying Croy as one of the smaller settlements in the A96 Corridor to contribute to the overall supply of housing in the area is supported (456)
- Scotia Homes Ltd is generally supportive of the proposals and would only seek consideration of a change to the proposals map to include land to the west of Dalcroy Road within the overall mixed use designation (456)
- Generally support the identified requirements of the Policy and will seek to provide these where they reasonably relate in scale and kind to the development allocation and suggested phasing in the LDP (456)
- Scotia's current proposal indicates a mixed use and residential development including 93 dwellings and 4 commercial buildings. The first phase would accord with the Proposed Plan. Scotia endorse the allocation as a mixed use development. The proposed application will also provide for commercial units, community uses and substantial areas of open space (456)
- A number of alternations have been made to the proposal as a result of community engagement including a reduction in the number/density of dwellings, incorporation of a green buffer, relocation of commercial units and an open space provision which exceeds the Council's requirements (456)

- Land to the West of Dalcroy Road (Areas 6 & 9 of the Inverness Local Plan) is included within the settlement boundary of Croy as identified on Map 10 but not for a particular land use. It is requested that this land is incorporated in the wider designation and identified for mixed use. Inclusion of this land within the mixed use designation would allow its future development to be resolved through community consultation (456)

SEPA (326)

- SEPA object to this policy unless the policy includes a developer requirement that, dependant on the specific location in relation to the minor watercourse, 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 within the functional floodplain as defined by Scottish Planning Policy.

JG Walford (300)

- Objection to Croy village, especially in regard to the following matters:
 - The scale and phasing of the expansion, in housing and population terms, of the village;
 - The inadequacy of the road system, and of the transport infrastructure generally, on which
 - the village currently depends - and the apparent absence of a strategy to address these
 - shortcomings on an appropriate timescale;
 - The status in-planning terms, of the area of land, currently-undeveloped, between Dalcroy Road and the top (south-east) end of the recently built Ardgowan housing estate;
 - A lack of clarity as to the requirements for the surface water drainage system (SuDS) to be provided on the Croy Expansion Site.(300)

C Stafford (272)

- The numbers set out in the phasing strategy 15.4.1 for Croy Village on the grounds that they are too generous and neither appropriate to the strategic premise for the HwLDP (A96 Corridor framework which is underpinned by approval for the A96 Master Plan work) nor proven in terms of a specific link to the HNDA - being part of the large Inverness HMA. (272)
- Any housing allocation in the village (s) must honour the strategic premise of limited growth, take place over the long term and not be reassessed to a 20 yr timeframe. Any move away would necessitate a total re-evaluation of the A96 Corridor Development Strategy and the roles that areas are expected to contribute to the wider strategy. (272)
- Take issue with the statement made under HwLDP Policy 19," The

Council will also support the development of the areas identified in the adopted Inverness Local Plan for longer term growth at. .. Croy ... " on the grounds that:

- The site shown, 15.5 Map 10 Croy Expansion, was included in the adopted Inverness Local Plan subject to the policy provisions and rules in operation at that time, and the usefulness or otherwise of the site for long term expansion within this plan period should be revaluated;
- Allocation of the site through the HwLDP in advance of other sites when a development interest is bringing forward a planning application on that site is not appropriate;
- Allocation of only one site in village through HwLDP is not strategic

Julian Walford (155)

- I object strongly to the inadequacies of Policy 20 as drafted, as stated below, as expansion will not be sustainable. Whilst I support expansion at Croy, I object strongly to the proposed rate of housing expansion as it is too high for the size of village and should be limited to a total in the settlement of 25% per decade as per the current local plan. Policy 20 must be amended to include this requirement. If anywhere should expand more it is Ardersier, where there are good road links (three roads mostly dual track to **A96**), a good bus service, and many more shops and services. As Tornagrain is being built with just 1 km between its edge and the edge of Croy, it does not seem appropriate to expand Croy so much. Furthermore I object strongly to all the land being used for housing. Due account needs to be taken of the history of expansion at Croy. (155)

Modifications sought by those submitting representations:

- Seek linkages to be built between policies 58 Natural, Built and Cultural Heritage, Green Networks, 75 Green Networks and 76 Open Space (285)
- Include developer requirement in the Natural, Built and Cultural Heritage section on protection of Kildrummie Kames SSSI. (118)
- Policy should refer to Map 10 rather than Map 11 (456)
- Action sought: That the phasing strategy as set out in 15.4.1 should be revised as set out below:

	2011-2016	2016-2021	2021-2026	2026-2031
Residential	0	Tba*	Tba*	Tba*

Tba* in relation to actions sought in Issue 'Allocation of Croy village Expansion site' (272)

- Deferral of allocation of the site or any part of this site until:
 - (i) A landscape character assessment - HwLDP 19.5.2 - is done, (a) to ensure that character enhancing development could be delivered (for the village as a whole) evenly over the expansion site and (b) to reduce the risk of inappropriately density development on potentially limited 'usable' areas of the site (c) to help the process of managing change (d) to allow community involvement not related to specific developer activity.
 - (ii) In line with (i), a village Design Statement is prepared to take into account the views of the existing community as to how they see their environment changing, rather than this agenda being set by commenting on development proposals brought forward 'in their image' by development interests - see 1 (b);
 - (iii) The Buffer zone between the proposed new town at Tornagrain and Croy village is established to clearly define both settlements and to ensure no coalescence
 - (iv) More consideration is given to the 'accessible rural' nature of the village and the effect of diffuse journeys to and from the village on climate change policy and sustainability;
 - (v) The potential reallocation of this expansion site can be considered alongside other sites (a) which have already been submitted for consideration under the HwLDP and deferred by the council to be considered through the IMF LDP MIR or (b) could be brought forward via the Main Issues Report for the forthcoming IMF LDP to ensure that, taken as a whole, proposals for land allocations are not to the detriment of the rural character of the village;
 - (vi) The rate of growth can be considered carefully so that imbalances in the social structure are avoided;
 - (vii) The aspirations of the landowner can be assessed to ensure that development could be delivered evenly on the whole of this site thus ensuring that maximum opportunity is provided for any expansion to integrate with the existing settlement's form and function;
 - (viii) The Sept 2010 Corridor Transport Study should be expanded to include development at other settlements

Summary of responses (including reasons) by Planning Authority:

Rationale for Allocation

- This land benefits from an allocation in the adopted Local Plan (the [Inverness Local Plan 2006](#) – Written Statement Page 68 and Map Booklet Page 7) which safeguards it for the long term expansion of the village including possible village centre, residential, business and commercial uses. As can be seen on the proposals map, the potential access points are also shown.
- The adopted Local Plan position reflected the fact that Croy is well placed for important and diverse employment locations east of Inverness and there were no significant capacity restrictions in

services. The assessment set under section 10.2 (Page 67) is still relevant in identifying the factors which determine the most opportunities for development. Land to the west of the village was highlighted as suitable for development (para 10.3).

- Housing development in the site identified as 10 (2.5 ha west of Croy) in the adopted Local Plan was granted planning permission in August 2006 for 40 houses. This development is now complete and is integrated into the rest of the community.
- The [A96 Corridor Framework](#) which was approved as supplementary guidance by the Council in 2007 identified the potential for the smaller settlements in the A96 Corridor to contribute to future development. Figure 2 identifies Culloden Moor, Croy, Cawdor, Auldearn and Ardersier as Village Expansion locations and the outline for Cory includes this expansion area. The supporting text indicates that detailed allocations would be brought through the statutory development plans.
- The potential of these locations to deliver additional housing was highlighted in the Main Issues Report and a commitment to identify the appropriate scale of development that could be expected.
- As indicated in the representation received from Scotia Homes, there is active developer interest in the site, which dates back from pre-application discussions held with the Council in January 2010. A copy of the pre-application advice offered is [available](#).
- The Proposed Plan Policy 20 relates to the Croy Expansion site identified in the Inverness Local Plan 2006, but provides a greater degree of detail on the developer requirements associated with it. These developer requirements have been informed by an appraisal of the site, discussions with relevant Council Services and agencies, the prospective developers and from the concerns of the community as raised in various discussions in the run up to the Proposed Plan.
- In regard to the impact of the loss of airbases in Moray, the study undertaken by [Reference Economic Consultants](#) indicates that in 2005 3% of Kinloss and 1% of Lossiemouth civilian staff lived in Inverness & Nairn. There are rules about military personnel living in close proximity to their base and it is unlikely therefore that more than 30-40 base staff are resident in Highland, across the corridor area this is not seen as significant to the housing market..

Phasing of Development

- The Council has set out a phasing plan within Policy 20 which is considered to be proportionate to the size of the settlement and in line with the need to provide for a generous land supply (as set out under Issue 86). There is a clear requirement set out in policy for any development to meet this phasing strategy, and recognition that any development beyond 2021 will be informed by future Local Development Plan reviews. This will allow for an ongoing monitoring of the impact of the development on Croy and surrounding areas.
- Much attention has been drawn towards the lack of compliance with

Policy 2 of the Hinterland section of the [Inverness Local Plan](#) (page 58), which states that the Council will seek to ensure that housebuilding does not generally exceed 25% of the number of existing dwellings in the settlement. It is the Council's position that the policy relating to this site supersedes that set out within the Inverness Local Plan and that the revised strategy is now more appropriate given the wider A96 Corridor context and the need to provide a generous supply of housing land. The phasing strategy as set out is greater than 25% but the facilities, services and infrastructure in the village are considered to be sufficient (with any appropriate mitigation) to accommodate the additional levels of growth in the short to medium term.

- Overall, the phasing of development, if managed appropriately, and with the developer requirements having been met, is regarded as being within acceptable level of development, and broadly reflects what has taken place in the village over the last five years.
- It is recognised that there are other sites in the village allocated in the Inverness Local Plan that have not yet come forward for development (allocation 4 is dealt with under alternative sites below). The addition of the site allocated under Policy 20 will add to the range and choice of sites in the village, and it is regarded as an effective site in that it has an active development interest, and no major infrastructure constraints. That said, the reporter may wish to consider whether a revised phasing schedule should be put in place.

Infrastructure Deficiencies

- A number of respondents have commented on the impact of this development on a whole range of infrastructure issues, including transport, drainage and community facilities. The developer requirements set within Policy 20 seek to address many of the concerns raised. The pre-application advice offered for the site involved detailed discussion with other Council services and other agencies. No major issues were raised that questioned the principle of development on the site. Rather, issues were raised to be addressed by any developer.
- No objections have been received from Transport Scotland in relation to strategic transport implications or from Scottish Water in respect of wastewater treatment or water supply capacity.
- The model used to prepare the [A96 Corridor Transport Study](#) (September 2010) did include provision for limited expansion of key villages in the corridor. The transport zone for Croy included a total development of 200 houses in the period to 2031, roughly at a rate of 10 per year. The impact of this development is therefore included in strategic transport considerations.

Boundary of site

- As noted above, the allocation indicated in the Highland wide Local Development Plan relates to the expansion site indicated in the

Inverness Local Plan. The area being promoted for development by Scotia Homes also includes the area currently designated as “Special Uses” in the Inverness Local plan (Policies 6 and 9 refer, Page 67). This land is allocated for community/commercial uses and associated amenity areas. The Plan notes that the site would be suitable for relocating the shop or a hotel/public house, which could create a focal point for the village. There is therefore a commitment already to built development on the site.

- The site referred to above was not included within the allocation in the Highland wide Local Development Plan. As a result any proposal on that particular site will be considered on the current Inverness Local plan policy, albeit that it is fundamentally linked to the updated planning policy on the expansion site. The Reporter may therefore wish to recommend that this site be included within the overall allocation covered by Policy 20.
- The Tornagrain proposal does lie within a relatively close proximity to Croy, although the initial phases are self contained and will have landscaping elements built in to ensure clear separation and minimal disturbance to the village of Croy. The phasing strategy for Tornagrain as set out in the Local Development Plan is dependent on substantial upgrades to the A96 in the medium to long term. As will be clear from the proposals lodged for Tornagrain, there is no prospect of coalescence of the two settlements.

Natural Heritage Issues

- The site is not covered by any designations.
- A number of have raised the issue of the impact of drainage proposals on Loch Flemington SPA which lies approximately 2.2 kilometres from Croy. The Council is considering the proposal individually and cumulatively as part of the Habitats Regulations Appraisal.
- Other issues, including the need for badger (and other protected species) survey and protection plan and a landscape assessment are set out within Policy 20.

Agricultural Land

- According to the information available to the Council, this site is not prime agricultural land. However, where development is identified on and which is prime agricultural land, the Council follows [Scottish Planning Policy](#) which states that “development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructure development, where no other suitable site is available”.

Alternative sites

- A number of alternative sites have been promoted by the Church of Scotland General trustees, one of which is already allocated in the

Inverness Local Plan (Allocation 4). The Church of Scotland is seeking a major increase in the capacity of that site from the 15 specified in the Local Plan to 48. It is not considered suitable for this change to be introduced at this stage in the Plan preparation and that a more appropriate route is to promote all of the sites through the inner Moray Firth Call for Sites process.

- Sites 1, 2 and 3 in the Church of Scotland submission currently lie outwith the settlement boundary as identified in the Inverness Local Plan. Development would not therefore be supported at this time.

Any further plan changes commended by the council

- Policy 20 should read under Miscellaneous:

A landscape and visual impact assessment will be required.
- Under Natural, Built and Cultural Heritage element of the policy reference should be made to the protection of Kildrummie Kames SSSI.
- Policy should refer to Map 10 rather than Map 11.

Reporter's conclusions:

Reporter's recommendations: