

Issue 42		Business and Industrial Land	
Development plan reference:		Policy 42 (Para 20.4, Page 90)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number)			
Irene Brandt (18), Nairn Suburban Community Council (94), Scottish Natural Heritage (SNH) (118), Highlands and Islands Enterprise (HIE) (190), John Waring (250), Eveline Waring (253), Scottish Environment Protection Agency (SEPA) (326), Trustees of the Harbour of Inverness (352), Thurso & Wick Trade Union Council (437), Boyd Brothers Haulage (438), Cromarty and District Community Council (443), Dalgleish Associates Ltd for Kishorn Port Ltd (Kishorn) (466)			
Provision of the development plan to which the issue relates:		Business & Industrial Land (p.90)	
Councils summary of the representation(s):			
<u>Representors commenting regarding site allocations:</u>			
<ul style="list-style-type: none">• The list of sites referred to in paragraph two of the policy should include Inverness Harbour (352)• Oppose the expansion of Inverness Airport and the development of a business park there (18)• Question the continued appearance of a site at Murkle Bay – since the 70's this site has been identified in connection with potential oil and gas industry opportunities. The Forss site is now a Business Park. SG might be a useful way of updating these apparent anomalies? (xref: renewable energy developments policy) (437)• Industry and port infrastructure are key to developing offshore renewables, and the N-RIP sites at Kishorn, Ardersier, and Nigg have a very strategic and important role to play, whilst smaller but strategic sites are identified along the Greater Moray Firth Coast such as Wick. N-RIP2 has reference to the Pentland Firth and Orkney waters commercial scale leasing round. A cluster of existing sites in Highland and Orkney have been identified as industry hotspots for wave and tidal developments including Wick, Gillis and Loch Eriboll in Highland. However over the lifetime of the plan further sites of strategic importance may be identified (190)• Clarification is sought over whether sites listed in policy are existing sites or new broad allocations for sites to be zoned in the area Local Development Plans (118)• Paragraph 20.3.4 – Would welcome investment support of Inverness harbour once locations for the marine renewables industry have been clarified (352)• A Masterplan for the Kishorn Yard will serve to meet the strategic vision for the site as set out in the Proposed Plan. It is proposed that a Masterplan development framework is submitted to the Council for consultation and as possible adoption as Supplementary Guidance (466)			

Representors commenting regarding land use/types of business development:

- Carefully plan for primary industries as they are better at securing and retaining local wealth than the service sector and multinational retail outlets (94)
- SEPA object unless Policy 42 "Business and Industrial Land" is amended to include waste management as an appropriate land use. This approach provides certainty in requiring Local Development Plans to identify preferred locations for waste management facilities to meet the identified requirements, but also enables flexibility to address future demand. This would be in line with the Zero Waste Plan Annex B, and with Scottish Planning Policy (326)
- SEPA previously supported the position in the Highland wide Local Development Plan: Main Issues Report Preferred Option, and of draft Policy 1: Waste Management Policy (draft Waste Management policies April 2010), to identify existing and allocated industrial and employment land and brownfield land as appropriate locations for waste management facilities. Whilst Policy 71 and Policy 72 relate to "strategic" waste management sites, there is no additional text identifying, or providing guidance on, appropriate locations for waste management facilities which may be smaller in scale (326)
- It may be appropriate for this to be included within Policy 43 Previously Used Land – the policy refers to bringing previously used land back into beneficial use and, in line with the Zero Waste Plan Annex B and Scottish Planning Policy, waste management facilities may be considered appropriate uses for this land (326)
- We highlighted in a previous submission the short supply of land for Classes 4,5 and 6 uses in particular areas, and a reference is now made in para 20.3.3 refers to this and that further work in this respect is set out in the Action Programme. A specific and robust response would have been more helpful. Given the weight of the requirement for business and industrial land, it is disappointing that this policy has not been given more prominence (190)
- The findings and subsequent discussion of August 2010 Graham and Sibbald report on business and industry land should be given due consideration (190)
- The present economy is predominantly weighted towards service and administrative sectors and there is no opportunity to develop sustainable industries (18)
- Feel the emphasis on housing is too strong with the only large industrial allocation being Nigg. Other commercial and industrial needs appear to be met by allocations for 'mixed use'. There is a danger that the supply of industrial and commercial land will prove inadequate unless specific allocations are made. It is appreciated that these are unlikely to prove popular with developers because of the lower value of such land and that accordingly the 'developer contributions' will be lower reducing Council receipts but this interest should not be allowed to determine allocations. Allocation of development land uses should be determined by an integrated development strategy and not driven

by development proposals per se (190)

- Policy should encourage business owners/tenants to diversify and expand to encourage economic growth and stimulate employment in highland (438)
- Welcome any expression of support for sustainable local economic development (to reduce reliance on commuting) and any requirement to revisit existing Highland Council policies to support this (an obvious example is the present allotments policy) (443)

Other miscellaneous comments:

- New businesses should be judged both on what they bring to the area and how they affect the environment (250, 253)
- A better analysis of "jobs" is required when promoting development (94)
- As third para. of policy allows for possible business uses outwith the allocated sites this should be assessed as part of SEA and Habitats Regulations Appraisal. Without prejudice to this the policy indicates a sequential test but this is not included in the policy (118)

Modifications sought by those submitting representations:

1. Modifications regarding site allocations (including representors seeking additional allocations):

- Inclusion of Inverness Harbour to list of sites in para 2 (352)
- Recommend that the list of strategic locations should also include Uig, Ullapool and Mallaig because of their strategic importance to the west coast (190)
- It is felt that the following sites merit detailed consideration:- Whiteness, Highland Deephaven, Inverness Airport business Park, Delny, Cromarty Firth Industrial Park, Inverbreakie, Alness Teaninich Industrial Estate, Alness Point Business Park, Evanton Industrial Estate, Nairn Balmakeith, Dingwall business Park, Muir of Ord Industrial Estate, Blarliath Industrial Estate and others (190)
- Recommend the scope to expand existing business locations is protected and that there is a presumption against piecemeal development precluding a future strategic land supply (examples include Portree Industrial Estate, Blar Mhor Industrial Estate and Glen Nevis Business Park) (190)
- Recognise the Strategic importance of N-RIP and N-RIP2 any future strategic sites, alongside all the Highland ports and harbours, and promote their future use and development. (190)
- Policies should be in place to avoid industrial allocations being merely land unsuitable for residential or other uses due to difficulties of access, servicing, contamination etc. (190)
- Clarify list of sites in policy by setting out which are existing sites and which are to be new sites in area Local Development Plans (118)
- Remove allocation for expansion of Inverness Airport and Business Park (assumed) (118)
- Clarification of why site at Murkle Bay is included (437)
- Inclusion of specific allocations of industrial land (190)
- Additional text to identify/ provide guidance on existing or proposed

industrial, employment or brownfield land as appropriate locations for smaller scale waste management facilities (326)

- A specific and robust response to be included regarding the potential shortfall in supply of Class 4,5 and 6 land (190)

2. Representors seeking amendments to policy:

- Policy augmented to read, *“Applications will need to demonstrate to the Council’s satisfaction that development on an allocated site is not possible.”* In the sentence beginning with ‘such proposals will still need to be assessed...’. (118)
- SEPA seek inclusion of waste management as an appropriate land use (326)
- Amendment/s to policy to make it consistent with findings of Graham and Sibbald report on business and industry land – assumed (190)
- More reference to ‘primary’ industries (94)
- More analysis of ‘jobs’ (94)
- More encouragement in policy for owners/tenants to diversify and expand (438)

Summary of responses (including reasons) by Planning Authority:

Allocation of Sites including Industrial Land Supply:

- The Council’s Action Programme outlines our intention to work with HIE on identifying and assessing possible options for future industrial land supply in the Muir of Ord area - this will initially be undertaken as part of the Inner Moray Firth Local Development Plan Call for Sites. Other industrial allocations will also be identified through the Area Local Development Plans. In terms of the sites suggested, the majority are allocated within the policy text and the remainder could be considered as part of the Area LDP preparation. The development of Inverness Airport and Business Park is the main strategic business growth allocation and an essential component of the A96 Corridor Growth Strategy. It is felt it will become an important economic centre and will also play a role in attracting employers to the Highlands.
- The Plan does identify a range of business and industrial sites however Nigg is given a specific policy as a reflection of the Council’s ongoing commitment to bringing it back into productive use.
- It is not felt appropriate to allocate Inverness Harbour within this particular section of the Plan however support for its development is provided in the Inner Moray Firth Vision which states that *ports and harbours, including Inverness, will have supported the growth of tourist and renewables related economic development by 2030.*
- The Council’s response to the inclusion of a site at Murkle Bay is contained in the Schedule 4 for Renewable Energy Developments (Issue 68).

Development of Marine Renewables:

- Working with HIE regarding marine renewables is also ongoing – we will work with the marine energy industry and partners such as HIE to

establish the likely land requirements and infrastructure needs of the emerging industry

Kishorn Masterplan:

- The submission of a Masterplan would be considered by the Council as an appropriate way forward as indicated in the text. Dependent on the compliance of the masterplan with existing policy it may be adopted as statutory or non-statutory supplementary guidance.

Waste Management Uses/ Previously Used Land:

- Scottish Planning Policy states that locations which are appropriate for industrial and storage and distribution uses are appropriate for many waste management installations. This is the same approach adopted by the Highland wide Local Development Plan. As such it is not felt necessary to implicitly include waste management or any other acceptable uses within the policy text. In terms of previously used land, this can include a vast array of sites, including those within well populated residential areas where waste management uses would not be considered acceptable. Applications for development of previously used land will be determined on a case by case basis.

Employment Opportunities:

- Plan identifies strategic areas for strategic areas of Business and Industrial employment opportunities. The forthcoming area Local Development Plans will identify opportunities for more locally based employment opportunities. The Council is happy to consider proposals for expansion of existing businesses

Sustainable Development:

- The Highland wide Plan as whole seeks to identify sustainable development opportunities, these aspirations are supported and underpinned by policies in the Plan through its spatial development strategy, through use of existing infrastructure and services and opportunities for local economic development. These policies include:
 - Policy 29 Sustainable Development which encourages development compatible with existing services
 - Policy 57 Travel which points development to areas where travel generation can be met locally or through sustainable development modes
 - Policy 35 Settlement Development Areas

Assessment of Business Proposals:

- Development proposals for business will be assessed against all policies in the plan, this includes their proposed economic benefit and impact on the environment.

Habitats Regulation Appraisal:

- Separate discussions are ongoing with regard to completion of a Habitats Regulation Appraisal

Any further plan changes commended by the council

Reporter's conclusions:

Reporter's recommendations: