

Issue 85		Spatial Strategy - General	
Development plan reference:		Chapter 8 - Spatial Strategy - General (Pages 20 - 21)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number)			
Graham + Sibbald for Dereck Mackenzie (35), Halliday Fraser Munro for Tulloch Homes (57), Halliday Fraser Munro for Fairways Leisure Group (69), James Barr for MacDonald Estates PLC (98), Nairn West Community Council (101), Julian Walford (155), Highlands and Islands Green Party (HIGP) (168, 533), Valerie Springett (179), Fortrose and Rosemarkie Community Council (203) Croy Community Council (218) Strutt & Parker LLP for Balnagown Castle Properties Ltd (229), Muir Smith Evans for Inverness Estates Limited (249), Turley Associates for Sainsbury's Supermarkets Ltd (267), Scottish Wildlife Trust (285), Inverloch & Torlundy Community Council (318), Scottish Environment Protection Agency (SEPA) (326), Mrs M McAlister (378), Moray Council (403), Boyd Brothers Haulage (438), Scottish Association for Public Transport (446), M Gilvray (453), Strutt & Parker LLP for I & DJ Alexander (Alexander) (488), Bracewell Stirling for Aviemore and Inverness Properties LTD (501)			
Provision of the development plan to which the issue relates:		Spatial Strategy – General Comments	
Council's summary of the representation(s):			
<u>SEPA (326)</u> <ul style="list-style-type: none">Section 8 Spatial Strategy appears to be an introduction to the spatial strategy and relates to the whole document and we therefore suggest it should come before sections 5, 6 and 7. This is not an objection. (326) <u>Halliday Fraser Munro Planning for Tulloch Homes (57)</u> <ul style="list-style-type: none">The spatial strategy to support growth in areas with existing infrastructure capacity is supported in the main; we do not accept however that all the land identified or proposed in the Plan for the short to medium term is deliverable. We conclude that additional land will be brought forward in the period to 2016 to make up shortfall. Delivery of existing allocations in a phased manner will allow infrastructure constraints to be overcome. Difficulty in raising finance along with onerous infrastructure costs should encourage a more pragmatic programme of delivery. (57)The Council's policy to promote high migration to inform housing land requirement is applauded (57) <u>Scottish Wildlife Trust (285)</u> <ul style="list-style-type: none">The Spatial Strategy figure (Figure 3) should give an indication of the green network (285) <u>Graham + Sibbald for Dereck Mackenzie (35)</u>			

- Para 9.3 (CtC) suggests that all housing land has been identified, at odds with the Councils intention to seek “developer bids” for sites. It is not the role for the HwLDP to make specific site allocations, this should be role of Inner Moray Firth Plan. (35)

Halliday Fraser Munro (69)

- Wish to promote mixed use development at Fairways to assist in the provision of an effective deliverable housing land supply as defined in the Consolidating the City element of the plan. (69)

James Barr for MacDonald Estates PLC (98)

- The Council should recognise that there are alternative effective sites in East Inverness such as Balloch Farm. It is acknowledged that the land has potential to provide for future growth and expansion in the longer term however it should be identified and supported through the HwLDP as an effective housing release site with cumulative benefits to the local communities of Balloch and Culloden. Is a viable development opportunity which could be progressed within the lifetime of the emerging local development plan, which does not have the constraints that other sites have in East Inverness (98).
- The principles and policies of the Highland wide Local Development Plan should ultimately be progressed through the proposed area local development plans where site specific allocations and appropriate development policies will be provided (98).
- Supports the efforts of the council to accommodate the increase in the population of the Highlands but HwLDP needs ensure that sufficient land is allocated, especially where is adjacent to existing settlements(98).

Nairn West Community Council (101)

- Over-reliance on public sector jobs which is unsustainable (101)
- The strategy to continue expansion of Inverness City and concentration of development within the Inner Moray Firth will exacerbate growing regional imbalance between the city-region and wider Highlands. (101)
- The emphasis on delivering more land for housing and business development within Inner Moray Firth is totally misplaced. Existing assets should be protected and enhanced rather than destroying the unique qualities and advantages of this area through new development, risking a combination of Irish housing –boom-and-bust and Spanish “concrete costas” disaster. (101)
- The proposals for Nairn are neither justified nor appropriate, notably the continued presumption in favour of massive housing development and population growth. Whilst Nairn should be expanded/redeveloped at a

measured rate, this should be based on a rational plan for the necessary infrastructure and regeneration of the town centre in advance of housing developments. (101)

- It is unsustainable to look at the current fashion for renewable energy to underpin regional growth as the economic opportunities the currently provide will not last. (101)
- Nairn is only being offered four substantial tracts of land for housing which is the wrong priority and does not add up to a comprehensive development plan. Simply repeats errors of past with large housing development at the peripheral and piecemeal projects in town centre (101)

Valerie Springett (179)

- With reference to A96 corridor and Nairn expresses concern regarding perceived excessive scale of development proposed using Ireland as an example. Suggestion that employment and business situation (Kinloss and ROK) suggests migration is less than projected. Mention made to current housing stock available for sale (179).

Strutt & Parker for Balnagown Estate) (229) and Strutt & Parker LLP for I & DJ Alexander) (488)

- Object to this section being contained at chapter 8. It should be set out before dealing with the spatial strategies for the three areas to provide the context and aid understanding of the plan. (229) (488)
- Object to the absence of any assessment of the employment/business land requirement in the spatial strategy. (229) (488)
- Object to the contents of table 1. Supports the identification of a strategic requirement over a 10-year period but the contents of table 1 do not appear to be sufficient to meet the aspirational population growth set out at paragraph 8.4. It is not clear how the housing requirement will be split up when preparing the three land allocation LDP's.(229) (488)
- Object to paragraphs 8.7 and 8.7.1 as they say nothing that is not already said elsewhere in the plan. (229) (488)

M Gilvray (453)

- The aspiration to grown the population from a figure of about 200,000 in 2008 to 500,000 over 20 years is not supported by any of HC's own figures or those of the GROS (variously given at between 260,000 and 240,000 by 2031). In terms of housing needs, there appears little justification for the adoption of a high growth scenario and then adding 25% for 'flexibility'. According the Council own figures demand might only be for 12,500 units taking the lower figures rather than the 33,000 assumed by the plan (453)

- Do not need more bland and poorly planned estates of 3 bed detached houses delivered by volume house builders but development which achieves better design and environmental standards and is better tailored to demand (453)

Muir Smith Evans for Inverness Estates Limited (249)

- It is noted that the illustrated expansion areas apply particularly to the existing residential expansion areas of the Adopted Inverness Local Plan and that the land at Milton of Leys (30ha) is not illustrated because it is not allocated for residential development. Suggestions provided below (249)

Margaret McAlister (378)

- There are already far too many unoccupied houses in this District there is no need to increase their number, at this time when nothing is selling. It would be a massively over indulgent to the benefit of Developers and would do little for people who already live in this area (378)

Inverlochy & Torlundy Community Council (318)

- Lower levels of immigration and immigrants returning home means high rate of population growth used in plan will not be achievable. Economic downturn will likely result in fewer jobs to attract people from elsewhere or force current residents to relocate elsewhere. Thus the amount of land/number of houses required to accommodate the high growth scenario is too high, cannot be justified and should be addressed. (318)
- Despite claims that a surplus of land is required to provide developers with a choice of sites, they will invariably choose sites that offer the greatest profit, often on fairly level land of high agricultural value that ought to be protected for much needed food production. Sites of good quality agricultural land should be deleted. (318)
- Suggestions that sites not developed within 5 years should be deleted is illogical, as current economic downturn requires a more flexible approach to encourage developers to take on difficult sites by reducing the developer contributions. (318)
- There are risks attached to concentrating industrial and commercial developments around the Moray Firth as much of the area is likely to be at risk of flooding from future climate change, and it should not be to the detriment of the remainder of Highland. (318)
- Instead of planning for the now less likely high rate of immigration, greater importance should be attached to retaining the existing population, especially minimising the drift of youth away from the Highlands. This could be achieved through extending the provision of further education and distance-learning facilities, which will provide potential new

businesses with a skilled workforce. These aims will not be helped by a policy of closing schools. (318)

Moray Council (403)

- The Highland Council wishes to develop its role in renewable energy. In accord with the Scottish Government's National Renewables Infrastructure Plan (N-RIP), Nigg and Whiteness (former Ardersier fabrication yard) are proposed as sites for the development of the renewables industry. It is the intention that the Nigg Masterplan, which identifies two options for the site; (1) a multi-use site which focuses primarily on oil-related activities whilst incorporating renewable energy developments, and, (2) a 'Green Energy Park' which utilises the entire site for inter-related renewable activities, will be adopted as supplementary planning guidance. In addition, the Council will support renewable energy development at Whiteness, should residential/tourism development not materialise. As set out in the N-RIP, part of the Moray area (up to and including Buckie) is included within the Moray Firth port cluster area, and the Moray Council is keen to work with the Highland Council and Highlands and Islands Enterprise (HIE) to develop and complement economic growth opportunities in both Moray and Highland. (403)

Turley Associates for Sainsbury's Supermarkets Ltd. (267)

- The plan identifies Regional, Sub-regional centre and local centres but their role is not defined. (267)
- Given the level of growth planned for Nairn, Nairn should be promoted to a sub-regional centre (267)

Boyd Brothers Haulage (438)

- Concerned the proposed plan and resultant choice of vision, strategy and landuse policies may inhibit and restrict potential economic growth within the Highlands. (438)

Scottish Association for Public Transport (446)

- Plan seriously underestimates the impact of future oil shortages and price rises on the Highland area. The result of which means the plan concentrates on road schemes while putting little or no focus on the role of the rail network. (446)
- Development should be focused on existing settlements which have good public transport links. Developments remote from existing towns are likely to face particular transport problems. This was written in response to question 10 and 13 of Main Issues Report rather than the Proposed Plan but was submitted as a representation to the proposed plan. (446)

Aviemore and Inverness Properties Ltd. (501)

- Spatial Strategy is heavily concentrated in the A96 and will skew investment in that direction which will lead to limited opportunities for growth of other communities which lie outwith these growth centres. Drumnadrochit is a particular centre which may be significantly disadvantaged by this. (501)

Fortrose and Rosemarkie Community Council (203)

- The Community recommends:
 - The first sentence of Paragraph 8.4 is deleted to avoid confusion

Julian Walford (155), HIGP (168)

- Whilst I agree that it is prudent to plan on an optimistic growth scenario, due account should be taken of the recent uncertainties relating to market housing, and employment, particularly as the area may be vulnerable to reduced public sector employment. I would strongly advocate a measured release of housing land which is balanced by the release of land for employment and commerce. If employment or housing take-up does not proceed as envisaged, then the housing allocations should be cut back at each location until it does. I object strongly to some disingenuous maps presented as regards Spatial Strategy. The Tornagrain site is in reality very close to Croy, (boundaries less than 1 km apart) and it appears that this fact has now been deliberately hidden from the Plan reader. Map-7 (Tornagrain) should show the Croy expansion site but the legend has obscured this. Figure 6 should show the smaller settlements in relation to the other sites, particularly Tornagrain (and Inverness and Nairn expansion). The red Croy label seems to have been positioned to deliberately obscure the Tornagrain site. Note that in contrast, the Main Issues Report (page 21) did clearly show the development at Croy, though only as constructed, and that the A96 Corridor Development Framework also clearly showed this relationship (p14). I object strongly to the change of policy from the 2006 Inverness Local Plan, which limited house-building growth in the smaller settlements to 25% per ten year period, and strongly urge its retention, except where settlements are properly planned and delivered with housing matching employment in a sustainable manner.
- Deeply concerned about the prominence in the Plan of the provisions (principle and detailed) for the A96 Corridor, notably the proposed development of Tornagrain and East Inverness (though we support the plans for Beechwood). First and foremost, the Plan manifestly fails to assess and analyse the likely impact a developed A96 Corridor will have on the Highlands outwith Inverness. Such an assessment should be a core feature of the Plan. If these two areas are supported in the Plan the inevitable consequence will be that population and jobs will haemorrhage from across the Highlands into the Corridor, so negating otherwise more welcome provisions of the Plan for developing existing communities.
- Furthermore there is no case now, nor in the foreseeable future, for new

developments at East Inverness and Tornagrain – even on a ‘scaled back’ basis – when Inverness itself is crying out for investment, and when impending cuts in defence spending are likely to have severe economic effects for Moray and Nairnshire. It is extremely likely that a substantial number of people will travel to work in Inverness from West Moray and Nairn, negating the need for more housing East of Inverness, and these developments could compete with much needed reinvestment here.

Croy Community Council (218)

- Concern the Plan seems to be used to support developments which have not been confirmed in the plan and it has not yet been adopted

Modifications sought by those submitting representations:

- Clarification the this plan must not prejudice consideration of sites as part of the Inner Moray Firth Local Plan (35)
- Inclusion of Fairways in providing effective land supply (69)
- Review and reduce the scale of housing developments proposed in allocations for Nairn and the A96 Corridor (179)
- Renumber chapter 8 to chapter 4 with subsequent alterations to the following chapters. (229) (488)
- Include an assessment of the employment/business land requirement for the area over the plan period. (229) (488)
- Update table 1 to increase the housing land requirement otherwise the aspiration of achieving a population of 500,000 people will not be met. (229) (488)
- Provide a plan showing the Housing Market Areas and clearly identify how this ties in with the 3 land allocation documents to be produced at a later date. If necessary split the requirement for Wester Ross to provide clarity. (229) (488)
- Remove paragraphs 8.7. and 8.7.1. (229) (488)
- Greater emphasis should be placed on improving infrastructure (transport and other comms networks) to attract investment in businesses to offer sustainable employment. (101)
- Greater focus on tourism/recreation, agriculture, energy, the environment and IT-related industries which lend themselves to remote working. (101)
- Give priority to delivering opportunities and incentives for inward investment (rather than inward migration), including examining financial and fiscal frameworks (rates etc). (101)
- Decentralise and stimulate regional/sub-regional centres such as Dingwall,

Wick, Nairn, Ullapool & Ft William by relocating administrative functions and facilities to these locations. This would alleviate pressures on infrastructure in Inverness/IMF, reducing urgency of major capital expenditure in and around the city. (101)

- Nairn and other sub-regional centres should have a sensible and u-to-date town masterplan which takes account of role and functions, capacity for growth (including infrastructure) and regeneration opportunities. Housing should be subordinate element. (101)
- Addition of text to make it clear the illustrated expansion areas refer only to residential areas (249)
- Reference needs to be made to the fact the Strategy does not invalidate the land use allocations on policies within the adopted local plan (249)
- Addition of additional illustrative area to the diagram (perhaps in a different colour)
- Reduce the requirements for housing allocations (378)
- The definition of the role and function of each tier in the settlement hierarchy should be included. (267)
- Nairn should be included as a sub-regional centre (267)

Summary of responses (including reasons) by Planning Authority:

Spatial Strategy – General Comments (57, 326, 318, 35, 179, 229, 488, 453, 155)

- The spatial strategy for the Highland wide Local Development Plan is based on an assessment of the [Housing Needs and Demand](#) for the area as a whole. It is recognised that in most parts of the Highlands, the land supply is more than sufficient to meet projected needs. In Inverness and Nairn however, there are specific land supply issues, which have been addressed by the preparation of the [A96 Corridor Strategy](#), which was adopted by the Council in 2007. There is a requirement to bring this strategy into the statutory framework of the Local Development Plan, and that is one reason why there is specific land allocations relating to these areas in this Plan.
- This will not preclude further sites coming forward, particularly in settlements outwith the A96 Corridor and infill sites within the city of Inverness as part of the Inner Moray Firth Local Development Plan. Indeed the Council has commenced a [call for sites exercise](#) to allow this to happen.
- Section 8 of the Plan is an introduction to the spatial strategy as a whole, and the Council would be content for it to be moved as suggested by SEPA if the Reporter feels that it would aid the flow of the Plan.
- Further reference to population and housing land supply are covered in the Schedule 4 for Issue 86.

- Reference to employment and business land was given in the Monitoring Report prepared to inform this Local Development Plan. No major issues were identified at that time, as there evidence that the supply of land met the requirements for the short to medium term. It was anticipated that any requirement would be picked up through the area Local Development Plans. HIE has subsequently submitted an assessment of the [requirement for industrial land in Inverness](#) and this will be actioned through the Inner Moray Firth local Development Plan.
- The Council does not consider that the impact of the spending cuts in the wider area (including Moray) should mean that any less of an ambitious growth agenda should be put in place. Indeed, it is essential that the infrastructure requirements, land provision and strategic policy is put in place now to support growth when the economy recovers.

Alternative Sites (69, 98, 501)

- The site at Balloch has previously been considered in the context of the A96 Corridor Strategy and at Main Issues Report stage. At both these stages, the site was not taken forward. It is not considered that a development at this location is appropriate given the identified land supply within the city of Inverness and the development opportunities already identified to the east of Inverness.
- A site at Fairways may have the potential to contribute to the Inverness city land supply at some point in the future, but it is not considered appropriate to introduce the site at this stage in the plan preparation. The existing land supply in Inverness is considered to be sufficient in the short to medium term. The Inner Moray Firth Local Development Plan Call for Sites exercise offers a more useful means of investigating the potential for the site.
- Other sites in the areas around Inverness, including Drumnadrochit, will be covered in detail in the Inner Moray Firth Local Development Plan.
- Additional information on the housing land supply for Inverness and surrounding area is given in the schedule 4 for Issue 86.

Nairn (101, 267)

- The Local Development Plan provisions for Nairn are dealt with under the relevant schedule 4 for that issue. Nairn has a role to play in the future growth of the Highland area, and is not covered by an up to date Local Plan. The provisions of the Highland wide Local Development have sought to put in place a strategic overview of the land supply for the town, although it has always been recognised that the future area Local Development Plan will provide a more focussed “whole town” approach to the wider areas not covered by the content of this Plan. This has arisen from the fact that the A96 Corridor Framework looked only at these strategic areas, and this has been carried forward.
- Further consideration of the definition of sub-regional centres is covered under the Schedule 4 relating to retailing.

Mapping (285, 155)

- There is no deliberate attempt to confuse readers of the Local Development Plan in respect of the mapping to support the spatial strategy. The Council will make changes to the mapping to better reflect the situation on the ground.
- Further matters relating to Croy are dealt with under Issue 20.

Milton of Leys Film Studio Site (249)

- The existing provisions for this site remain in force until such time as the Inner Moray Firth Local Development Plan is prepared. It will be appropriate to make this clear throughout the Plan and it is commended that a statement to this effect is included within the body of the introduction to the Local Development Plan. In respect of this specific site, the Council will be prepared to accept whichever option the report sees fit to agree with from those suggested in the representation.

Any further plan changes commended by the council

Reporter's conclusions:

Reporter's recommendations: