

# INVERLOCHY CASTLE LTD

## STATEMENT OF FURTHER INFORMATION

### HEARING 1: THE ALLAGED OVER PROVISION OF LAND ALLOCATED FOR HOUSING DEVELOPMENT IN FORT WILLIAM

The following statement sets out the response on behalf of Inverlochy Castle Limited (ICL). Iain Michie, BSc MRTPI MRICS, Partner of Montagu Evans will attend the Hearing Session on this issue.

Documents: THC 1: Highland Structure Plan: Approved March 2001  
THC 3: Lochaber Local Plan: Adopted February 1999  
THC 12: Scottish Planning Policy 3: Planning for Homes: Scottish Government: 2008

**1. Clarification of the existing “established” land supply for housing in the Fort William settlement development area.**

We agree with The Highland Council’s (THC’s) list of established housing land supply in Table 1 of the statement of further information. It is noted that the established supply, at December 2007, is estimated to be 622 units. That includes 200 at Caol/Lochyside and 300 at Upper Achintore, allocated sites in the 1999 Adopted Lochaber Local Plan.

The background to the allocations that form part of the established land supply is relevant, to this hearing, in the context of assessing the effectiveness of the existing supply. The structure plan, approved in March 2001, states that local plans are the vehicle for implementing the housing policies through specific housing allocations. The structure plan allocations have been calculated on an Area basis consistent with current and future local plan boundaries. Local plans are required by the approved structure plan to identify sites to accommodate new developments up to these allocations. The allocations for Lochaber in the approved structure plan, are 1,000 for the period 1998-2007, and 1,000 for the period 2007-2017. It is stated in Policy H1 that “*account will be taken of existing land allocations and infrastructure capacities*”.

The existing Lochaber Local Plan was adopted in 1999, it refers back to The Highland Structure Plan, approved by the Secretary of State in November 1980. The adopted local plan identified Fort William as the principal growth point in Lochaber with a projected building requirement of 750-800 houses in the period up to 2011. The adopted local plan sought (at paragraph 4.3.5) to direct expansion of Fort William to major sites at Caol/Lochyside and Upper Achintore where more than 40ha of land with capacity for 550 houses was identified. The local plan acknowledges that these expansion sites required substantial on-costs in site works, infrastructure and possibly land assembly.

The adopted local plan states that : “*Priority needs to be given to co-ordinated action by the housing, economic development agencies and private sector to address the major on-costs necessary to ensure that availability of further development land in these locations*”.

It is clear, even at the point of allocation, that there were reservations about the effectiveness of the major expansion sites at Caol/Lochyside and Upper Achintore. We do not provide any evidence on the current position but note that these sites have been allocated since 1999 and remain to be developed.

**2. The total and/or additional requirement for housing land in Fort William which arise from the approved structure plan.**

We agree with THC’s comments in response to the structure plan housing requirement. We would add that the structure plan requirement for Lochaber in the period 1998-2007 is 1,000.

**3. *The scale of housing development which the local plan seeks to deliver in Fort William within the plan period.***

We note and agree with the list of sites in Table 2 of THC's statement of further information.

**4. *How the Torlundy and Fassfern Proposals relate to Housing Requirements and Housing Supply?***

We have no comments to add to THC's response in it's statement of further information.

**5. *Does the provision in the Local Plan equate to an over supply of housing land, or not?***

THC state that *"in simplistic, quantitative terms"* there is an over supply of housing land. THC equate the supply to an average requirement, and to past building rates and on both measures, conclude that there is an oversupply.

We agree that, in quantative terms, there is an oversupply.

**6. *If there is an over supply, would a reduction be justified, and on what basis should any modifications be made in order to secure that reduction.***

THC's response is that a quantitative analysis of housing supply and demand is of limited relevance to many parts of rural Scotland including Lochaber. THC considers that the real issue is whether allocated land is effective and whether it can be delivered.

We agree with THC's appraisal of the land supply issue.

THC's response goes on to justify its appraisal and to comment on the constraints that might apply to individual sites.

We generally agree with THC's statement on these issues. We would also refer the Reporter to the Scottish Government's policy on housing land in SPP3.

The overarching aim of SPP3 (Revised 2008) is *"to refocus the role of planning in the delivery of housing, from debates around the calculations of housing requirements and land availability, to building a better more diverse range of housing to serve the economic social and environmental aspirations of Scotland."*

SPP3 states that planning has a central role in meeting the Scottish Government's goal, of 35,000 new houses a year by 2015, through the identification of sufficient land to support an increased supply of the right homes in the right places.

SPP3 acknowledges that new housing developments require significant amounts of land.

There is a theme running through SPP3 that:

- there should be an allocation of a generous supply of land to meet identified housing requirements (summary);
- the national political context is strongly supportive of house building (para 5);
- an increase in the supply of housing would improve affordability in the medium term (para 5);
- The allocation of an appropriate supply of land for housing is one of the key factors in ensuring continued opportunities for house building and influencing the delivery of housing (para 9);

- authorities are to provide a supply of land suitable and available for building the required housing through the development plan (para 17);
- the Scottish Government’s desire is to see the provision of significantly more housing (para 25);
- an increased supply of land where this is required should assist the continued delivery of housing even where there are delays in building on a particular site (para 25);
- the delivery of housing through the development plan depends on sustainable, effective sites being made available to meet need and demand (para 32);
- consideration of a local authority’s wider strategic policy objectives combined with a realistic approach to the assessment of the effectiveness of sites for housing, should guide authorities to allocate more than enough land, i/e a generous supply, to help ensure delivery of homes (para 33);

This theme is a significant change from previous statements of Government policy and it in principle supports THC’s approach in allocating a “generous supply of land” in Fort William.

A related aspect of SPP3 is that it is important to have effective land; in appropriate locations; links to transport networks and other settlements; attractive and functional layouts; and good design.

We have no comments to make on the constraints of individual sites. We have noted above that the two major expansion sites in the Lochaber Local Plan, and continued in the current plan, were recognised to be constrained and they remain to be developed.

## **7. *New planning permissions***

We have no comment to make on this subject.

**Montagu Evans LLP**  
**December 2009**