

# Highland Council Inner Moray Firth Local Development Plan

## Comments received for the consultation that ended on 13th December 2013 ordered by Site

Customer Number	01716	Name	Chrissie Lacey	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Inverness - City Centre		Type	Change	Comment Late
				No	

### Comment Changes

Improvements and reconfiguration of station square

### Representation

4. On my personal wish list of developments, sooner rather than later – a circular green/garden area in station square, with the highlander statue either relocated or off-centre within the space, The ugly station entrance re-designed and parking removed from the square. I would like to see co-operation between highland council and the owners of the former macrae and dicks premises in order that the ground floor might be used for car parking (or two floors) and the upper floor for retail as at present. Entrance to car park could be from academy street and exit to Strother's Lane, or the reverse.

Allocated to	Central Inverness	General	General	
--------------	-------------------	---------	---------	--

Customer Number	04485	Name	Fraser Grieve	Organisation	Scottish Council for Development and Industry
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	IN22, IN2, IN6		Type	Support	Comment Late
				No	

### Comment Changes

### Representation

SCDI understands that decisions on the relocation of the Council HQ, Porterfield Prison, and the Sheriff Court are required before these sites could be developed, or better utilised, and would support efforts to have decisions reached on new locations for these services.

Allocated to	Central Inverness	General	General	
--------------	-------------------	---------	---------	--

Customer Number	04407	Name	F&C REIT Asset Management	Organisation	
Agent Name amd Organisation (if applicable)		Mr Andrew Woodrow		CB Richard Ellis Ltd	
Section	3.Strategy for Growth Areas		Paragraph	Paragraph 3.4	
Reference			Type	Support	Comment Late

Comment Changes

Representation

F&C supports the methods identified for achieving a consolidated and vibrant City. City Centre regeneration of brownfield land and vacant buildings is of the utmost importance to ensure that the city centre remains vibrant. Our client also welcomes the proposals for the diversification of uses, and the enhancement of civic spaces.

Allocated to	Central Inverness	General	General	
--------------	-------------------	---------	---------	--

Customer Number	00324	Name	Dr Donald Boyd	Organisation	Westhill Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.8 Central Inverness	
Reference	IN12 Harbour Road and IN13 Former Longman Landf		Type	Change	Comment Late No

Comment Changes

The introductory sentence: ‘Particularly suited to waste management facilities including an Energy from Waste facility’ is an inappropriate heading for this section and it should be deleted from the text.

Representation

Para 4.8 Central Inverness IN12 Harbour Road and IN13 Former Longman Landfill The introductory sentence: ‘Particularly suited to waste management facilities including an Energy from Waste facility’ is an inappropriate heading for this section and it should be deleted from the text. We do not oppose an energy-from-waste facility as such, but we see no reason to designate in principle any part of this area, here or elsewhere in Inverness, for an energy-from-waste facility. In the absence of information, public discussion and consultation, we object to this in the strongest possible terms. There has been no prior public consultation on this, a well-known controversial issue, with wide ranging impacts, and no business case is provided in the draft Plan. We note that the Main Issues Report Spring 2012 says at I4 that it was not recommended in the Highland-wide Local Development Plan, but Highland Council preferred it and has since adopted it into the Highland-wide Local Development Plan on 5 April 2012. We welcome the statement in the Action Programme that “the Council intends to prepare and subsequently adopt as Supplementary Guidance a development brief/framework plan for the site [IN8 & IN13], which may include the wider former landfill area”. This will provide a useful starting point for any public debate on the detailed future use of the site. In this regard, we question the proposals in the draft Plan to make more use of the Longman area for industrial purposes. We do not think that an industrial site is the best use of this site from the point of view of visual impact and landscape setting. It is central to all approach views to Inverness, from the south A9, from the Kessock Bridge, the Black Isle and the Moray Firth, as well as from Inverness itself. In addition, the Inverness-Nairn Coast Trail should not have an industrial complex as its first encounter upon leaving Inverness, although we are led to believe that the recreational and links area on the seaward side will be well-screened from the A9 landward side of the site. Prolonged gaseous dangers from landfill waste only support the need to maintain an open mind and take time to reflect upon the use of this prime location. We develop this further in our next paragraph, but careful thought should be given to the principles employed to avoid a piecemeal approach to its development. New Gateway Policy proposed As a general principle, Westhill Community Council does not think that the former Longman Landfill site is suitable as an industrial site. We believe the whole area should come under a Gateway Policy, which we believe does not currently exist. We recommend a Gateway Policy as a new, additional Policy for the Highland-wide Local Development Plan and the Inner Moray Firth Local Development Plan, taking into consideration principles applied to strategically identified Gateways to Inverness and the Highlands. Some of these principles may be contained within other policies, such as Policy 28 Sustainable Design, Policy 49 Coastal Development, Policy 56 Travel, Policy 57 Natural, Built and Cultural Heritage Policy, Policy 61 Landscape, Policy 75 Open Space, Policy 77 Public Access, Policy 78 Long Distance Routes, etc., in the Highland-wide Local Development Plan, but they are better collated under a Gateway Policy, which is not simply an Amenity Policy applicable to all situations, because it would apply to identified sites and may involved graded categories.

Allocated to	Central Inverness	General	General	
--------------	-------------------	---------	---------	--

Customer Number	04262	Name	Maggie Dove	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Site IN13 Longman Landfill	
Reference			Type	Change	Comment Late No

#### Comment Changes

The plan is not clear as to what is intended. All that is stated is "energy from waste" I am against any incinerators and hope the Council will instead consider anaerobic digestion as a viable alternative.

#### Representation

I am very much agianst an incinerator either on the Longman or in Invergordon for the following reasons:- 1 there would be pollution by wind to any areas downwind of any incinerator. Depending on wind direction this could include the Black Isle if the prevailing wind is blowing from the SW. However if there is a northerly wind then the whole of Inverness could be affected and again the Black isle if there were to be an incinerator in Invergordon. Pollution could include heavy metals, dioxins and small particles damaging the lungs. Research downwind of Incinerators both in the US and in the UK has found increases in Infant mortality , asthma and brain tumours and a reduction in IQ levels. 2 An incinerator would very likely divert material currently being recycled towards the incinerator. A much more earth friendly option would be to have an Anaerobic Digester rather than an incinerator which would be a Greener and a cheaper option.

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number	01612	Name	Ruth MacLeod	Organisation	Muirtown Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4	
Reference	IN13 Former Longman Landfill		Type	Change	Comment Late No

#### Comment Changes

Whilst not opposed to 'energy to waste' - site detailed is completely wrong for such a development.

#### Representation

Placing such a development in such a prominent part of city on the edges of the city centre is the wrong site entirely. Such plants have tendency to malfunction and would be far too intrusive. A more appropriate siting for such a plant would be around the location of Ross' Quarry, Nr Daviot - outwith the immediate city, where it would be fairly unobtrusive to the general population. We consider a more appropriate use for this site would be for use as travelling persons site, rather than IN25 as proposed.

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number	00965	Name	Mr Roger Reed	Organisation	
Agent Name amd Organisation (if applicable)					
Section	2.Guiding and Delivering Development		Paragraph	IN 13 & IN 8	
Reference	IN 13 & IN 8		Type	Change	Comment Late No

Comment Changes

I would like to see IN 13 & IN 8 combined to make one unit.

Representation

The combined areas should be considered as one green space and retained as such without further development. This area represents a pleasant green entrance to the city from north, south or east, to develop the area for any industrial use would have a detrimental impact on approaching the city. This area should be preserved as part of a green corridor around the Moray Firth. The area could be used for light recreational use at the most but not industrial use. The use of the area for siting a waste incinerator, as has been suggested, should not be considered in any way. There must be alternative sites suitable for such a purpose not at the entrance to the city. Vehicle movements, alone, to supply such a development would have severe impact on the already inadequate road system.

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number	04444	Name	Andrew Stanley	Organisation	Soudley Research
Agent Name amd Organisation (if applicable)		A Wood		Savills (UK) Limited	
Section	4.Development Allocations		Paragraph		
Reference	INV13		Type	Change	Comment Late No

Comment Changes

To add business, retail and toursim/leisure to the list of potential uses for the site

Representation

This change should ensure that the Council's proposed Supplementary Guidance can take account of a wide a range of potential mixed uses for the site to ensure that a commercially viable proposal can come forward and the Longman Landfill site remediated during the lifetime of the plan. It will also help ensure an attractive environemnt can be created on the waterfront in addition to other industrial uses within the site and allow for a more holistic aproch to be taken to the development of this area in conjuntion with proposed amendments to IN8

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number  Name  Organisation

Agent Name amd Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

Comment Changes

I am strongly opposed to an incinerator on the Longman Landfill Site

Representation

As a resident of the Black Isle I am deeply disturbed about the possibility of an incinerator being built on the Longman. There has been much debate and much scientific discussion on the pros and cons of an incinerator and I have followed events at the possible incinerator development at Invergordon very closely. The Black Isle is downwind from the proposed plant and there are genuine concerns about air quality and various forms of pollution from an incinerator. Presumably, there are as yet no details of the proposed project, but in any case one would hope that there will be detailed consultation and an inquiry before the building of an incinerator is allowed.

Allocated to

Customer Number  Name  Organisation

Agent Name amd Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

Comment Changes

Withdrawal of proposal to allow an Energy from Waste Plant on the Longman Landfill Site

Representation

As a resident of the Black Isle I am very worried about the possibility of an incinerator being built on the Longman. I have followed developments at the proposed incinerator in Invergordon very closely and have read a lot about the negative aspects of incineration. The whole Black Isle will be affected from the north by the Invergordon plant and from the south by the proposed incinerator at Inverness. There is considerable scientific evidence showing that air pollution must be seriously considered, and if an energy from waste plant were to be considered it should use an anaerobic digestion system. In any case, one would hope that there will be detailed consultation and an inquiry before the building of an incinerator is allowed.

Allocated to

Customer Number	01208	Name	Ms Anne Thomas	Organisation	Friends of the Earth Inverness
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.8	
Reference	IN13 Longman Site		Type	Change	Comment Late No

Comment Changes

Change to 'energy from waste excluding incineration'

Representation

Energy from Waste is too vague a term. I would welcome the collection of the landfill gasses to use for generating energy or an anaerobic digester but an incinerator is inappropriate and should be excluded. It would reduce the impetus to re-cycle and release pollutants such as dioxins.

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number	00965	Name	Mr Roger Reed	Organisation	
Agent Name amd Organisation (if applicable)					
Section	2.Guiding and Delivering Development		Paragraph	IN 13 & IN 8	
Reference	IN 13 & IN 8		Type	Change	Comment Late No

Comment Changes

I would like to see IN 13 & IN 8 combined to make one unit.

Representation

The combined areas should be considered as one green space and retained as such without further development. This area represents a pleasant green entrance to the city from north, south or east, to develop the area for any industrial use would have a detrimental impact on approaching the city. This area should be preserved as part of a green corridor around the Moray Firth. The area could be used for light recreational use at the most but not industrial use. The use of the area for siting a waste incinerator, as has been suggested, should not be considered in any way. There must be alternative sites suitable for such a purpose not at the entrance to the city. Vehicle movements, alone, to supply such a development would have severe impact on the already inadequate road system.

Allocated to	Central Inverness	IN13	Former Longman Landfill	
--------------	-------------------	------	-------------------------	--

Customer Number	00662	Name	Scottish Prison Service	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph		
Reference	IN 2		Type	Change	Comment Late
				No	

Comment Changes

SPS indicates support for the identification of Proposal IN2 “Porterfield Prison” for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as “Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly” it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed.

Representation

PROPOSED PLAN PROPOSAL REFERENCES: IN8 (FORMER LONGMAN LANDFILL), IN82 (ASHTON FARM AND ADJOINING LAND) AND IN2 (PORTERFIELD PRISON). Colliers International is retained by Scottish Prison Service as property and planning advisor in relation to its future estate redevelopment project concerning the provision of a new HMP Highland prison facility and any future subsequent re-use of the existing HMP Inverness facility at Porterfield, Inverness. Earlier representations were made to Highland Council’s consultation into the Inner Moray Firth Local Development Plan (IMF LDP) at the Call for Sites and the Main Issues Report stages. The most recent being to the Main Issues Report dated May 2012 where SPS made no specific reference to any development site for a future HMP Highland but did indicate that in the event of any future re-location of the existing prison facility away from Porterfield, then the existing property would become surplus to requirements and available for re-development. A further representation dated 7th August 2013 advised Council officers that progress had been made with early feasibility studies on potential development sites that may be suitable to accommodate a future HMP Highland. These feasibility studies are ongoing. Some of the early results, coupled with the site proposals identified in the IMF LDP Proposed Plan, have provided SPS with a degree of comfort to proceed with further investigations concerning a range of land use matters relevant to development in future, such as: accessibility, ground conditions and geotechnical, drainage and flood risk. This remains work in progress and is still subject to the resolution of technical and financial issues. SPS welcomes the Council’s support for accommodating a new prison within the City. Accordingly, SPS is pleased to note the Council’s broad direction of the IMF LDP Proposed Plan to accommodate the use on larger mixed use allocations where a degree of site layout masterplanning and set-back can be achieved, along with good public transport and other connections where they exist or can be created. SPS notes the Council has recognised “non-residential institutional” use possibilities for sites such as Proposal IN8 and IN82 in this regard. SPS would however wish modification to the Proposed Plan where the specific Use Class 8A “Secure residential institutions” as defined in the Town and Country Planning (Application of Subordinate Legislation to the Crown) Scotland Order 2006, which directs modification to the Town and Country Planning (Use Classes (Scotland) Order 1997 at Class 8 (residential institutions) should be inserted. For uses which apply to the Crown, it states at paragraph 16: “Use for the provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks”. Proposed modifications to the Proposed Plan are discussed further below in this context. SPS appreciates and supports the Council’s development strategy for Central Inverness as explained in the IMF LDP Proposed Plan Paragraph 4.5. SPS particularly welcomes the statement: “Central Inverness’ development options are focused on the re-use of previously developed land or reclamation. This Plan will be flexible and encouraging in terms of development proposals on vacant, underutilised, contaminated and potentially surplus sites to aid regeneration. For example, a flexible approach is offered in respect of Longman College, Cameron Barracks and Porterfield Prison to encourage efficient relocation of existing uses and quicker re-use of land and buildings which are vacated. This turnover is healthy and will allow the City to diversify its role and adapt to changing market trends and opportunities.” SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”. It is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. It is noted how the Council may produce Supplementary Guidance for the Proposal IN8 site and wider former Longman Landfill. The developer requirement statement reads” ...demonstration of



no adverse effect on the integrity of the Inner Moray Firth SPA and Ramsar as a result of disturbance to or pollution of the SPA or adjacent bird feeding and roosting areas linked to the SPA. The Council may produce Supplementary Guidance for this site and the wider, former Longman Landfill area which would be based on the same guiding principles as listed above. Flood Risk Assessment to support any planning application, this may affect the developable area”. This is considered by SPS to be a sensible approach to enable site constraints and limitations to be identified at an early stage in site layout planning. This would also assist the various indicated land uses, including for use Class 8A, to be accommodated in positions that take account of these limitations. By taking a flexible approach to the masterplanning process this can realise a series of positive outcomes – including regeneration of vacant or derelict land; remediation of land previously used as a landfill; creation of new business and community uses that bring people and new investment into the area; place making features can be planned into the site from an early stage which will enhance the setting of this visible location and allow the co-existence of compatible uses within the site. SPS would wish to work with Highland Council in the preparation of the guidance at the appropriate time. SPS indicates support for the identification of Proposal IN82 “Ashton Farm and adjoining land” for uses described as “1,300 homes, Community, Business, Industrial, Non-residential Institution”. SPS notes the Council’s recognition of acceptable uses within Proposal IN82 may include Class 10 non-residential institution. SPS wishes the statement “1,300 homes, Community, Business, Industrial, Non-residential Institution” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. SPS indicates support for the identification of Proposal IN2 “Porterfield Prison” for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as “Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly” it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed. SPS would be willing to work with Highland Council in the preparation and agreement of a developer masterplan as is indicated as a requirement for this Proposal. SPS notes the housing use stated by the Council in the Proposal IN2 should be for ‘suitable for the elderly’. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. Again the specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process. SPS notes the developer requirement to include ‘built heritage value of existing buildings’. The prison buildings are not statutorily listed, however there is a recognition of their historic value as RCAHMS (Royal Commission on the Ancient and Historical Monuments of Scotland) has recorded the buildings as having historical interest cited for being ‘Victorian prison buildings’. SPS does not consider it appropriate at this time to progress any historical listing exercise in light of the process of estate redevelopment described earlier, as this may prejudice the full potential of the redevelopment project. SPS may consider appropriate property disposal mechanisms available to it. It would be appreciated that you contact me in the event that you wish to discuss the ongoing feasibility works in progress at this stage. For instance if you require any further supporting information in relation to this consultation. Please can you acknowledge safe receipt of this submission.

Allocated to	Central Inverness	IN2	Porterfield Prison	
--------------	-------------------	-----	--------------------	--

Customer Number	00662	Name	Scottish Prison Service	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph		
Reference	IN 2		Type	Change	Comment Late
				No	

Comment Changes

SPS notes the housing use stated by the Council in the Proposal IN2 should be for ‘suitable for the elderly’. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. The specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process.

Representation

PROPOSED PLAN PROPOSAL REFERENCES: IN8 (FORMER LONGMAN LANDFILL), IN82 (ASHTON FARM AND ADJOINING LAND) AND IN2 (PORTERFIELD PRISON). Colliers International is retained by Scottish Prison Service as property and planning advisor in relation to its future estate redevelopment project concerning the provision of a new HMP Highland prison facility and any future subsequent re-use of the existing HMP Inverness facility at Porterfield, Inverness. Earlier representations were made to Highland Council’s consultation into the Inner Moray Firth Local Development Plan (IMF LDP) at the Call for Sites and the Main Issues Report stages. The most recent being to the Main Issues Report dated May 2012 where SPS made no specific reference to any development site for a future HMP Highland but did indicate that in the event of any future re-location of the existing prison facility away from Porterfield, then the existing property would become surplus to requirements and available for re-development. A further representation dated 7th August 2013 advised Council officers that progress had been made with early feasibility studies on potential development sites that may be suitable to accommodate a future HMP Highland. These feasibility studies are ongoing. Some of the early results, coupled with the site proposals identified in the IMF LDP Proposed Plan, have provided SPS with a degree of comfort to proceed with further investigations concerning a range of land use matters relevant to development in future, such as: accessibility, ground conditions and geotechnical, drainage and flood risk. This remains work in progress and is still subject to the resolution of technical and financial issues. SPS welcomes the Council’s support for accommodating a new prison within the City. Accordingly, SPS is pleased to note the Council’s broad direction of the IMF LDP Proposed Plan to accommodate the use on larger mixed use allocations where a degree of site layout masterplanning and set-back can be achieved, along with good public transport and other connections where they exist or can be created. SPS notes the Council has recognised “non-residential institutional” use possibilities for sites such as Proposal IN8 and IN82 in this regard. SPS would however wish modification to the Proposed Plan where the specific Use Class 8A “Secure residential institutions” as defined in the Town and Country Planning (Application of Subordinate Legislation to the Crown) Scotland Order 2006, which directs modification to the Town and Country Planning (Use Classes (Scotland) Order 1997 at Class 8 (residential institutions) should be inserted. For uses which apply to the Crown, it states at paragraph 16: “Use for the provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks”. Proposed modifications to the Proposed Plan are discussed further below in this context. SPS appreciates and supports the Council’s development strategy for Central Inverness as explained in the IMF LDP Proposed Plan Paragraph 4.5. SPS particularly welcomes the statement: “Central Inverness’ development options are focused on the re-use of previously developed land or reclamation. This Plan will be flexible and encouraging in terms of development proposals on vacant, underutilised, contaminated and potentially surplus sites to aid regeneration. For example, a flexible approach is offered in respect of Longman College, Cameron Barracks and Porterfield Prison to encourage efficient relocation of existing uses and quicker re-use of land and buildings which are vacated. This turnover is healthy and will allow the City to diversify its role and adapt to changing market trends and opportunities.” SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”. It is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. It is noted how the Council may produce Supplementary Guidance for the Proposal IN8 site and wider former Longman Landfill. The developer requirement statement reads” ...demonstration of no adverse effect on the integrity of the Inner Moray Firth SPA and Ramsar as a result of disturbance to or pollution of the SPA or adjacent bird feeding and roosting areas linked to the SPA. The Council may produce Supplementary Guidance for this site and the wider, former Longman Landfill area which would be based on the same guiding principles as listed above. Flood Risk

Assessment to support any planning application, this may affect the developable area". This is considered by SPS to be a sensible approach to enable site constraints and limitations to be identified at an early stage in site layout planning. This would also assist the various indicated land uses, including for use Class 8A, to be accommodated in positions that take account of these limitations. By taking a flexible approach to the masterplanning process this can realise a series of positive outcomes – including regeneration of vacant or derelict land; remediation of land previously used as a landfill; creation of new business and community uses that bring people and new investment into the area; place making features can be planned into the site from an early stage which will enhance the setting of this visible location and allow the co-existence of compatible uses within the site. SPS would wish to work with Highland Council in the preparation of the guidance at the appropriate time. SPS indicates support for the identification of Proposal IN82 "Ashton Farm and adjoining land" for uses described as "1,300 homes, Community, Business, Industrial, Non-residential Institution". SPS notes the Council's recognition of acceptable uses within Proposal IN82 may include Class 10 non-residential institution. SPS wishes the statement "1,300 homes, Community, Business, Industrial, Non-residential Institution" to be modified and expanded to include reference to Use Class 8A Secure residential institutions. SPS indicates support for the identification of Proposal IN2 "Porterfield Prison" for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as "Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly" it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed. SPS would be willing to work with Highland Council in the preparation and agreement of a developer masterplan as is indicated as a requirement for this Proposal. SPS notes the housing use stated by the Council in the Proposal IN2 should be for 'suitable for the elderly'. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. Again the specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process. SPS notes the developer requirement to include 'built heritage value of existing buildings'. The prison buildings are not statutorily listed, however there is a recognition of their historic value as RCAHMS (Royal Commission on the Ancient and Historical Monuments of Scotland) has recorded the buildings as having historical interest cited for being 'Victorian prison buildings'. SPS does not consider it appropriate at this time to progress any historical listing exercise in light of the process of estate redevelopment described earlier, as this may prejudice the full potential of the redevelopment project. SPS may consider appropriate property disposal mechanisms available to it. It would be appreciated that you contact me in the event that you wish to discuss the ongoing feasibility works in progress at this stage. For instance if you require any further supporting information in relation to this consultation. Please can you acknowledge safe receipt of this submission.

Allocated to	Central Inverness	IN2	Porterfield Prison	
--------------	-------------------	-----	--------------------	--

Customer Number	04249	Name	James Alexander	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Site(s) IN2 Porterfield Prison	
Reference	Criteria on which a capacity of 30 is based?		Type	Change	Comment Late No

#### Comment Changes

Present suggestion constitutes overdevelopment, resulting in pressure on access, utilities and general amenity of immediate surroundings and residents. Development of the prison site should be an opportunity to create a low density mixed but mainly residential city square which would enhance the Crown district in terms of townscape and quality of life. Well-designed open space in an urban context is lacking throughout the city of Inverness. The well-being (amenity, health and enjoyment) of all ages should be regarded as the priority.

#### Representation

The visual dereliction of Viewhill House and the crude alterations to the Masonic building nearby, signal the need to arrest the creeping urban detritous which is in danger of spreading in the event of unsympathetic development of the prison site. This part of Inverness is a Conservation Area and demands a sensitive approach to scale and proportion in the type of development which would replace the prison. For that reason development of the prison site should not be considered in isolation but as part of a masterplan for the surrounding area to include the aforementioned Viewhill House and the Masonic Club and car parks.

Allocated to	Central Inverness	IN2	Porterfield Prison	
--------------	-------------------	-----	--------------------	--

Customer Number	04457	Name	Virginia Macnaughton	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph	36	
Reference	IN2 Porterfield Prison		Type	Change	Comment Late No

#### Comment Changes

1. Brief to be agreed with HC Planning Dept's. Conservation Architect. 2. Widening of Adjoining roads- should not involve compulsory purchase of front gardens of adjoining properties. 3. Consideration should be given to recycling stone of walls.

#### Representation

1. Re:- Materials, terracing of houses and general conformity to existing conservation area - she is an expert. 2. These gardens are an intrinsic feature of conservation area. 3. Conservation area largely defined by 19ty red sandstone buildings. These weather & need repairing. The quarries are closed. Loss of this source irreperable.

Allocated to	Central Inverness	IN2	Porterfield Prison	
--------------	-------------------	-----	--------------------	--

Customer Number	04021	Name	Forbes Fraser	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	IN3 Hedgefield		Type	Change	Comment Late
				No	

Comment Changes

I do not wish change to the 40 homes, but I would like to plan to zone where the houses would be, rather than show the whole area as development.

Representation

In a previous version of the Local Plan some of the garden areas were marked as (I think) "presumed against development". I have no objection to 40 homes, but I would ask that the Council protect some of the garden area and woodland area. I have seen development plans for flats before and the woodland beside our house was not built on and a gap of 30 metres was maintained from our boundary. For our amenity it would be good if no houses were located close to our boundary, but the proposed development site just shows the whole area without restrictions.

Allocated to	Central Inverness	IN3	Hedgefield House	
--------------	-------------------	-----	------------------	--

Customer Number	04054	Name	Robert Preece	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	IN3		Type	Change	Comment Late
				No	

Comment Changes

The housing capacity of 40 seems excessive for this 2.3 ha of land, considering that much of the site is currently amenity woodland. Also there is a need for recognition of Hedgefield House as a former war memorial hostel, and not just as a Category B listed building.

Representation

40 houses, unless flats, would almost certainly mean the destruction of some of the woodland currently on the site; also the amount of traffic generated, and requiring access to Culduthel Road, would provide an additional hazard, even with an improved or widened gateway. At present traffic requiring access to the Mackenzie Centre, etc., or leaving the Centre, is frequently subject to vehicles travelling at excessive speeds on Culduthel Road: this led to the reinstatement, a year or so ago, of the traffic island close to the site entrance, partly in an attempt to reduce dangerous overtaking, especially of buses using the bus stops at and opposite the entrance/exit. Culduthel Road in this section consists of a series of quite short straight sections between fairly sharp curves. A major improvement of access to Muirfield Road, at the east side of the site, would also be required. Hedgefield House is also, in a sense, a War Memorial, as it was used for many years as a hostel for girl pupils from the outlying parts of the former Inverness-shire County, who were attending Inverness Royal Academy. Funding for this was provided from money collected by the Royal Academy's Old Boys' Club (as it was to become known) in 1918/1919. The hostel (originally housed in the old part of the Highland Council HQ in Ardrross Street) was moved to Hedgefield in the 1930's, when a boys' hostel was moved from Hedgefield elsewhere. The only current evidence of this former use as a War Memorial hostel is the plaque on one of the gateposts looking out onto Culduthel Road. Many years ago, this plaque replaced an arch over the gate, which had to be removed as it was too low for the entry of lorries, fire engines, and other emergency vehicles. It is to be hoped that some recognition of this War Memorial could remain as and when the site is developed. Further information on the use of Hedgefield House as a hostel can be obtained from the archivist at Inverness Royal Academy.

Allocated to	Central Inverness	IN3	Hedgefield House	
--------------	-------------------	-----	------------------	--

Customer Number	04386	Name	Anna Tozer	Organisation	Scottish Futures Trust
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	page 36	
Reference	IN4		Type	Change	Comment Late
				No	

Comment Changes

The College wishes to retain flexibility regarding potential future uses for the IN4 site and as such requests that retail (food and non food) use is specifically referred to in the list of uses in the LDP. We understand that the Council is seeking to promote mixed use development across the wider Longman Core area and consider it important that the opportunity exists for retail to be included as part of the mix of uses on the IN4 site.

Representation

Inverness College wishes to make representations on the emerging Inner Moray Firth Local Development Plan, specifically in relation to site IN4 on Longman Road. This site is currently owned and occupied by the College and will become surplus following the College’s relocation to its new facilities at Beechwood, as part of a major investment strategy in Inverness. The uses currently indicated for IN4 in the emerging Inner Moray Firth LDP are business, industrial, community and leisure. The Highland Wider LDP 2012 identifies the site as being within the “Longman Core” and makes reference to the relocation of the College to Beechwood, resulting in the potential for a wide range of different retail, commercial, business and office opportunities to be attracted to the area. It indicates that across the area the Council will support the development of office, leisure, service and retail uses and that SPG will be prepared, within which there will be an updated development brief or masterplan. The site also sits within the City Centre boundary, which allows retail uses. Several nearby sites within the “Longman Core” include reference to retail (amongst other uses) in the emerging Moray Firth LDP (e.g. IN5, IN6 and IN14). The College wishes to retain flexibility regarding potential future uses for the IN4 site and as such requests that retail (food and non food) use is specifically referred to in the list of uses for IN4 in the LDP. We understand that the Council is seeking to promote mixed use development across the wider Longman Core area and consider it important that the opportunity exists for retail to be included as part of the mix of uses on the IN4 site. We trust that these comments will be taken on board and that their substance will be given effect in the emerging Local Development Plan.

Allocated to	Central Inverness	IN4	Land at Inverness College	
--------------	-------------------	-----	---------------------------	--

Customer Number	04320	Name	Niall McArthur	Organisation	Inverness College
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	page 36	
Reference	IN4		Type	Change	Comment Late No

#### Comment Changes

The College wishes to retain flexibility regarding potential future uses for the IN4 site and as such requests that retail (food and non food) use is specifically referred to in the list of uses in the LDP. We understand that the Council is seeking to promote mixed use development across the wider Longman Core area and consider it important that the opportunity exists for retail to be included as part of the mix of uses on the IN4 site.

#### Representation

Inverness College wishes to make representations on the emerging Inner Moray Firth Local Development Plan, specifically in relation to site IN4 on Longman Road. This site is currently owned and occupied by the College and will become surplus following the College's relocation to its new facilities at Beechwood, as part of a major investment strategy in Inverness. The uses currently indicated for IN4 in the emerging Inner Moray Firth LDP are business, industrial, community and leisure. The Highland Wider LDP 2012 identifies the site as being within the "Longman Core" and makes reference to the relocation of the College to Beechwood, resulting in the potential for a wide range of different retail, commercial, business and office opportunities to be attracted to the area. It indicates that across the area the Council will support the development of office, leisure, service and retail uses and that SPG will be prepared, within which there will be an updated development brief or masterplan. The site also sits within the City Centre boundary, which allows retail uses. Several nearby sites within the "Longman Core" include reference to retail (amongst other uses) in the emerging Moray Firth LDP (e.g. IN5, IN6 and IN14). The College wishes to retain flexibility regarding potential future uses for the IN4 site and as such requests that retail (food and non food) use is specifically referred to in the list of uses for IN4 in the LDP. We understand that the Council is seeking to promote mixed use development across the wider Longman Core area and consider it important that the opportunity exists for retail to be included as part of the mix of uses on the IN4 site. We trust that these comments will be taken on board and that their substance will be given effect in the emerging Local Development Plan.

Allocated to	Central Inverness	IN4	Land at Inverness College	
--------------	-------------------	-----	---------------------------	--

Customer Number	04249	Name	James Alexander	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	IN 6	
Reference	The Town House		Type	Change	Comment Late No

#### Comment Changes

Clarification of inclusion of the Town House building within IN6

#### Representation

My reason is that the area may have been incuded erroneously

Allocated to	Central Inverness	IN6	Bridge St	
--------------	-------------------	-----	-----------	--



Customer Number 00304 Name Michael W Gimson Organisation Lochardil And Drummond Community Council

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Cameron Barracks

Reference IN7 Type Change Comment Late No

Comment Changes

Reduction in development proposals.

Representation

The Cameron Barracks was built between 1880and 1886 and has a significant history in the eyes of the public. Any development on this site should not remove the parade square, now laid in grass. This sets the scene for the Listed Barracks buildings, and development of the site would harm the buildings and remove a tourist attraction.

Allocated to Central Inverness IN7 Cameron Barracks

Customer Number 03156 Name MR Mark Limbrick Organisation Defence Infrastructure Organisation

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph

Reference IN7 Type Change Comment Late No

Comment Changes

There is an ongoing military requirement for retention of the Cameron Barracks site for at least the next five years. Any change in the status of the site will be subject to a review as part of ongoing wider basing optimisation studies.

Representation

Inner Moray Firth Local Development Plan Central Inverness Proposal IN7 - Cameron Barracks Representation on Behalf of the Ministry of Defence (MOD) by the Defence Infrastructure Organisation (DIO). 1. MOD notes the policy approach to the regeneration of Central Inverness and the focus on the re-use of previously developed land. The MOD welcomes the flexible and encouraging stance adopted by the Plan in terms of development proposal for potentially surplus sites, including land at Cameron Barracks. 2. The MOD notes the identification of the Cameron Barracks site for mixed use development (Site IN7) of 7 hectares, accommodating business uses, up to 65 houses as well as potentially community and tourism uses. MOD notes that to facilitate development the Council will require a master plan or development brief for the site which deals with the impact on listed buildings; the impact of any proposed development on mature woodland and includes retention of both existing access routes including the traffic signalled controlled junction on New Perth Road. 3. The current primary use for Cameron Barracks is that of training establishment for regular and TA units embarking on training exercises across the Highlands. It accommodates a number of support staff in particular those associated with the Fort George Ranges. There are some 300 bed spaces, messing facilities, a laser range, assembly room, canteen and sports pitch. In essence, the site provides a facilities hub for training and is the springboard for units accessing training across the Highlands. 4. In relation to the Army Reserves the Barracks are used by the TA and Cadets (based at the Gordonville Road Centre) in part as a training base. At present this is an ongoing requirement. 5. The site also provides accommodation for Facilities Management Contractors as well as hosting IT facilities for the area. Conclusion 6. There is an ongoing military requirement for retention of the Cameron Barracks site for at least the next five years. Any change in the status of the site will be subject to a review as part of ongoing wider basing optimisation studies.

Allocated to Central Inverness IN7 Cameron Barracks

Customer Number 04353 Name Maria de la Torre Organisation On behalf of Lochardil and Drummond Community Council

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph

Reference IN7 Cameron Barracks Type Change Comment Late No

Comment Changes

Reduction in development proposals

Representation

The Cameron Barracks was built between 1880and 1886 and has a significant history in the eyes of the public. Any development on this site should not remove the parade square, now laid in grass. This sets the scene for the Listed Barracks buildings,.and development of the site would harm the buildings and remove a tourist attraction

Allocated to Central Inverness IN7 Cameron Barracks

Customer Number	00662	Name	Scottish Prison Service	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph		
Reference	IN 8		Type	Change	Comment Late No

Comment Changes

In the "Requirements" section of Proposal IN 8, it is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions.

Representation

Colliers International is retained by Scottish Prison Service as property and planning advisor in relation to its future estate redevelopment project concerning the provision of a new HMP Highland prison facility and any future subsequent re-use of the existing HMP Inverness facility at Porterfield, Inverness. Earlier representations were made to Highland Council’s consultation into the Inner Moray Firth Local Development Plan (IMF LDP) at the Call for Sites and the Main Issues Report stages. The most recent being to the Main Issues Report dated May 2012 where SPS made no specific reference to any development site for a future HMP Highland but did indicate that in the event of any future re-location of the existing prison facility away from Porterfield, then the existing property would become surplus to requirements and available for re-development. A further representation dated 7th August 2013 advised Council officers that progress had been made with early feasibility studies on potential development sites that may be suitable to accommodate a future HMP Highland. These feasibility studies are ongoing. Some of the early results, coupled with the site proposals identified in the IMF LDP Proposed Plan, have provided SPS with a degree of comfort to proceed with further investigations concerning a range of land use matters relevant to development in future, such as: accessibility, ground conditions and geotechnical, drainage and flood risk. This remains work in progress and is still subject to the resolution of technical and financial issues. SPS welcomes the Council’s support for accommodating a new prison within the City. Accordingly, SPS is pleased to note the Council’s broad direction of the IMF LDP Proposed Plan to accommodate the use on larger mixed use allocations where a degree of site layout masterplanning and set-back can be achieved, along with good public transport and other connections where they exist or can be created. SPS notes the Council has recognised “non-residential institutional” use possibilities for sites such as Proposal IN8 and IN82 in this regard. SPS would however wish modification to the Proposed Plan where the specific Use Class 8A “Secure residential institutions” as defined in the Town and Country Planning (Application of Subordinate Legislation to the Crown) Scotland Order 2006, which directs modification to the Town and Country Planning (Use Classes (Scotland) Order 1997 at Class 8 (residential institutions) should be inserted. For uses which apply to the Crown, it states at paragraph 16: “Use for the provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks”. Proposed modifications to the Proposed Plan are discussed further below in this context. SPS appreciates and supports the Council’s development strategy for Central Inverness as explained in the IMF LDP Proposed Plan Paragraph 4.5. SPS particularly welcomes the statement: “Central Inverness’ development options are focused on the re-use of previously developed land or reclamation. This Plan will be flexible and encouraging in terms of development proposals on vacant, underutilised, contaminated and potentially surplus sites to aid regeneration. For example, a flexible approach is offered in respect of Longman College, Cameron Barracks and Porterfield Prison to encourage efficient relocation of existing uses and quicker re-use of land and buildings which are vacated. This turnover is healthy and will allow the City to diversify its role and adapt to changing market trends and opportunities.” SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”. It is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. It is noted how the Council may produce Supplementary Guidance for the Proposal IN8 site and wider former Longman Landfill. The developer requirement statement reads” ...demonstration of no adverse effect on the integrity of the Inner Moray Firth SPA and Ramsar as a result of disturbance to or pollution of the SPA or adjacent bird feeding and roosting areas linked to the SPA. The Council may produce Supplementary Guidance for this site and the wider, former Longman Landfill area which would be based on the same guiding principles as listed above. Flood Risk Assessment to support any planning application, this may affect the developable area”. This is considered by SPS to be a sensible approach to enable site constraints

and limitations to be identified at an early stage in site layout planning. This would also assist the various indicated land uses, including for use Class 8A, to be accommodated in positions that take account of these limitations. By taking a flexible approach to the masterplanning process this can realise a series of positive outcomes – including regeneration of vacant or derelict land; remediation of land previously used as a landfill; creation of new business and community uses that bring people and new investment into the area; place making features can be planned into the site from an early stage which will enhance the setting of this visible location and allow the co-existence of compatible uses within the site. SPS would wish to work with Highland Council in the preparation of the guidance at the appropriate time. SPS indicates support for the identification of Proposal IN82 “Ashton Farm and adjoining land” for uses described as “1,300 homes, Community, Business, Industrial, Non-residential Institution”. SPS notes the Council’s recognition of acceptable uses within Proposal IN82 may include Class 10 non-residential institution. SPS wishes the statement “1,300 homes, Community, Business, Industrial, Non-residential Institution” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. SPS indicates support for the identification of Proposal IN2 “Porterfield Prison” for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as “Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly” it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed. SPS would be willing to work with Highland Council in the preparation and agreement of a developer masterplan as is indicated as a requirement for this Proposal. SPS notes the housing use stated by the Council in the Proposal IN2 should be for ‘suitable for the elderly’. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. Again the specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process. SPS notes the developer requirement to include ‘built heritage value of existing buildings’. The prison buildings are not statutorily listed, however there is a recognition of their historic value as RCAHMS (Royal Commission on the Ancient and Historical Monuments of Scotland) has recorded the buildings as having historical interest cited for being ‘Victorian prison buildings’. SPS does not consider it appropriate at this time to progress any historical listing exercise in light of the process of estate redevelopment described earlier, as this may prejudice the full potential of the redevelopment project. SPS may consider appropriate property disposal mechanisms available to it. It would be appreciated that you contact me in the event that you wish to discuss the ongoing feasibility works in progress at this stage. For instance if you require any further supporting information in relation to this consultation

Allocated to	Central Inverness	IN8	Former Longman Landfill	
--------------	-------------------	-----	-------------------------	--

Customer Number	00662	Name	Scottish Prison Service	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph	4.5	
Reference			Type	Support	Comment Late
				No	

Comment Changes

Representation

Colliers International is retained by Scottish Prison Service as property and planning advisor in relation to its future estate redevelopment project concerning the provision of a new HMP Highland prison facility and any future subsequent re-use of the existing HMP Inverness facility at Porterfield, Inverness. Earlier representations were made to Highland Council’s consultation into the Inner Moray Firth Local Development Plan (IMF LDP) at the Call for Sites and the Main Issues Report stages. The most recent being to the Main Issues Report dated May 2012 where SPS made no specific reference to any development site for a future HMP Highland but did indicate that in the event of any future re-location of the existing prison facility away from Porterfield, then the existing property would become surplus to requirements and available for re-development. A further representation dated 7th August 2013 advised Council officers that progress had been made with early feasibility studies on potential development sites that may be suitable to accommodate a future HMP Highland. These feasibility studies are ongoing. Some of the early results, coupled with the site proposals identified in the IMF LDP Proposed Plan, have provided SPS with a degree of comfort to proceed with further investigations concerning a range of land use matters relevant to development in future, such as: accessibility, ground conditions and geotechnical, drainage and flood risk. This remains work in progress and is still subject to the resolution of technical and financial issues. SPS welcomes the Council’s support for accommodating a new prison within the City. Accordingly, SPS is pleased to note the Council’s broad direction of the IMF LDP Proposed Plan to accommodate the use on larger mixed use allocations where a degree of site layout masterplanning and set-back can be achieved, along with good public transport and other connections where they exist or can be created. SPS notes the Council has recognised “non-residential institutional” use possibilities for sites such as Proposal IN8 and IN82 in this regard. SPS would however wish modification to the Proposed Plan where the specific Use Class 8A “Secure residential institutions” as defined in the Town and Country Planning (Application of Subordinate Legislation to the Crown) Scotland Order 2006, which directs modification to the Town and Country Planning (Use Classes (Scotland) Order 1997 at Class 8 (residential institutions) should be inserted. For uses which apply to the Crown, it states at paragraph 16: “Use for the provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks”. Proposed modifications to the Proposed Plan are discussed further below in this context. SPS appreciates and supports the Council’s development strategy for Central Inverness as explained in the IMF LDP Proposed Plan Paragraph 4.5. SPS particularly welcomes the statement: “Central Inverness’ development options are focused on the re-use of previously developed land or reclamation. This Plan will be flexible and encouraging in terms of development proposals on vacant, underutilised, contaminated and potentially surplus sites to aid regeneration. For example, a flexible approach is offered in respect of Longman College, Cameron Barracks and Porterfield Prison to encourage efficient relocation of existing uses and quicker re-use of land and buildings which are vacated. This turnover is healthy and will allow the City to diversify its role and adapt to changing market trends and opportunities.” SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”. It is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. It is noted how the Council may produce Supplementary Guidance for the Proposal IN8 site and wider former Longman Landfill. The developer requirement statement reads” ...demonstration of no adverse effect on the integrity of the Inner Moray Firth SPA and Ramsar as a result of disturbance to or pollution of the SPA or adjacent bird feeding and roosting areas linked to the SPA. The Council may produce Supplementary Guidance for this site and the wider, former Longman Landfill area which would be based on the same guiding principles as listed above. Flood Risk Assessment to support any planning application, this may affect the developable area”. This is considered by SPS to be a sensible approach to enable site constraints and limitations to be identified at an early stage in site layout planning. This would also assist the various indicated land uses, including for use Class 8A, to be accommodated in positions that take account of these limitations. By taking a flexible approach to the masterplanning process this can realise a series of positive outcomes – including regeneration of vacant or derelict land; remediation of land previously used as a landfill; creation of new business and community uses that bring people and new investment into the area; place making features can be planned into

the site from an early stage which will enhance the setting of this visible location and allow the co-existence of compatible uses within the site. SPS would wish to work with Highland Council in the preparation of the guidance at the appropriate time. SPS indicates support for the identification of Proposal IN82 “Ashton Farm and adjoining land” for uses described as “1,300 homes, Community, Business, Industrial, Non-residential Institution”. SPS notes the Council’s recognition of acceptable uses within Proposal IN82 may include Class 10 non-residential institution. SPS wishes the statement “1,300 homes, Community, Business, Industrial, Non-residential Institution” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. SPS indicates support for the identification of Proposal IN2 “Porterfield Prison” for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as “Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly” it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed. SPS would be willing to work with Highland Council in the preparation and agreement of a developer masterplan as is indicated as a requirement for this Proposal. SPS notes the housing use stated by the Council in the Proposal IN2 should be for ‘suitable for the elderly’. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. Again the specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process. SPS notes the developer requirement to include ‘built heritage value of existing buildings’. The prison buildings are not statutorily listed, however there is a recognition of their historic value as RCAHMS (Royal Commission on the Ancient and Historical Monuments of Scotland) has recorded the buildings as having historical interest cited for being ‘Victorian prison buildings’. SPS does not consider it appropriate at this time to progress any historical listing exercise in light of the process of estate redevelopment described earlier, as this may prejudice the full potential of the redevelopment project. SPS may consider appropriate property disposal mechanisms available to it. It would be appreciated that you contact me in the event that you wish to discuss the ongoing feasibility works in progress at this stage. For instance if you require any further supporting information in relation to this consultation. Please can you acknowledge safe receipt of this submission.

Allocated to	Central Inverness	IN8	Former Longman Landfill	
--------------	-------------------	-----	-------------------------	--

Customer Number	00662	Name	Scottish Prison Service	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph		
Reference	IN 8		Type	Change	Comment Late
				No	

### Comment Changes

SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”.

### Representation

Colliers International is retained by Scottish Prison Service as property and planning advisor in relation to its future estate redevelopment project concerning the provision of a new HMP Highland prison facility and any future subsequent re-use of the existing HMP Inverness facility at Porterfield, Inverness. Earlier representations were made to Highland Council’s consultation into the Inner Moray Firth Local Development Plan (IMF LDP) at the Call for Sites and the Main Issues Report stages. The most recent being to the Main Issues Report dated May 2012 where SPS made no specific reference to any development site for a future HMP Highland but did indicate that in the event of any future re-location of the existing prison facility away from Porterfield, then the existing property would become surplus to requirements and available for re-development. A further representation dated 7th August 2013 advised Council officers that progress had been made with early feasibility studies on potential development sites that may be suitable to accommodate a future HMP Highland. These feasibility studies are ongoing. Some of the early results, coupled with the site proposals identified in the IMF LDP Proposed Plan, have provided SPS with a degree of comfort to proceed with further investigations concerning a range of land use matters relevant to development in future, such as: accessibility, ground conditions and geotechnical, drainage and flood risk. This remains work in progress and is still subject to the resolution of technical and financial issues. SPS welcomes the Council’s support for accommodating a new prison within the City. Accordingly, SPS is pleased to note the Council’s broad direction of the IMF LDP Proposed Plan to accommodate the use on larger mixed use allocations where a degree of site layout masterplanning and set-back can be achieved, along with good public transport and other connections where they exist or can be created. SPS notes the Council has recognised “non-residential institutional” use possibilities for sites such as Proposal IN8 and IN82 in this regard. SPS would however wish modification to the Proposed Plan where the specific Use Class 8A “Secure residential institutions” as defined in the Town and Country Planning (Application of Subordinate Legislation to the Crown) Scotland Order 2006, which directs modification to the Town and Country Planning (Use Classes (Scotland) Order 1997 at Class 8 (residential institutions) should be inserted. For uses which apply to the Crown, it states at paragraph 16: “Use for the provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks”. Proposed modifications to the Proposed Plan are discussed further below in this context. SPS appreciates and supports the Council’s development strategy for Central Inverness as explained in the IMF LDP Proposed Plan Paragraph 4.5. SPS particularly welcomes the statement: “Central Inverness’ development options are focused on the re-use of previously developed land or reclamation. This Plan will be flexible and encouraging in terms of development proposals on vacant, underutilised, contaminated and potentially surplus sites to aid regeneration. For example, a flexible approach is offered in respect of Longman College, Cameron Barracks and Porterfield Prison to encourage efficient relocation of existing uses and quicker re-use of land and buildings which are vacated. This turnover is healthy and will allow the City to diversify its role and adapt to changing market trends and opportunities.” SPS indicates support for the identification of Proposal IN8 “Former Longman Landfill” for uses described as “Business, Industrial, Non-residential institutional, Temporary Stop Site for Travellers”. It is acknowledged that these uses could be suitably combined to provide a mixed development and that each use is compatible with each other to enable co-existence on the re-generated Longman site. However, SPS suggests the list of acceptable uses be modified and expanded to include “Class 8A Secure residential institutions”. It is noted and supported by SPS that the Council will require developers of Proposal IN8 to prepare a “Developer masterplan to incorporate/address: woodland retention to provide wind stable tree belt depth and visual screen to A9; suitable for Class 4, 5, 6 and 10 uses only. SPS wishes the statement “suitable for Class 4,5 6 and 10 uses only” to be modified and expanded to include reference to Use Class 8A Secure residential institutions. It is noted how the Council may produce Supplementary Guidance for the Proposal IN8 site and wider former Longman Landfill. The developer requirement statement reads”...demonstration of no adverse effect on the integrity of the Inner Moray Firth SPA and Ramsar as a result of disturbance to or pollution of the SPA or adjacent bird feeding and roosting areas linked to the SPA. The Council may produce Supplementary Guidance for this site and the wider, former Longman Landfill area which would be based on the same guiding principles as

listed above. Flood Risk Assessment to support any planning application, this may affect the developable area". This is considered by SPS to be a sensible approach to enable site constraints and limitations to be identified at an early stage in site layout planning. This would also assist the various indicated land uses, including for use Class 8A, to be accommodated in positions that take account of these limitations. By taking a flexible approach to the masterplanning process this can realise a series of positive outcomes – including regeneration of vacant or derelict land; remediation of land previously used as a landfill; creation of new business and community uses that bring people and new investment into the area; place making features can be planned into the site from an early stage which will enhance the setting of this visible location and allow the co-existence of compatible uses within the site. SPS would wish to work with Highland Council in the preparation of the guidance at the appropriate time. SPS indicates support for the identification of Proposal IN82 "Ashton Farm and adjoining land" for uses described as "1,300 homes, Community, Business, Industrial, Non-residential Institution". SPS notes the Council's recognition of acceptable uses within Proposal IN82 may include Class 10 non-residential institution. SPS wishes the statement "1,300 homes, Community, Business, Industrial, Non-residential Institution" to be modified and expanded to include reference to Use Class 8A Secure residential institutions. SPS indicates support for the identification of Proposal IN2 "Porterfield Prison" for housing use in principle. However the proposed indicative capacity of 30 units is not supported. At this early stage, SPS would prefer no specified capacity for the site and thus the Proposal IN2 should be modified to reflect this position. As the developer requirements sought by the Council are described in Proposal IN2 as "Developer masterplan to address: need for widening of adjoining roads, footways and service vehicle access; possible left in/out access from Old Edinburgh Road; built heritage value of existing buildings; accommodation suitable for the elderly" it is believed it will be more appropriate for a site capacity to evolve from that process, once all site specific matters are understood and addressed. SPS would be willing to work with Highland Council in the preparation and agreement of a developer masterplan as is indicated as a requirement for this Proposal. SPS notes the housing use stated by the Council in the Proposal IN2 should be for 'suitable for the elderly'. Whilst this is a logical aspiration in recognition of the future housing needs for this sector of the population, the Proposal IN2 should remain as a broad housing allocation for a range of potential types of occupier and not one specific type as stated currently. Again the specific type of use can be determined at a later date, possibly as part of the required Developer masterplan process. SPS notes the developer requirement to include 'built heritage value of existing buildings'. The prison buildings are not statutorily listed, however there is a recognition of their historic value as RCAHMS (Royal Commission on the Ancient and Historical Monuments of Scotland) has recorded the buildings as having historical interest cited for being 'Victorian prison buildings'. SPS does not consider it appropriate at this time to progress any historical listing exercise in light of the process of estate redevelopment described earlier, as this may prejudice the full potential of the redevelopment project. SPS may consider appropriate property disposal mechanisms available to it. It would be appreciated that you contact me in the event that you wish to discuss the ongoing feasibility works in progress at this stage. For instance if you require any further supporting information in relation to this consultation. Please can you acknowledge safe receipt of this submission.

Allocated to	Central Inverness	IN8	Former Longman Landfill	
--------------	-------------------	-----	-------------------------	--

Customer Number	04444	Name	Andrew Stanley	Organisation	Soudley Research
-----------------	-------	------	----------------	--------------	------------------

Agent Name amd Organisation (if applicable)	A Wood	Savills (UK) Limited
---	--------	----------------------

Section	4.Development Allocations	Paragraph	
---------	---------------------------	-----------	--

Reference	IN8	Type	Change	Comment Late	No
-----------	-----	------	--------	--------------	----

Comment Changes

To add retail and tourism and leisure uses to the list of potential uses
--

Representation

This change should ensure that the Council's proposed Supplementary Guidance can take account of a wide a range of potential mixed uses for the site to ensure that a commercially viable proposal can come forward and the Longman Landfill site remediated during the lifetime of the plan. It will also help ensure an attractive environemnt can be created on the waterfront in addition to other business uses within the site.

Allocated to	Central Inverness	IN8	Former Longman Landfill	
--------------	-------------------	-----	-------------------------	--



Customer Number	01196	Name	Inverness Harbour Trust	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	IN9		Type	Change	Comment Late No

### Comment Changes

Site: IN9 “Land at Inverness Waterfront; Area (ha): 29.0; Uses: tourism, retail, leisure, business, residential and harbour uses Requirements: scale, composition and extent of development to be determined by a masterplan to be informed by appropriate engineering, conservation, environmental and market evidence as required to satisfy statutory requirements”. The Proposals Map should be adjusted accordingly as attached. Corresponding changes to the Inverness to Nairn Growth Area “vision” and “strategy”, viz. at para. 3.1 (second bullet) add “Inverness waterfront”; and at para. 3.5 (a third bullet) add “allocations of land for new jobs and houses, including by transforming Inverness waterfront into a vibrant mixed-use urban quarter as a new place for living, work and leisure able to deliver strategic economic development”.

### Representation

Grounds of Objection 1.The proposal for a mixed use waterfront development embraces the long term planning aspirations of IHT. The Trust wishes to investigate the market potential that will underpin future expansion - to do so now - and to address comprehensively and on an integrated basis, the potential for future development of: •port operations that would embrace a regional transport gateway, efficient harbour expansion/reconfiguration and market potential in the cruise-ship sector (partly located seaward of the Kessock Bridge) and enabled by a Harbour Revision Order; and the •tourism - hotel/marina-visitor based - business sector supported by urban scale, mixed use development and a vibrant waterfront quarter that would create “place” and thus give impetus to property investment and delivery of those leisure streams recognized in the HWLDP. 2.These proposals are unique to a waterfront position, almost 2km of land and foreshore; 29.0 ha., 1km from the city centre. This is not the view of IHT, but of the Council itself and its economic agency partners in the approved Inner Moray Firth Major Ports & Sites Strategy (IMFMP&SS) in 2006, viz. “Pressures to develop other sectors of the large Inverness Waterfront for housing, leisure and commercial uses are expected to gather pace over the next decade. The city has a variety of ...locations where market pressures and rising land values will eventually promote intensive property schemes...”. It is incumbent on the development plan seek to harness that potential and begin to facilitate full and proper investigation of it. 3.IHT seek the allocation of its estate (east of the River Ness) with appropriate policy securing its objectives for urban development and harbour expansion and which begins to deliver the IMFMPSS and implicit in the vision of the Highland-wide Local Development Plan. 4.The Reporter(s) are invited to read this objection with - and in light of - the undernoted documents including the full MIR representation as set out below. This objection also focuses on the Schedule 4 response. Proposal 5.The PLDP restricts development to less than half of the IHT estate, restricts the uses and thus the viability of a proposal, is presumptuous of the environmental effects and of a process that requires demonstration of acceptable impacts. It ignores the benefits to the regional economy, the city’s capacity for business and tourism and the mixed-use principles sustaining waterfront development elsewhere. 6.IHT has long held plans to expand its leisure/tourism assets - hotel, business, marina, heritage centre and supporting facilities. However, significant investment is discouraged by the industrial setting; and viability is dependent on creating “place”. That can happen if there is confidence that Inverness waterfront is to be transformed; is to contain the right mix of uses and is to achieve the right scale of development. There is potential to create a spectacular cityscape, unique to the Highland capital, its outstanding location and international appeal. 8.“The vision is to create a vibrant quayside waterfront quarter, a new place for living, working and leisure based on a composition of high density development, transforming the city’s waterfront, its profile and image. Mixed housing, offices, hotels and conference facilities; a leisure hub of national visitor centre, tourist shops, entertainments, bars, eating places at quayside level around the centre-piece: an expanded marina and canal. Streets and spaces, a park and promenade; iconic architecture and engineering: a pedestrian bridge of the Ness ... essential waterfront development, of its place, connecting the outstanding marine heritage ... a natural gateway”. 9.There appears to be no record that this vision and concept has been considered by the PED Committee or reported in the Summary of Comments Received. This is a strategic development proposal and the planning authority is obliged to have given it consideration. 10.The proposal amalgamates the statutory functions of IHT and its responsibilities for harbour development for which it would obtain a Harbour Revision Order; and the land use planning purpose of the development plan. These would fuse together harbour and urban development; co-dependent on land engineering/reclamation, compatible uses and activities, and facilitated through comprehensive planning of the IHT estate. 11.However, neither, the evidence base, the masterplanning, the market appraisal nor the structural works can proceed piecemeal, because these are fundamental to the extent of development, the layout of activities, feasibility and costs. Development will be phased as the market responds; but the core planning implications must be addressed comprehensively. 12.That would be the purpose of the “whole” allocation the IHT seeks. The PLDP cannot afford to regard the proposal in 5-year chunks or as a development that will occur short term and in isolation of wider changes around and about. The role of the development plan is to begin to enable the

proposal to be fully investigated for its environmental effects, development potential and viability. The development plan needs to respond accordingly. Strategy 13. Further to the IMFMP&SS (2006), the IMFLDP should be facilitating and implementing that strategy. The proposal would bring a new dimension to the regional economy, re-profile Inverness waterfront and regenerate the City. The waterfront is pivotal to three identified regeneration sites (Longman, Longman-College and Merkinch and therefore serves the declared regeneration strategy for the City. Principles 15. The PLDP does not reflect an understanding of the engineering feasibility, market viability or planning design protocol that are the physical and commercial underpinnings of the proposal; or the statutory prerequisites that would inform it. The IMFLDP must recognise that all of the IHT estate could have development potential and the more that is maximized, the greater the prospects of a mixed-use waterfront proposal being viable. 16. Notwithstanding, that potential must be proven; for it to be proven it must be fully investigated; and for it to be fully investigated, the IMFLDP must give certainty that if it is proven but only if it is proven, it would be consistent with the development plan, and development could then, subject to planning permission, proceed. It is the evidence that will determine the scale, composition and mix of uses that is sufficiently attractive to the market for development to go ahead. 17. The PLDP is presumptuous and premature in the allocation it makes; the planning authority does not have the evidence base on which to make the judgment it has. The effect of the PLDP is to curtail waterfront development; and make it less likely to happen. In responding that "...Future development plans will consider favourably further allocations if this initial phase is seen as a success in regenerating the waterfront..." it accepts the principle of a more expansive development, but its approach stymies that prospect. Status and Jurisdiction 18. The IHT is entitled to apply for a Harbour Revision Order in relation to the subjects it owns. The development plan ought to recognize that as development potential. The Inverness Culloden and Ardersier Local Plan (1997) did, safeguarding land and foreshore akin to the subject of this objection for the long term. The IHT was granted a Harbour Revision Order for reclamation of back-up land, new quayside and a marina, completed in 2009. That was reflected in the Inverness Local Plan. The same fundamental proposition arises for the IMFLDP ie. harbour expansion and mixed uses, except this proposal concerns more land, a longer timescale and an optimum view of the IHT estate. That approach to planning should be commended and facilitated. 19. The IHT is not bound by any prescribed restrictions on the scale or composition of development. The commercial operation of the harbour - its development potential - would span a wide range and mix of potential uses. Any competent Harbour Trust would be looking long term at its assets and to move forward with the development plan. Environmental Effects 20. It is not possible by law to undermine or circumvent the statutory provisions that govern environmental safeguards; whether these relate to flooding/flood risk or nature conservation or other compatibility issues. Full and proper consideration of all environmental impacts will be a prerequisite and a secure foundation for any proposal; and amongst the core masterplanning inputs. 21. The requirement to satisfy European and UK law is absolute; any development proposal must demonstrate that; and planning permission or any other consent would not be forthcoming without it. The PLDP does not offer any greater security against risk of the environmental effects of development than would be the case had it allocated the full extent of the IHT estate; but having not allocated the estate in full, that does diminish the prospects of development proceeding. 22. The planning authority has no evidence on which to base its judgment about acceptable level of risk; but it has taken an uninformed view about the extent of IN9. This was specifically raised in MIR representations (see below). The objection would pre-empt or prejudice no outcome. It is precisely what the policy 57 etc. of the HWLDP prescribes. The planning authority must apply the same principles to the development plan. The planning authority's view that "there are too many environmental risks in writing a blank cheque for foreshore development in this area..." is indicative of a proposal and a process, completely misunderstood. Engineering Feasibility 23. The planning authority states "...Future development plans will consider favourably further allocations if this initial phase is seen as a success in regenerating the waterfront"... It is not viable to add-on a later seaward phase of development because a second (duplicated) sea-wall or similar perimeter defense is a completely impractical proposition in engineering and cost terms (see A F Cruden Associates below). Residential 24. As a core property component, residential development is essential to achieving a critical mass of buildings and people at a scale needed to "make a place", and thus present an attractive investment proposition and enhance the prospects of delivering the "leisure and tourist uses of high quality architectural design etc. that gains a competitive advantage from a waterfront location" that are appropriate. As it stands the PLDP is not sufficiently ambitious or accommodating. It must foster the same mix of uses that have sustained urban waterfront regeneration across the UK and world-wide over the last twenty-five years. That scenario underpinned the view of A+DS (below). 25. The planning system does not regulate residential development by age of occupancy; but the massing of development needed to "create the place", would demand higher density building - stacked flats - rather than conventional family homes; which are amply provided for on expansion sites throughout the PLDP. The mix of development envisioned for the waterfront is unique to its purpose and location. 26. Enhanced pedestrian/cyclist corridors, links to facilities and a promenade into the city centre would attach to a major waterfront development, facilitated in large part by IHT itself. It owns 50% of the intervening waterfront to the edge of the city centre and the rest could readily provide for continuity of routes as redevelopment proceeds. The waterfront is no further from its schools than the resident urban catchment population; children would not reasonably make such a journey unaccompanied; safer routes and "green transport" would be included and a pedestrian crossing of the Ness would improve proximity to Merkinch primary school. Facilities 27. Development could support community facilities - a hall or similar accommodation; a neighbourhood shop and public transport services. The planning authority could seek to condition such provisions. The viability of facilities is assisted by neighbouring large scale employment; and established facilities primary school, health facilities are within 1.5 km. 28. The waterfront proposals are being fitted into the structure of the city driven by the opportunity for economic regeneration, regional strategy and the advantage that derives from a gateway position, critical mass, proximity to the city centre and the waterfront. Those are invariably the factors that deliver the mix of uses needed to transform Inverness Waterfront. The proposal fits the PDL objective (para. 3.1) "a consolidated city acting as the larger and more efficient engine to drive forward the wider Highland economy. Recommendation as above

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
Customer Number	04407	Name	F&C REIT Asset Management	Organisation
Agent Name amd Organisation (if applicable)	Mr Andrew Woodrow		CB Richard Ellis Ltd	
Section	4.Development Allocations		Paragraph	
Reference	Site IN9 Land to south and east of Inverness Harbo		Type	Change
			Comment Late	No

Comment Changes

We would also propose introducing wording to further protect the high street. In this regard, the description of the appropriate Retail/Leisure uses should read as follows:  
 \*Retail/Leisure uses that are focused on the tourism sector and/or, those uses that gain a competitive advantage from (or are particularly suited to) a waterfront location. For example, a dine-in restaurant would be acceptable, a bulky goods warehouse, large foodstore or high street retailer would not. The changing in wording is to ensure that the City Centre continues to receive the protection it requires.

Representation

We would also propose introducing wording to further protect the high street. In this regard, the description of the appropriate Retail/Leisure uses should read as follows: \*Retail/Leisure uses that are focused on the tourism sector and/or, those uses that gain a competitive advantage from (or are particularly suited to) a waterfront location. For example, a dine-in restaurant would be acceptable, a bulky goods warehouse, large foodstore or high street retailer would not. The changing in wording is to ensure that the City Centre continues to receive the protection it requires.

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
--------------	-------------------	-----	--	--

Customer Number	04416	Name	Scottish Provincial Press Ltd	Organisation	Scottish Provincial Press Ltd
Agent Name amd Organisation (if applicable)		Kerri McGuire		Graham And Sibbald	
Section	4.Development Allocations		Paragraph		
Reference	IN9		Type	Change	Comment Late
				No	

Comment Changes

We request that that the Council does not allocate the land at Inverness Harbour Marina (IN9) as a development allocation.

Representation

We refer to the current consultation for the Inner Moray Firth Proposed Local Development Plan. We write on behalf of our client Scottish Provincial Press Ltd. Our client owns a property at Stadium Road, Inverness and wishes to object to the proposals for the land at Inverness Harbour Marina (Allocation IN9). Scottish Provincial Press Ltd is a privately owned company producing fifteen weekly newspapers covering Caithness, Sutherland, Ross-shire, Inverness-shire, Strathspey, Moray and Banffshire. The newspapers are produced from 11 offices, one of which is based at Stadium Road, Inverness. Scottish Provincial Press Ltd fully supports the enhancement of this waterfront area. However, it is considered that the extent of the proposed development and the uses proposed will impact on the existing businesses at this location. Development Allocations Site IN9: Land to South and East of Inverness Harbour Marina The proposed allocation at Inverness Harbour Marina allows for a variety of uses including business, industrial, tourism, retail and leisure. This designation allows for a wide range of uses and does not provide any guidance on how these uses will be integrated with the surrounding land uses. The proposed designation provides no indication of floorspaces that would be allowed at this site. The allocation of this site and the requirements also do not identify any phasing for the development of the site. In particular, our client is concerned about the potential for industrial use at this location. In proposing industrial use at this location the Council has not taken into consideration noise impact on the existing businesses in this location. Noise associated with the proposed industrial use at this location has the potential to have significant impacts on existing businesses. The allocation of this site has also not taken into account transport implications associated with the increase in traffic in this area, particularly the scale of vehicles associated with industrial development. An industrial development at this location also has the potential to raise air quality issues and visual impacts at this important waterfront location. The Proposals Map suggests that a significant area of land reclamation will be undertaken. It is unclear from the proposed requirements what this reclaimed area will be used for and how far it will extend. We consider that given the constraints associated with the site and the impact on the existing land uses, this site should not be identified as a development allocation in the emerging Local Development Plan. Main Issues Report This site was not identified as a preferred development site at the Main Issues Report consultation stage. At the Main Issues Report consultation stage the Council had identified a number of constraints associated with the site including the following: •Flood Risk •Impact on Natural Heritage •Visual Prominence We fully agree with the Council’s assessment of the site at the Main Issues Report stage. We consider that this site should not be identified as a development site in the Local Development Plan. We also fully agree that this is a visually prominent and important waterfront location and the development of this area would have significant visual impacts, particularly associated with the proposed industrial use. The development of this site also has the potential to impact on the existing land uses in terms of traffic and noise. It is unclear why The Highland Council is now supporting the allocation of this site at the Proposed Plan stage. The importance of this waterfront location and the visual prominence any development would have should be fully recognised in the preparation of the Local Development Plan. We request that the Council takes into account the impact on the existing land uses and the important local and regional economic resource that these existing businesses provide. We request that the Council does not allocate the land at Inverness Harbour Marina as a development allocation. We trust that the above comments will be taken into consideration in the preparation of the Local Development Plan. As a neighbouring property, our client requests that they are fully consulted on any development brief or masterplan that is prepared for this site.

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
--------------	-------------------	-----	--	--

Customer Number	04485	Name	Fraser Grieve	Organisation	Scottish Council for Development and Industry
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Inverness	Type	Change	Comment Late	No

Comment Changes

Identify opportunities for residential properties near the Marina.

Representation

SCDI believes there are opportunities for residential properties near to the Marina and that this should be considered within the development plan. Whilst additional industrial land in Inverness will be needed there may also be opportunities to extend residential development from the city centre towards the harbour in the long term.

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
--------------	-------------------	-----	--	--

Customer Number	00523	Name	Mrs Cerian Baldwin	Organisation	Scottish Environment Protection Agency
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	IN9	Type	Change	Comment Late	No

Comment Changes

The site is likely to be at significant flood risk and it is uncertain whether the principle of development can be established in accordance with Scottish Planning Policy.

Representation

We therefore object unless it is removed from the Plan or a Flood Risk Assessment is carried out at prior to inclusion in the Plan which demonstrates that the proposals would comply with Scottish Planning Policy

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
--------------	-------------------	-----	--	--

Customer Number	01196	Name	Inverness Harbour Trust	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	IN9		Type	Change	Comment Late
				No	

### Comment Changes

Site: IN9 “Land at Inverness Waterfront; Area (ha): 29.0; Uses: tourism, retail, leisure, business, residential and harbour uses Requirements: scale, composition and extent of development to be determined by a masterplan to be informed by appropriate engineering, conservation, environmental and market evidence as required to satisfy statutory requirements”. The Proposals Map should be adjusted accordingly as attached. Corresponding changes to the Inverness to Nairn Growth Area “vision” and “strategy”, viz. at para. 3.1 (second bullet) add “Inverness waterfront”; and at para. 3.5 (a third bullet) add “allocations of land for new jobs and houses, including by transforming Inverness waterfront into a vibrant mixed-use urban quarter as a new place for living, work and leisure able to deliver strategic economic development”.

### Representation

DOCUMENTS Inner Moray Firth Major Ports & Sites Strategy 2006 extract Inverness Culloden and Ardersier Local Plan 1991 extract Letter dated 9th December 2013 from A F Cruden Associates Representation on behalf of G H Johnston Building Consultants Ltd to Main Issues Report dated 5th July 2012 on behalf of INVERNESS HARBOUR TRUST 1.The MIR identifies part of the Trust estate as industry (preferred) and the substantive part as non-preferred. The following representations seek a significant reappraisal of the potential of the 38 ha. development opportunity on the lines presented on behalf of the Harbour Trust at the Call for Sites stage. All of the Harbour Trust assets should be allocated mixed use and preferred and a comprehensive development proposal promoted as part of a masterplan within the Proposed Plan. 2.The MIR has failed to reflect the sense and objectives of the Inverness Harbour Trust (Call for Sites) representations. It is inappropriate that the MIR continues to see the future of the harbour as a conventional industrial port; whereas the Harbour Trust had promoted a much wider development and a broader range of mixed uses much more akin to the substantial waterfront schemes that have sustained regeneration in many UK cities over the past decade and more. 3.The MIR is therefore extremely restrictive in its reference to industry and the preference/non-preference it promotes; it is partial and selective in the uses and extent of development it would enable; and it is unnecessarily presumptuous about phasing and the impacts of development. Neither land reclamation or development is discouraged in principle by the proximity of the firths; both have been achieved within the past 5 years as the most recent significant phase of the harbour development. Development would be outwith the HSE buffers. 4.In respect of all of these factors, the MIR does not sit easily with the Highland-wide Local Development Plan either in its appreciation of the potential contribution of the Harbour Trust estate to strategic regeneration objectives (in particular its juxtaposition with the declared priorities at South Kessock, Longman core and Longman seaboard), the essential tourism and business streams it seeks to accommodate, or its operational policies and the evidence base that underpins them. 5.It is particularly disappointing that the MIR appears not to have taken account of the conclusion of the Inner Moray Firth Major Ports and Sites Strategy (2006) which invited a wider waterfront real estate development package. As a result the MIR provisions are significantly understated and a major missed opportunity for a city - renowned for turning away from its waterfront - and the regional economy. The purpose is to ensure the leisure sectors identified in the Highland-wide Local Development Plan) are achieved through a viable market opportunity able to maximise the benefits to Inverness and the region. A creative approach is essential to transforming an industrial landscape to an attractive, appealing place. 6.The lead policy in the Inner Moray Firth Major Ports and Sites Strategy (2006) acknowledges “pressures to develop other sectors of the large Inverness Waterfront for housing, leisure and commercial uses are expected to gather pace over the next decade ... market pressures and rising land values will eventually promote intensive property schemes”. That provides the framework on which to promote the future of the harbour. 7. The vision is to create a vibrant quayside waterfront quarter, a new place for living, working and leisure based on a composition of high density development, transforming the city’s waterfront, its profile and image. Mixed housing, offices, hotels and conference facilities; a leisure hub of national visitor centre, tourist shops, entertainments, bars, eating places at quayside level around the centre-piece: an expanded marina and canal. Streets and spaces, a park and promenade; iconic architecture and engineering: a pedestrian bridge of the Ness ... essential waterfront development, of its place, connecting the outstanding marine heritage ... a natural gateway. 8.The concept promoted on behalf of the Harbour Trust is founded on all of the following inter-related principles: •high intensity mixed uses and critical urban mass to create “place” - a new gateway to Inverness and a leisure/business hub to embrace the Trusts subjects initially between Carnach Point and the Kessock Bridge. It is the ability - recognised in policy - to create place, that will secure investment and property development at such time as the market determines. Residential is vital to the viability of that mix; •a composition of development essential to the location, reflecting the uniqueness of Inverness harbour in the north-east of Scotland, its development prospects and the value of the port to regional transport, infrastructure and tourism. In that regard the value of the Trusts assets lies in the principle that these are promoted as a comprehensive package: the corollary - to fragment

them - would significantly undermine its potential; •a scale of development able to secure viability and to support/collaborate with the strategic regeneration objectives which adjoin the Trusts subjects in three directions. In that respect the Trust estate presents a vital contribution to the City strategy; and that scale of development would contribute to integrated facilities and infrastructure upgrades; •potential for development east of the Kessock Bridge (whether in the leisure or cargo-trans-shipment sectors) which - in view of market prospects, opportunities in the cruise-ship sector, logistical restrictions on shipping, and an appropriate long term perspective for the harbour - needs to be taken into account and planned for now; •sustaining the harbour as a regional transport hub, its existing functions and upgraded infrastructure to meet identified business streams in the next 15 years (eg. including options relating to transportation/renewables) which are vital to the Trust, Inverness and the regional economy.

9. The Proposed Plan must therefore be based on an outcome that: (i)restores a wholly mixed use allocation (for all of the uses promoted in the Call for Sites) such that it allows maximum flexibility, a diverse waterfront and a composition of development that would evolve as part of a comprehensive masterplan approach. These uses include: commercial, office, retail, residential, tourist and leisure. (ii)recognises that the opportunity at Inverness harbour derives from the extent of the Trusts ownership and that the viability of development and the business streams promoted in policy require a comprehensive (not selective) approach and thus an appropriate allocation of all of the Trusts interests; and (iii)avoids premature judgements about the extent of land reclamation or its impacts when policy invites such issues to be determined by evidence; or that there is any predetermined view that development opportunities can be taken forward on a piecemeal basis.

10. In 2008 the Harbour Trust presented plans of a hotel adjacent to the marina as a pre-application engagement with A+DS. The A+DS response is attached. A+DS applauded “the inspiration to create a special place”; that the project had “considerable potential” and encouraged a “response to the unique characteristics and challenges” the location presented. It saw the site as “visually important” and in “an exciting landscape”: “a spectacular setting” able to redefine “Inverness’s northern edge”; “an opportunity to “raise the quality and appearance of what is presently a semi-industrial area to a very special place”.

11. A+DS suggested a “wider masterplan or design framework to set the proposal in a broader context”; examining “integration with adjacent sites (some of which are in the clients ownership) including those on the opposite bank of the Firth”, and identifying “how the port and its associated development connects to the city centre”.

12. In relation to viability A+DS “support the intention to create a high quality destination with a variety of uses to encourage life and vitality”; that care was needed “that the long term vision will be delivered; a revision to the aesthetic norm of industrial/retail sheds should be resisted”; and that there are opportunities to “investigate new live/work typologies that would introduce a mix of uses to help activate the area at different times of the day”.

13. A+DS believe there is “potential for this to become an exemplar project”. “The importance of design goes beyond its immediate boundaries, as it will influence the formation of an urban quarter” ... it encourages a “visionary and creative approach”.

14. A+DS is a significant influence in place-making, one of the core objectives of the Highland-wide Local Development Plan. Its view fully embraces the concept the Harbour Trust wishes to promote at this time.

15. This requires a commitment to change an industrial landscape, connect the waterfront, revitalise an economic gateway, and recast the profile of Inverness: that can be brought about by a commitment to the market package and mixed uses proposed. That is not the view of the Harbour Trust alone; it is the view of those that formulated the Inner Moray Firth Ports and Sites Strategy and subsequently A+DS; it was the view of the Council’s own first Vision for Inverness (1997). The vision has somehow become blurred: the Inner Moray Firth Local Development Plan is the opportunity to restore it and begin to transform the City waterfront as a strategic priority.

16. The Trust propose to work closely with the community at South-Kessock/Merkinch and have made initial contact with community council interests in that regard. The Trust recognises sensitivities at Carnach Point - relating particularly to nature conservation and local amenities - and that the role of its interests at that location and any contribution it might make to the strategic regeneration objectives of the Highland-wide Local Development Plan should evolve in collaboration with local people. Further to the above representation and to ensure that objective is able to be fully explored, it is essential that the preferred mixed use status is applied to the Trust interest at Carnach Point. Further discussion on these matters as the Proposed Plan progresses would be welcomed by the Trust.

Allocated to	Central Inverness	IN9	Land to South and East of Inverness Harbour Marina	
--------------	-------------------	-----	--	--