

Highland Council Inner Moray Firth Local Development Plan

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

Customer Number	04151	Name	Michael Meehan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.97	
Reference	CR1		Type	Change	Comment Late
				No	

Comment Changes

Change number of houses from 180 to 50 No houses to be built on site CR1 50 houses to be built on site CR2

Representation

180 houses is too many for Croy to remain a small village, it would become a small town. There will be a town very close by at Tornagrain, so there is no need for such a large development at Croy. Site CR1 should remain as green field, preserving the pleasant rural aspect of the village. There are currently two sites already under development, CR2 and at Torran Beag, this is enough expansion for Croy. CR2 should be developed further with a maximum of 50 houses to link the village with the existing development at Ardgowan.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	04152	Name	Michael Meehan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.97	
Reference	CR1		Type	Change	Comment Late
				No	

Comment Changes

No houses to be built on site CR1

Representation

There are Badger setts in the area. Badgers forage in the field of CR1. An appropriate survey be undertaken to ensure all aspects, setts, paths and foraging areas are taken in to account.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	04153	Name	Brenda Meehan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.97	
Reference	CR1		Type	Change	Comment Late
				No	

Comment Changes

Change 180 houses to 50 houses. No houses on site CR1. 50 houses on site CR2.

Representation

180 houses is too many for Croy to remain a small village, it would become a small town. There will be a town very close by at Tornagrain, so there is no need for such a large development at Croy. Site CR1 should remain as green field, preserving the pleasant rural aspect of the village. There are currently two sites already under development, CR2 and at Torran Beag, this is enough expansion for Croy. CR2 should be developed further with a maximum of 50 houses to link the village with the existing development at Ardgowan.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	04153	Name	Brenda Meehan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.97	
Reference	CR1		Type	Change	Comment Late
				No	

Comment Changes

No houses to be built on site CR1.

Representation

There are Badger setts in the area. Badgers forage in the field of CR1. An appropriate survey should be undertaken to ensure all aspects, setts, paths and foraging areas are taken in to account.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	04194	Name	Caroline Walford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	CR1		Type	Change	Comment Late
				No	

Comment Changes

I seek a reduction in the housing capacity of Croy site CR1 from 35 homes to 25 homes

Representation

This site was not included in the HwLDP (though it was included in the 2003 Inverness Local Plan where the slightly smaller area of 1.8 hectares was assigned a capacity of 15 houses). The Highland Council Planning & Development Service published an IMFLDP Housing Land Requirement Background Paper in November 2013. Since the paper was published in the same month as the proposed IMFLDP, it seems reasonable to expect the housing capacity of site CR1 to reflect the guidance set out in this paper. This is not the case. The Background Paper includes a Capacity Calculation Methodology for Housing Sites Not in HwLDP. This methodology gives a density figure for 10 units per hectare “where the settlement/parts of the settlement is characterised by low density development”. Parts of Croy are characterised by low density development. The 40-house development completed by Scotia Homes in 2008 (the most recent large-scale development in the village) was built at a density of 10.3 units per hectare. The individual houses around the south-east corner of site CR2 are built at a similar density, as are those to the south and east of site CR1. Thus, according to the methodology, future developments in the village should be built 10 units per hectare. The appropriate capacity of the 2.5 hectare site CR1 is therefore 25 houses.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Page 103	
Reference	Site: CR1 East of B9006		Type	Change	Comment Late
				No	

Comment Changes

I object to the wording of the text as it stands and seek an addition to the text to reflect the existence of Policy 5 and the topography of the village. Please add the following sentence at the end of the text for this site, “Development proposals for site CR1 should take into account the IMFLDP Policy 5 and site CR1’s potential proximity both to the Croy Burn and to the Croy section of the Kildrummie Kames esker system.”

Representation

In support of this objection to the text and the request to redraft the text I have attached a document which is available on line and which is itself an extract from the 'Geological Conservation Review', Volume 6: Quaternary of Scotland, Chapter 7: Inverness area Site: KILDRUMMIE KAMES (GCR ID: 418)

Allocated to	Croy	CR1	East of B9006	
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Customer Number	04506	Name	Bruce Strachan	Organisation	Croy and Culloden Moor Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	CR1	Type	Change	Comment Late	No

Comment Changes

Representation

The area marked out is very close to the sewage works (which may need to be enlarged/upgraded). It is not desirable to put any part of the development so close. We would suggest the number of houses proposed should be reduced. This site, together with the first phase of site CR2, could potentially increase the village by 50%, which we do not agree with.

Allocated to	Croy	CR1	East of B9006	
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Customer Number	03964	Name	Andrew Cartmell	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	Croy CR1	Type	Change	Comment Late	No

Comment Changes

I would like no houses to be built on proposed site CR1

Representation

This building of 35 houses on site CR1 will cause excessive noise pollution,not just during the construction process but also on completion The addition of 35 houses and therefore a possible 70 cars with dramatically affect the nature of a rural village. The current road access into Croy includes 2 single track roads that would not be suitable for this kind of increase in traffic. Also drainage issues are a concern. Several properties built in recent years have caused drainage problems and the erection of this amount of houses directly next to and slightly higher than my property causes me great concern. There is included in the local plan a building of some 10000 houses in a major site at Tornagrain. Why the need to ruin the centre of Croy with this site? The value of my property is now going to decrease dramatically because of the proposition. I do not want to live with a housing estate in my back garden but now cannot afford to move precisely because if this plan

Allocated to	Croy	CR1	East of B9006	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

I seek change to the final sentence of the paragraph relating to Croy site CR2 due to lack of clarity in the current wording.

Representation

This sentence would read with more clarity as follows: "Development of the site should be phased over the period 2011 to 2031 with development progressing at a prescribed rate of no more than 50 homes delivered in each 5 year period from 2011 to 2021, and 25 homes delivered in each 5 year period from 2021 to 2031". This accurately reflects the phasing set out in the HwLDP.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

less houses built in Croy and at a different site.

Representation

We chose to live in Croy for the country aspect and a village environment. The prospect of a large development over the next 20 years directly in front of our property along with the other properties lining the B9006 is quite bewildering (a building site for 20 years).

We have no real problem for 30-40 (not 150) houses built adjacent to the previous development. As long as there is a demand for housing with all the other developments in planning, that should cater for the influx of new residents.

Such fertile agricultural land should be kept in tact, it will be needed in years to come.

No turing back once built on. There must be other land that is desirable to build on, not rich agricultural land.

I can not see where all the employment is going to accommodate new residents on this scale. The area is quite unique to Scotland. Please don't spoil it.

Allocated to

Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Page 105	
Reference	Site CR2 West of primary school		Type	Change	Comment Late No

Comment Changes

I seek recognition within, and amendment of, the ‘Site CR2’ text to reflect that a significant proportion of the ‘Mixed Use: Site CR2 West of primary school’ specifically lies within the Kildrummie Kames Esker system. Please see Representation section for details of the changes in wording sought. In support of this objection to the text and the request to redraft the text I have attached a document which is available on line and which is itself an extract from the 'Geological Conservation Review', Volume 6: Quaternary of Scotland, Chapter 7: Inverness area Site: KILDRUMMIE KAMES (GCR ID: 418)

Representation

I seek that, given the potential environmental sensitivities of this site the text of the ‘Mixed Use; Site CR2 West of Primary School’ is redrafted to state that: ‘Area (ha) 15.0 - Uses: residential (no more than 150 units), retail and community Requirements: “The council, further to consultation with the relevant statutory agencies, and taking into account measures set out in Policy 5 of this plan, will prepare a development brief (to be adopted as Supplementary Guidance) in order to ensure that the appropriate environmental mitigation would be in place before development of any kind progresses on this site. The brief will address phasing. Any development proposals presented would need to take into account this guidance and also address; improvements to linkages to the A96 and Mid-Coul roundabout and the B9006; transport assessment and necessary mitigation of impacts on local and trunk road networks; provision of appropriate SUDS; provision of footpath/ cycleway connection to wider village network; provision of open space, which should be delivered in line with the requirements of Open Space in New Residential Developments: Supplementary Guidance; Development of this site to 2031 should take place in 5 year periods and numbers permitted in construction phases will take into account the timing of environmental monitoring and the restoration of the Croy Burn.’

Allocated to	Croy	CR2	West of primary school	
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Customer Number	04194	Name	Caroline Walford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	CR2	Type	Change	Comment Late	No

Comment Changes

I seek a reduction in the housing capacity of Croy site CR2 from 150 homes to a maximum of 114 homes

Representation

As noted in my comment on Croy site CR1, the Highland Council Planning & Development Service published an IMFLDP Housing Land Requirement Background Paper in November 2013. Since the paper was published in the same month as the proposed IMFLDP, it seems reasonable to expect the housing capacity of site CR2 to reflect the guidance set out in this paper. It does not reflect this guidance. The Methodology attached to the Background Paper states “If the site is allocated in the HwLDP, use this capacity figure unless there have been any changes since the time of adoption, for example ... the area of the site is proposed to change, etc.”. There have been two changes since the HwLDP in the case of site CR2. Firstly, the area of the site has changed. The area labelled “Ardgowan” on Map 10 in the HwLDP is a different shape and size to the area marked “CR2” on the map in the IMFLDP. Secondly, the use of the site has changed. The HwLDP states that the “chief use will be residential”, whereas the IMFLDP states that uses will be “homes, retail and community”. In the case of such changes, the guidance given in the Background Paper is that the site capacity should be reviewed in comparison with the Capacity Calculation Methodology for Housing Sites Not in HwLDP. It sets out the method of doing this, as follows: (1) Use GIS to calculate the site area. The area is given as 15 hectares. (2) Subtract any areas of the site that are clearly undevelopable, for example areas that are constrained by excessive slope, water courses etc. Attachment 1 to this document is a copy of an OS map showing the 1 metre contours of site CR2. Since I don’t have access to GIS, I have used other mapping software to arrive at the following areas. The bank marked at “A” is an excessive slope with an area of about 0.8 hectares. The area marked at “B” is a marsh from which the Croy Burn flows towards Loch Flemington and has an area of about 1.2 hectares. It is undevelopable due to its significance as the source of the Croy Burn and also due to the ecological importance and SPA status of Loch Flemington. These two areas total about 2 hectares and reduce the developable area of site CR2 to 13 hectares. Attachment 2 to this document is a copy of a proposed development layout for part of site CR2, which was presented to Croy residents by Scotia Homes. This document shows that Scotia did not intend to develop areas A or B but to leave them as “amenity” areas. I believe that an additional area of the site, marked at “C” on Attachment 1 is also undevelopable because of excessive slope. It has an area of about 0.4 hectares. If this area too is agreed to be undevelopable, then this reduces the developable area of site CR2 to approximately 12.6 hectares. (3) Determine whether the site is suitable for low, medium or high density development. As noted in my comments on site CR1, the Methodology gives a density figure of 10 units per hectare “where the settlement/parts of the settlement is characterised by low density development”. Parts of Croy are characterised by low density development. The 40-house development completed by Scotia Homes in 2008 was built at the low density of 10.3 units per hectare. The individual houses around the south-east corner of site CR2 are built at a similar density, as are those to the south and east of site CR1. Thus, according to the methodology, future developments in the village should be built at low density, ie 10 units per hectare. (4) Multiply the potentially developable area of the site by the appropriate density figure to determine the capacity of the site. With a potentially developable area of 12.6 hectares, and a housing density figure of 10 units per hectare, the capacity of site CR2 is therefore 126 residential units. (5) The Methodology states that for Mixed Use sites having three uses, the percentage of site developed as housing should be 70%. Site CR2 has been identified for three uses: homes, retail and community. Applying the 70% rule, the figure of 126 residential units given in (4) above reduces to 88 residential units. Paragraph 4.98 of the IMFLDP states that “allocations in the settlement are primarily focused on housing development”, so I doubt that it is envisaged that 30% of the site will be allocated for retail and community use. Nonetheless, some allowance must clearly be made for these stated uses when calculating the amount of land available for housing. If 10% of the developable area of the site is identified for retail and community use, then the area of land available for housing will reduce to 11.34 hectares. At a housing density of 10 units per hectare, the capacity of site CR2 is therefore a maximum of 114 residential units. I submit that the capacity of site CR2 should be carefully reviewed in comparison with the Capacity Calculation Methodology for Housing Sites Not in HwLDP, in compliance with the guidance set out in the Housing Land Requirement Background Paper of November 2013. Should it fail to carry out this review, and to make the appropriate adjustment to the capacity of site CR2, Highland Council Planning Department should be asked to explain why it has chosen not to follow its own newly-published guidance.

Allocated to	Croy	CR2	West of primary school	
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Customer Number04194NameCaroline WalfordOrganisation

Agent Name amd Organisation (if applicable)

Section4.Development AllocationsParagraph

ReferenceCR2TypeChangeComment LateNo

Comment Changes

I seek a delay to the start of development of site CR2 to reflect the phasing of the development of employment opportunities in Tornagrain

Representation

The phasing of site CR2 is front-loaded, in that two-thirds of the development is to be completed by 2021, and the remaining one-third of the development by 2031. This contrasts to Tornagrain, where 2.5 times as many homes are built in the second decade compared to the first decade, and where few employment opportunities are created until the period 2021-2026. Table 1 below illustrates this: Table 1: 2011-2016 2016-2021 2021-2026 2026-2031 2031-2036 2036-2041 Residential Units Croy CR2 50 50 25 25 0 0 Tornagrain 344 507 780 885 960 1100 Opportunities for Employment (m2) Retail 1500 0 9000 4500 500 2750 Business 500 0 2500 1750 750 1000 General Industry 0 0 500 300 200 0 Storage & Distribution 0 0 500 300 200 0 Hotel 0 0 2500 1500 0 0 Residential Institutions 0 1000 1000 1000 1000 1000 Primary School 0 1418 0 1418 0 2496 The IMFLDP acknowledges in paragraph 4.98 that “local employment opportunities will continue to be limited and strong connections to local employment centres will be important, especially the nearby proposed new settlement of Tornagrain and also the Inverness Airport Business Park”. Given the special importance of Tornagrain as a local employment centre, development of site CR2 should be delayed until sufficient employment opportunities in Tornagrain have been created. In the absence of sufficient employment opportunities in Tornagrain and at the Airport Business Park, residents of Croy will have to seek employment in Inverness or Nairn. The Reporters to the HwLDP determined that development of Croy was sustainable because local employment would be available at Tornagrain and the Airport Business Park. They rejected the proposed expansion of Culloden Moor on the grounds that “housing development on the site would be likely to increase commuting. This would not accord with Scottish Planning Policy”. Culloden Moor is much closer to Inverness than Croy, and if the Reporters regarded it as being an excessive commuting distance from Inverness, then Croy would certainly be too remote to be considered sustainable as a commuter dormitory for Inverness. In order for new residents of Croy to be able to find employment in Tornagrain, I seek a delay to the development phasing of site CR2 as shown in Table 2 below: Table 2 Residential Units 2011-2016 2016-2021 2021-2026 2026-2031 2031-2036 2036-2041 Croy CR2 50 50 25 25 Tornagrain 344 507 780 885 960 1100 If this is not possible, because the development period for Croy would extend beyond the end of 2031, then I seek an alternative (though less appropriate) development phasing of site CR2 as shown in Table 3 below. Table 3 Residential Units 2011-2016 2016-2021 2021-2026 2026-2031 2031-2036 2036-2041 Croy CR2 25 25 50 50 Tornagrain 344 507 780 885 960 1100 The attachment to this representation shows Tables 1, 2 and 3 above properly set out for clarity.

Allocated toCroyCR2West of primary school

Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Croy paragraph 4.99, page 103	
Reference	Croy Village		Type	Change	Comment Late
					No

Comment Changes

I object to the text of the paragraph at 4.99. The text fails to note that areas of Croy village are part of the Kildrummie Kames Esker system. I would like the text of paragraph 4.99 to be amended to the text as set out in the comment box ‘Your Representation’.

Representation

The text at Croy paragraph 4.99 should be rewritten as: ‘Croy lies within the catchment of the Loch Flemington Special Protection Area. Loch Flemington, along with some land in Croy village, forms part of the Kildrummie Kames SSSI / Flemington Esker system and eskers are vulnerable to groundwater pollution due to the porosity of the sand and gravel. Further, the Croy Burn, which arises from field drains in the village, is the only surface water input into Loch Flemington. To avoid any detrimental effect, on the water quality of the loch development, proposals will be required to comply with Policy 5 of this Inner Moray Firth Local Development plan.’ In support of this objection to the text and the request to redraft the text I have attached a document which is available on line and which is itself an extract from the 'Geological Conservation Review', Volume 6: Quaternary of Scotland, Chapter 7: Inverness area Site: KILDRUMMIE KAMES (GCR ID: 418)

Allocated to	Croy	General	General	
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Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Paragraph 4.97, Page 103	
Reference	Croy village		Type	Change	Comment Late
					No

Comment Changes

I object to the fact that the Settlement at Croy is seen as a part of the wider growth strategy of the A96 Corridor and seek that the Settlement at Croy should no longer be regarded as part of the wider growth strategy of the A96 Corridor.

Representation

Rationale Firstly, there is no specialist ‘A96 Corridor Developer Contributions Protocol’ in place as yet, despite it being described as a prerequisite for development in the A96 Corridor and it being listed in the HwLDP. Whilst ‘Inverness and the Inner Moray Firth’ appears as an ‘Area of Co-ordinated Action’ the main focus of the relevant NPF3 MIR section appears to be on the improvements to transport connectivity to facilitate the delivery of buildings for homes and jobs. The NPF3 section also covers things like, ‘sense of place, environmental quality and community wellbeing; alongside recognition of the benefits to be gained form key sectors of tourism, food and drink and energy. The NPF3 MIR records that, ‘Meeting our housing requirements will need delivery of a great many development proposals, from small to large, right across Scotland. Given the scale of this requirement, we do not think it is appropriate for NPF3 to single out for priority any particular developments on the sole or principal basis of their contribution to meeting housing need’. Furthermore, I was given to understand that a National Planning Framework is not a ‘prescriptive blueprint’ and development details are more properly the concern of the local authority. There is now no reason why, and I make these comments in the context of the statement made at paragraph 1.7 page 8 of the ‘Introduction’ section of the IMFLDP, ‘Any allocation and text in the adopted HwLDP that relates to sites within the Inner Moray Firth Area will be updated by this plans content.’ Croy’s relationship to the A96 corridor should not now be redefined

Allocated to	Croy	General	General	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

I object to the text as written and I wish for the removal of the following sentence from this paragraph, ‘...especially the nearby proposed new settlement at Tornagrain and also the Inverness Airport Business Park.’ Please refer to the ‘Your Representation’ part of this online form for the justification for this request. I also wish to add to the sentence at the end of the paragraph as follows, ‘...and in order to facilitate non-car travel a shuttlebus, for which developer contributions will be sought, will provide a connecting service between Croy and the rail halt at Dalcross.’

Representation

I object to the assertion that the Inverness Airport Business Park, IABP, will be in a position to provide employment opportunities locally given the current state of progress with the venture (I do support the recognition in the text that local employment opportunities will continue to be limited). Should the Authority feel unable to change the text as requested and this becomes an unresolved representation I seek that the Reporter takes note of these extracts from the Committee Report, regarding the Inverness Airport Business Park’s financial status, to the Council’s Strategic Planning Committee (PED) this year, 2013. (PED Report Extracts) ‘Inverness Airport Business Park Ltd issued Loan Stock of £1.175m to the Council to reflect the cost incurred by the Council in building the new access road to the airport from the A96. The repayment of this Loan Stock will allow the Council to recover its costs in constructing the road, albeit over a period of time... ..As reported to the Planning Environment and Development Committee in January 2011, Inverness Airport Business Park Ltd opted to defer the first repayment of the Loan Stock, amounting to £587.5k, due to be received by the Council in May 2010. This deferment was made in accordance with the Loan Stock agreement which allows the Company to defer the payment if they believe the repayment would have a prejudicial impact on their business proposals for the Business Park. Under the deferment arrangements, the 2010 repayment now becomes payable to the Council in May 2015 unless independent reviews of the Company’s accounts indicate the deferred amount can be paid earlier... ..Inverness Airport Business Park Ltd continues to have insufficient funds to repay the Loan Stock without the payment having a prejudicial impact on their business proposals for the Business Park...The Balance Sheet to March 2013 indicates the net worth of the company as £317,799 (£392,782 as at March 2012) and the Profit and Loss Accounts report a loss of £77,983 (loss of £21,475 for the year to March 2012) over the same period. These figures reflect that the company has still to fully commence its trading activities and is at an early stage in developing the business park.’ (Extract ends) I also seek that the Reporter takes note of the following facts; The table below is taken from the Inverness Airport Business Park Environmental Statement; Technical Annex 7, Socio-Economics, March 2008, section 5, page 34 Table 5.2 Employment capacity of IABP at full occupancy (number of workers Business Industry Other Total 2008 - 2011 1,120 283 125 1,528 2012 - 2021 3,360 849 339 4,548 2022 - 2041 7,280 1,840 615 9,735 2042 - 2061 11,200 2,831 882 14,913 It clearly shows that capacity was anticipated to be provided for a significant number of workers from 2008 onwards. No building work has been undertaken in the last 5 years. When the new plans for the Airport Business Park were unveiled for public display in early 2008, ‘The Caithness Business Index’ reported that it was estimated that the first phase of development, to 2021, could create around 70,000 sq metres of business accommodation, including an airport hotel supporting hundreds of new jobs. In April 2011, Urban Realm reported that, ‘Roxhill has signed a seven year deal with Inverness Airport Business Park (IABP) to develop 400,000sq/ft of warehousing and industrial space. Work on the £30m scheme, designed by 7N Architects, could start by the end of the year and complete by 2012 – subject to occupiers stepping forward to pre-let the space.’ On the 25 September this year, 2013, in an article in the ‘Strathspey and Badenoch Herald’, <http://www.strathspey-herald.co.uk/News/Inverness-airport-loan-repayments-up-in-the-air-25092013.htm> , Dr S Black, the Former ‘Director of Planning’ at the Highland Council, was quoted as saying that, “...the IABP had been operating in tough market conditions.” The new IABP chairman, David Hastings, was the subject of a press article in the local press in March 2013 which stated: PATIENCE will be needed as efforts continue to attract companies to the Inverness Airport Business Park, the organisation’s new chairman has warned. More than three years after the 250 hectare project received planning consent, Bond Air Services remains the only tenant and no operator has come forward to run a hoped-for hotel. As chief executive of the Strathleven Regeneration Company, a post he will continue to hold, Mr Hastings has helped attract more than £50 million to the Lomondgate development at Dumbarton and sees many parallels with the Inverness development. “Both are very ambitious projects and long term proposals,” he said. “It is very difficult to establish a new business location. At Strathleven the public perception was that nothing happened for seven years but there was in fact a lot of activity going on to put things in place. “Things came and went then we were successful in obtaining Aggreko as a tenant, which has just completed a £25 million manufacturing facility and transformed the location.” Given the points outlined above I believe that it is appropriate for this IMFLDP to be clearly informed regarding the status of this business park venture. Unless

Highland Council can provide detailed documentary evidence that a reasonable variety of jobs can be provided at the airport site between 2014 and 2021, in the first instance, then the local plan should not allowed be allowed to reflect that there will be any opportunities for employment on that site in the short to medium term. With respect to Tornagrain, Andrew Howard, managing director of Moray Estates Development Company, was quoted in the press <http://www.inverness-courier.co.uk/News/New-towns-first-resident-by-2015-29102013.htm> as predicting that construction of the new town 'could now last until 2063'; literature associated with the planning application submitted in 2009 originally describes a phased build over 35 years – (from 2011 to 2046). We are now talking about a timescale, if work on phase 1 starts in 2014 of 49 years (from 2014 to 2063) The same article also mentions that in the anticipated first phase of contruction, there would be 'about 200 homes...a shop and café'. This is hardly going to create a broad range of / large number of employment opportunities. Logic dictates that a plan led system should produce Local Development Plans which provide clarity regarding the employment opportunities available to support and sustain development within the plan period, particularly the early phases.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Reduction in the number of houses planned

Representation

The potential number of 180 new homes in Croy is far too much. It will totally change the character and social dynamics of the village, which will become a sprawling semi-town with no real identity. We have a real concern about the enormous increase in traffic levels in the village and on the B9006 and the impact this will have on travellers and residents as a result of increased noise and pollution levels from a fast and overcrowded road. This will result from the greater majority of people travelling to and from leisure activities, school and work because, as the plan acknowledges, employment opportunities here are very limited. We also have questions about the impact of the planned development on the local primary school and whether this will cope with increased demand for places. Clearly the existing sewage and water treatment facilities will be inadequate and we have concerns over the environmental impact of extending provision on residents here and on the water quality of Loch Flemington should leaching occur. No longer will Croy be a peaceful haven. When we moved here we, as did many other residents, made a lifestyle choice is in danger of being destroyed. The planned changes will do untold damage to a lovely village. A smaller increase in numbers to 40 - 50 homes will be more acceptable and do less harm to the character of our village. We do appreciate that development would be phased over the next 20 years so that we would not get the full impact immediately and that road links to the A96 may be improved.

Allocated to

Customer Number	04247	Name	Mary Harrison	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.97 to 4.100	
Reference	Croy	Type	Change	Comment Late	No

Comment Changes

Transport, I'd like to see consideration of good public transport from Croy to Nairn.

Representation

With development in the village there are likely to be increasing numbers of elderly people and young families. Car ownership is expensive, but necessary as there is no easy way to get from Croy to the local GP surgery or dentist. As this plan is long term, consideration should be given to this issue . The current road system is inadequate. transport infrastructure should be in place before further development is allowed. While I accept that development in Croy is inevitable, it is important that the necessary in fracture, sewage water etc are in place and that the development is in keeping with the village. It is a rural community and new housing should be low density in keeping with its surrounding. The community must be allowed to assimilate a new phase, before more is added. The threat of having the village as a 20 year building site is not appealing. As the community increases amenities for the youngsters, especially teenager needs to be provided, especially as there is not public transport in the evenings.

Allocated to	Croy	General	General	
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Customer Number	04506	Name	Bruce Strachan	Organisation	Croy and Culloden Moor Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Croy - General		Type	Change	Comment Late
				No	

Comment Changes

Representation

A general point for future plans, we suggest that the local community is involved at the start of the process, instead of being asked to comment on proposals which are already in place. There have been two meetings in the village concerning house building. The first involved a potential developer of 100 houses by Scotia Homes. Malcolm MacLeod attended the meeting of approximately 100, in which there was clear opposition to the proposal (which did not proceed). The other meeting on 18 November 2013, at which Scott Dalgarno was present to discuss the IMFDP, was attended by approximately 50 people and again there was little or no support for the plan. The Community Council has listened to these views and have had their own discussion of the plan. The Community Council does not object in principle to house building in the village, provided that the infrastructure is in place, the development fits into a rural situation and the size of the development is in proportion to the existing size of the village. We feel that the plan, as it stands, does not address these. Roads - The road from Croy to the Airport Roundabout (Mid Coul Road) is in an unsatisfactory state. This issue has been raised before and nothing done. More people use this road because the roundabout means an easier access to the A96. We have general concerns about the housing projected for Croy/Cawdor and the increasing number of cars on the roads. The B9006 meets the UHI junction and then the Inshes roundabout, which will cause further congestion. Increasing the amount of traffic by these rural developments is contrary to many of the statements in the environmental assessment regarding car emissions. How can parents be encouraged to get children to walk/cycle to school with increased traffic on the roads? We are led to believe that the 1st phase of Tornagrain will use Croy Primary School. This means using the Mid Coul road. In the IMFDP S4.98, it indicates employment for Croy could be at the Airport Business Park, hence putting more traffic on the Mid Coul Road. Can we have assurances that this road will be upgraded before it is used for school traffic? Unfortunately, there is the perception that the planning system seems unlikely to enforce conditions placed on developers (this came through at the meeting on 18th Nov 2013). We believe there should be a review of the speed limits on these roads and also of rural transport.

Allocated to	Croy	General	General	
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Customer Number	04506	Name	Bruce Strachan	Organisation	Croy and Culloden Moor Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	CR2	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

Housing - There are two housing sites in the area already, which remain mainly undeveloped land. We do not want the area to be a building site for many years. The housing proposed for site CR2 could lead to the same. The plan for over 180 new homes means doubling the size of the existing village over a relatively short time. We feel that this should not happen. The phasing should be over a far longer period of time to allow the community to settle in. Is it possible, apart from the usual affordable homes, to include some provision for sheltered accommodation? Site CR2 We support the SPA designation of Loch Flemington. This site, CR2, is a significant part of the catchment of the Loch and we feel that the Supplementary Guidance detailed in policy 5, should be part of the IMFDP. However, we are reassured that the planners have addressed the importance of the loch. A large part of the site CR2 is wet and will clearly restrict the number of houses that we feel could go on this site.

Allocated to	Croy	General	General	
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Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Paragraph 4.97, Page 103	
Reference	Croy village	Type	Change	Comment Late	No

Comment Changes

I seek both an addition to and an alteration of paragraph 4.97, page 103. I seek the addition of the following bullet point; the bullet point uses the same wording as appears for Policy 20, Croy Expansion', in the HwLDP • 'Avoidance of any adverse effects on the integrity of the Loch Flemington SPA and Kildrummie Kames SSSI' I seek an alteration of the bullet point, 'Capacity for over 180 new homes'. This should be replaced by, 'Capacity for around 180 new homes'.

Representation

I make these objections in the context of: Paragraph 2.12, 'Site Capacities' – which I am also seeking to amend, please see relevant comment form; The descriptions of other land allocations in the IMFLDP PP such as, Nairn, 'Capacity for around 1990 new homes'; Tornagrain, 'Capacity to accommodate around 2,500 new homes till 2031; Auldearn, 'Capacity to accommodate around 60 new homes' etc. Paragraph 1.7, page8, of the IMFLDP, which states, 'Any allocation and text in the adopted HwLDP that relates to sites within the Inner Moray Firth Area will be updated by this plans content;

Allocated to	Croy	General	General	
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Customer Number	04247	Name	Mary Harrison	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference			Type	Change	Comment Late
				No	

Comment Changes

I'd like to see sustainable development in keeping with the village.

Representation

While I accept that development in Croy is inevitable, it is important that the necessary in fracture, sewage water etc are in place and that the development is in keeping with the village. The proposed plan means doubling the side of the village in a short period. I am not happy with this. The time scale for this number of houses should be significantly increased to allow for a stable community Croy is a rural community and new housing should be low density in keeping with its surrounding. The community must be allowed to assimilate a new phase, before more is added. The threat of having the village as a 20 year building site is not appealing.

Allocated to	Croy	Housing	HousingPop	
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