

# Highland Council Inner Moray Firth Local Development Plan

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

Customer Number  Name  Organisation

Agent Name and Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

### Comment Changes

I also object to the last sentence in paragraph 4.43, also with regard to the reference to 'Emerging employment opportunities at the Airport Business Park and ask that this be replaced with a sentence to state, 'In order to facilitate non-car travel a shuttlebus, for which developer contributions will be sought, will provide a connecting service between Tornagrain and the rail halt at Dalcross.'

### Representation

I also object to the last sentence in paragraph 4.43, also with regard to the reference to 'Emerging employment opportunities at the Airport Business Park and ask that this be replaced with a sentence to state, 'In order to facilitate non-car travel a shuttlebus, for which developer contributions will be sought, will provide a connecting service between Tornagrain and the rail halt at Dalcross.'

Allocated to

Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Paragraphs 4.42, page 68	
Reference	Tornagrain		Type	Change	Comment Late No

Comment Changes

I object to the inclusion of the bullet point, ‘Proximity to Inverness Airport Business Park providing employment opportunity’ in paragraph 4.42 and ask that this bullet point be withdrawn.

Representation

I object to the inclusion of the bullet point, ‘Proximity to Inverness Airport Business Park providing employment opportunity’ and ask that this bullet point be withdrawn for the reasons that I have set out here. 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. 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 (NB TABLE DID NOT UPLOAD PROPERLY) 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.						
Allocated to	Tornagrain	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	TG1		Type	Support	Comment Late	No
Comment Changes						
Representation						
We would also highlight our support for Tornagrain as a leading model for a sustainable community.						
Allocated to	Tornagrain	TG1	Tornagrain			
-----						

Customer Number04364NameKatharine RistOrganisationWoodland Trust

Agent Name amd Organisation (if applicable)

Section4.Development AllocationsParagraph

ReferenceTG1TypeChangeComment LateNo

Comment Changes

Area encompasses large part of Tornagrain Wood, patches of woodland either side of School Brae at NH779503 and NH781505; and a substantial part of High Wood at NH779498. All of these existing woodlands are long standing ancient woodland. Development proposal at 09/00038/OUTIN recognises the larger areas of woodland – as commercial woodland with a view to replanting with a mix of species. This must be managed as appropriate to an ancient woodland site. However long term plan shows loss of much of Tornagrain Wood and part of woodland to the South. The plan regards the larger woodlands states at p 51 as “The only woodland being removed is part of a commercial plantation already programmed for felling”. This does not recognise the nature of the woodland as plantation on ancient woodland and its potential for rehabilitation and enhancement of the development. The Highland Policy on AW is not recognised in the planning statement.

Representation

The Woodland Trust Scotland considers that any woodland included in Scottish Natural Heritage’s Ancient Woodland Inventory (AWI) which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and is therefore high value for conservation and worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. Highland Council supplementary guidance notes that woodlands and trees offer multiple benefits in terms of addressing climate change, improving the water environment, providing valuable habitats, timber industry and creating recreational opportunities. Considerations include the cumulative impact of woodland removal, and fragmentation of habitat. Both Scottish Government policy and the Highland Wide LDP policy create a presumption in favour of protecting woodland. The Highland Wide LDP in policy 57 recognises ancient woodland as (depending on the category) of regional or national importance. Both the Woodland Trust Scotland and Scottish Planning Policy at para 148 consider ancient and semi natural woodland to be an important and irreplaceable national resource and should be protected and enhanced. The Woodland Trust Scotland would like to see a clear statement that the loss of ancient woodland cannot be mitigated, and therefore warrants protection from development. Development impacts on ancient woodland in a number of ways including chemically, disturbance by human activity, fragmentation, and colonisation of non-native plants. The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Allocated toTornagrainTG1Tornagrain

Customer Number	04182	Name	Charles Riddoch	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.42	
Reference	TG1		Type	Change	Comment Late
					No

Comment Changes

There should be no development at Tornagrain at all.

Representation

I am writing to object to any housing development at Tornagrain. It is a peaceful and tranquil area and any additional housing will destroy the ambience of this area.

Allocated to	Tornagrain	TG1	Tornagrain	
--------------	------------	-----	------------	--

Customer Number	04414	Name	Medco Ltd	Organisation	Medco Ltd
Agent Name amd Organisation (if applicable)		S White		urnberry Consulting Ltd	
Section	4.Development Allocations		Paragraph		
Reference	TG1		Type	Change	Comment Late
					No

Comment Changes

Area(ha): 259ha Requirements: Development to be brought forward in accordance with planning permission 09/00038/OUTIN and associated masterplan.

Representation

Planning Permission in Principle for Tornagrain has been issued since the Proposed Plan was drafted and therefore the text of the allocation needs to be updated to recognise the requirements of the permission as the key reference point for the detailed schemes, which will come forward on a phased basis. The Estate remains fully committed to the implementation of Tornagrain, and indeed, is currently in dialogue with delivery partners of the first phase of development which is currently in the detailed design process.

Allocated to	Tornagrain	TG1	Tornagrain	
--------------	------------	-----	------------	--