**The Highland
Council
Comhairle na
Gàidhealtachd**

Inner Moray Firth
Local Development Plan

Plana Leasachaidh Ionadail
Linne Mhoireibh A-Staigh

Main Issues Report

2020

www.highland.gov.uk

How to comment

This document asks for your views on the Main Issues that will affect the future development of the Inner Moray Firth area. We will use these views later to help us prepare the new Inner Moray Firth Local Development Plan. This Main Issues Report includes a suggested Vision (described as Outcomes) and Spatial Strategy for the Plan area and lists the Council's initial preferences on development site options and priorities for settlements.

Throughout the document you will find consultation points which set out questions on the Main Issues for you to consider. We have drawn up options for tackling each Main Issue, and have highlighted which option the Council prefers. We ask you to read and think about these options and tell us your views, including which option(s) you support and why. When assessing the options for development sites, you may wish to suggest that an alternative site is more suitable than the preferred site(s) we have identified. You may wish to suggest an alternative boundary for a site or settlement, or a more appropriate use for a site.

The easiest way to read and comment on this Main Issues Report is through our Consultation portal. Copies of the Main Issues Report in .pdf format are also available here, however to comment, you must access the portal. If you do not have access to a computer then please contact the Development Plans Team and we will provide a form for you to submit your comments.

All comments must be made by

How to find out more

Our [website](1) details events that will be held during the consultation period. If you would like to speak to a member of the Development Plans Team please contact us by email at imfldp@highland.gov.uk or by calling 01349 886608.

What is the status of this document?

This is a consultation document and does not represent the approved planning policy of the Highland Council. Its contents, as yet, are not used in the determination of planning applications. Instead, it sets out the Council's initial ideas and preferences for the future planning of the Inner Moray Firth area in a way that is intended to prompt debate and comment.

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1   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/202/inner_moray_firth_local_development_plan

About this Main Issues Report

The formally approved, statutory development plan for this area comprises the existing [Inner Moray Firth Local Development Plan adopted in July 2015](#)[2] (aIMFLDP), the [Highland-wide Local Development Plan adopted in April 2012](#)[3] (HwLDP) and [detailed planning guidance](#)[4] connected to these two plans. For a very limited number of sites and developments the aIMFLDP and HwLDP say different things about the Council's attitude to development. In the event of any incompatibility between a provision of these two plans then the more up to date plan (i.e. the aIMFLDP) will prevail as the Council's policy for that site/issue.

How to use this document

This document is made up of maps and text. If you are interested in finding out what it means for your particular area or proposal then you need to read both. Also, to get a complete picture this Report should be read in conjunction with other relevant documents. The most important of these are illustrated in Figure 2.1 'Other documents affecting the Main Issues Report'. Please note that the boxes are aligned next to the section of the Main Issues Report to which they most closely relate but many also influence other parts of the Report.
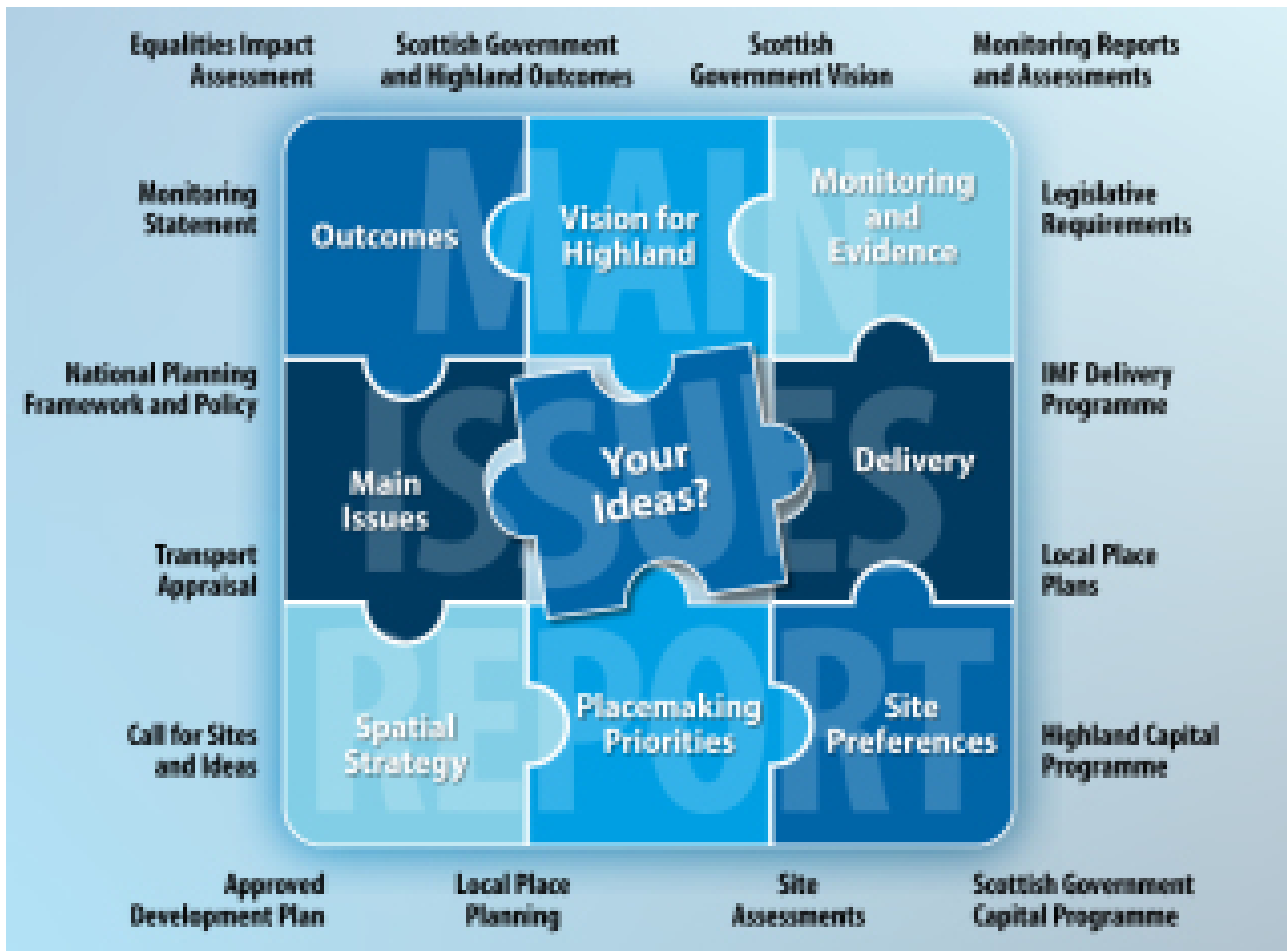
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2   https://www.highland.gov.uk/downloads/file/15008/adopted_inner_moray_firth_local_development_plan
3   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/199/highland-wide_local_development_plan
4   https://www.highland.gov.uk/directory/52/development_guidance

Figure 2.1 Other documents affecting the Main Issues Report

In the future, plans prepared by individual communities will play an increasingly important role, influencing the Council's Plan, which in turn will shape the local context. More formal arrangements for the preparation of these so-called "Local Place Plans" will be confirmed by the Scottish Government in the next 1-2 years.

At a more strategic level, there are wide range of plans, policies, strategies and other documents that underpin or otherwise influence this Report and can affect a planning decision. Of particular note is the Monitoring Statement which is cross referred throughout this Report and provides the evidence and rationale for the Main Issues and the options set out.

What are the steps in making the Plan?

This is the first of several versions of the Plan. Each successive version becomes more detailed and more definitive as the Council's view on development within the Inner Moray Firth area. We have already asked people for ideas through a "Call for Sites[5]" and these views have been useful in

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5   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/202/inner_moray_firth_local_development_plan/3

About this Main Issues Report

preparing this document. Many of the Call for Sites development site suggestions are included in this Report with an initial indication of what we think of them. However, some suggestions have not been included because we think they are of too small a scale to be significant to the future of a main settlement or they are proposals or in locations that are clearly, in our view, environmentally unsustainable. This Main Issues Report's primary purpose is to prompt public debate and written comment on how the Council and others should shape future development of the area.

We will collate and analyse all comments, seek further input and then publish a Proposed Plan version of the document in around a year's time. This will then be the Council's "settled position" on many details of how and where development should happen including for example what developers will be required to do to receive planning permission on any given site. This too will be consulted upon but with an emphasis on testing the Council's position. Those disagreeing with the Council's view have a right of objection which, if unresolved, is referred to a Scottish Government appointed person called a Reporter for their decision. Thereafter the Council publishes a final version of the Plan incorporating changes recommended by the Reporter.

1.1 Vision and Outcomes

The proposed Vision for the Inner Moray Firth area is set out in Table 1 'Topics and Outcomes' as four inter-related headline outcomes. This provides an ambitious and appropriate framework for the future which takes account of national priorities and investment. It also takes account of the Council's vision and strategy for Highland recently submitted to Scottish Government for consideration as part of the new National Planning Framework 4. This has been tailored to the Inner Moray Firth area and has therefore shaped this Report's Outcomes, Spatial Strategy and Placemaking Priorities which the Plan and other place plans will be expected to deliver.

Table 1 Topics and Outcomes

Growing Communities	Our communities will be sustainable, well-designed places with homes which meet people's needs. More people will want to live in Inverness and the larger towns and villages as they are attractive, safe, socially inclusive and healthy, with thriving centres and better access to services and facilities. Inner Moray Firth communities will function as networks of locally resilient and self-supporting places with equality of access to local resources.
Employment	The Inner Moray Firth economy will be growing, greener, circular and diverse. Local enterprises will be national leaders in the life sciences, sustainable tourism and renewable energy sectors. More traditional sectors such as construction, food and drink and smaller scale general industry will have continued to thrive and provide jobs close to where people live reducing the need to travel.
Connectivity	It will be easy to move around and between settlements in the Inner Moray Firth area. Walking and cycling will be the logical choice for most day to day trips, with longer journeys made using an efficient, reliable public transport system and, in rural areas, shared transport and electric vehicles. Sustainable regional, national and global connections will be available from modern bus and rail stations, harbours and Inverness Airport. Improved digital connectivity throughout the Plan area will enable home working for most people, helping to reduce the need to travel.
Environment	The Inner Moray Firth's built, cultural and natural assets will be safeguarded and appropriately managed. Water, waste, heat, land and buildings will be used, re-used, located and designed in a carbon clever way. The environmental quality of all places will be safeguarded and where possible enhanced.

1 Vision, Outcomes and Main Issues

We have analysed past and likely future trends within each of these topic areas as set out in our Monitoring Statement and this evidence has influenced both the Outcomes and in particular the nine Main Issues, which we have identified together with our suggested approach to each of them. A summary of our evidence-led approach is explained in the following paragraphs and is set out in more detail in the accompanying Monitoring Statement.

Growing communities

Past and current trends suggest that the Inner Moray Firth is likely to have a future population that is stable but ageing. Our communities will continue to grow but often in locations that are environmentally unsustainable and where public infrastructure networks will struggle to cope. In terms of housing provision, waiting lists are not being cleared by the number of houses presently being built and there is shortfall in accommodation fully adapted to the needs of the ageing population. More positively, the Inner Moray Firth area has a level of development interest, land availability and development costs that makes growth more viable than in other parts of Highland.

Employment

Similarly, the Inner Moray Firth's likely future economy will be buoyant and diverse relative to other parts of Highland and Scotland because of its natural assets, good connectivity and centrality to the north of Scotland. However, some employment sectors have weaknesses such as tourism which is seasonal and some like energy and construction which are cyclical. As digital connectivity improves and face to face business becomes less vital then the Inner Moray Firth will offer a much better working and living environment than its more urban counterparts. Challenges remain most notably in tourism where without new investment in tourism infrastructure this trend may damage the visitor's experience of the Inner Moray Firth. Similarly, the current supply of employment land and buildings is not matched to current and likely future user requirements. There is an over supply of outdated office and larger industrial unit accommodation whereas there is an under supply of smaller general industrial units and of new, high quality commercial/community hubs in fully accessible locations. The private property market is unlikely to resolve these issues without public policy and financial intervention.

Connectivity

Analysis of recent travel patterns shows that more people are driving, congestion and climate change effects are increasing, fewer people are using buses and the location and design of newer urban developments is making these problems worse. The Inner Moray Firth is the most urban part of Highland and therefore gives us the best chance to move away from car-based living to more sustainable, healthier ways of getting around. Attitudes are changing, more people wish to

switch to more sustainable forms of travel and the technological innovations to allow such a switch are happening. Without a new approach to change travel opportunities and behaviours, many journeys will still be expensive, unreliable and of limited modal choice.

Environment

The Inner Moray Firth has fewer environmental constraints compared to the rest of Highland and many of these constraints are marine or confined to the mountainous periphery of the Plan area and therefore remote from local settlement and thus less at risk of direct impact from development. However, increased adverse climate change effects are being seen locally as evidenced by an increased frequency and magnitude of flood events. The private sector and individual households are unlikely to mitigate for and adapt to climate change without some form of public policy intervention. More positively, continuing natural processes such as the regeneration of woodland offer an opportunity, with simple safeguarding and minor physical measures, to enhance biodiversity and address climate change effects.

Our Main Issues

In addition, there are two pre-eminent Main Issues that have shaped this Report and influenced its Vision and Outcomes. These are the Climate and Ecological Emergency, as declared by Highland Council and Scottish Government, and economic recovery from the implications of the COVID-19 pandemic. Due to their fundamental and cross cutting impact, these two issues have been considered throughout this document. This Report poses options for addressing these issues and the feedback received will inform the next stage of the Plan, by which time it is hoped that a clearer picture will have emerged.

We have taken these Outcomes and the wider Vision and assessed what needs to be done to achieve them. We believe that there are nine Main Issues that need to be discussed and then a collective way forward decided upon and delivered.

1. Addressing the Climate and Ecological Emergency.
2. Supporting a strong, diverse and sustainable economy.
3. Growing the most sustainable places.
4. Delivering affordable housing.
5. Matching development with infrastructure capacity.
6. Creating a more healthy, sustainable transport network.
7. Identifying and safeguarding valued, local green space.
8. Placemaking.
9. Meeting the needs of an ageing population.

1 Vision, Outcomes and Main Issues

1.2 Main Issues

1.2.1 Addressing the Climate and Ecological Emergency

Tackling the climate and ecological emergency is at the heart of this plan review and embedded within each section of this Main Issues Report. Supporting a transition to green circular economy underpins the aims of this plan to tackle bith the climate and ecological emergency and recovery from the Covid-19 pandemic. The draft Environmental Report, which has been prepared alongside the Main Issues Report, assesses the possible effects which the Plan may have on the environment and has helped integrate these considerations in shaping the proposed Spatial Strategy, initial policy approaches and development site preferences. This approach is also directly aligned with the Council's [Indicative Regional Spatial Strategy](#) [6], which is a response to the current National Planning Framework consultation.

In May 2019 the Highland Council declared a [climate and ecological emergency](#) [7] and committed to work towards a Carbon Neutral Highlands by 2025. This is an ambitious commitment and this Plan will contribute to its delivery, which would mean Highland becoming the Council region with the lowest carbon footprint in Scotland [8]. The ecological element of the Council's declared Emergency is less well developed and it is noted that the Scottish Government has highlighted securing positive effects for biodiversity as one of the key requirements of the new planning system.

Efficient Use of Heat

The ways in which we generate and consume energy needs to play a major role in how we respond to the Climate and Ecological Emergency. The Council wants to help deliver national targets to transform the places we live through greater energy efficiency, more local energy systems and less reliance on carbon-based fuels. Future developments provide opportunities to deliver on these ambitions and help achieve low or zero carbon status. The Development Plan for Highland already

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6   https://consult.highland.gov.uk/portal/dp/npf4/npf4?pointId=5619115#document-5619115
7   https://www.highland.gov.uk/meetings/meeting/4119/highland_council/attachment/75435
8   This target is to have the lowest net carbon output per capita of any Scottish local authority.

sets out requirements for developments in terms of their sustainability and energy efficient design and we want to build on this by setting out what communities, developers and other stakeholders should do.

Decarbonising the gas network, which many parts of the Inner Moray Firth area is reliant on, will be critical to meet Net Zero targets, with heating being one of the most challenging issues to face. This is the main conclusion of the [Pathways to Net Zero](#) [9] report which outlines a strategy for decarbonised gas in 2050. We need to ensure that development is located in the right places and designed to the right standards to ensure we can best accommodate this change. A key element is increasing district heating networks, which can also help address concerns about energy security and supply, and fuel poverty. The Council has begun work on this, including an initial assessment of places with greatest potential for heat networks. The most viable places typically have high heat users or producers, few physical obstacles to cross and future development sites. Within these places we will expect that development delivers or enables connection to a heat network. Where networks are not viable, we will expect that micro-generation and heat recovery technologies associated with individual properties be delivered.

A range of other measures have been considered to ensure the plan maximises its potential to mitigate and adapt to the climate and ecological emergency. The approaches proposed by the other main issues discussed in this document fit into the three key themes described in our preferred approach shown in Issue 'Addressing the Climate and Ecological Emergency'.

Issue

Addressing the Climate and Ecological Emergency

Preferred approach

Efficient Use of Heat

We believe that the introduction of a new policy to support the delivery of more sustainable forms of heat is needed. The policy would require all planning applications to consider the feasibility of meeting the development's heat demand through a district heating network or other low-carbon alternatives. This could be based on a hierarchy, whereby new development located next to significant heat sources will need to be designed so that it can connect to an existing heat network or a wider planned network at a future date. Any land required to deliver

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9   http://www.energynetworks.org/assets/files/gas/Navigant%20Pathways%20to%20Net-Zero.pdf

the heat network will be protected and incorporated into the design and layout of the proposed development. Where a heat network is not viable, the use of micro-generation and other heat recovery technologies will be encouraged.

Over the coming months we will be taking a closer look at the places which are most viable and will provide greater detail and guidance at Proposed Plan stage on the opportunities and what will be required from stakeholders to deliver them. In the meantime, we have prepared a more general guidance note (insert link) which sets out the direction and expected approach to energy provision, systems and energy efficiency of developments.

Getting the right development in the right place:

Each theme below provides an explanation of how the Plan proposes to tackle the Climate and Ecological Emergency, and provides sign posts to the relevant Main Issues elsewhere in this document.

1.   By considering the functions that different villages, towns and the city serve, we have developed a spatial strategy and settlement hierarchy. This enables us to target development to the most sustainable locations, ensuring it has the lowest impact on the climate as possible, and can help us adapt to where climate change may present future challenges. You can read more about this in 1.2.3 'Growing the most sustainable places'.
2.   In working out where the best places are to direct new growth, we've looked at the infrastructure that is needed to support new communities and have targeted growth primarily to where there is existing capacity, and set out how we expect developers to tackle capacity issues to enable new communities to live in well-served climate smart (sustainable) places. You can read more about this in 1.2.5 'Matching development with infrastructure capacity'.
3.   We've looked at how the places we create influence the quality of environment that people live, work and play in. Aspects such as design and placemaking can have a significant impact on how successful a place is, such as providing everyday needs sustainably. We've also considered the needs of our changing, ageing population which will impact on the climate as a greater number of older people rely on more social and health care services. You can read more about these topics in 1.2.8 'Placemaking' and 1.2.9 'Meeting the needs of an ageing population'.
4.   We've also taken a detailed look at all of the sites proposed through the Call for Sites process and those in the aIMFLDP to ensure we support the sites that have the least impacts in terms of climate change, and that we don't support sites where predicted climate change would present a future risk that could be avoided, such as flooding. You can read the assessments for all the sites in the Main Issues Report online at (insert link).

Ensuring our transport network is fit for purpose

Ensuring new development is easily accessible by healthy, sustainable travel options was one of the underpinning elements of the previous theme, but we also took a detailed look at how transport decisions made through the planning system can impact our lives and determine the travel choices we can make. Being one of the biggest contributors to the climate and ecological emergency, both through direct emissions, and by making it harder or easier to choose sustainable travel options, the future of transport is being carefully considered through the Plan. You can read more about this in 1.2.6 'Creating a more healthy, sustainable transport network'. You can also read more detail in the Transport Appraisal supporting this Main Issues Report (insert link).

Managing biodiversity and ecology

The Planning (Scotland) Act 2019 requires that securing positive effects for biodiversity will be one of the six key outcomes of the emerging National Planning Framework 4 (NPF4). This is recognised in the Council's indicative Regional Spatial Strategy submitted to Scottish Government for consideration as part of NPF4. The biodiversity and ecology of the Inner Moray Firth area is one of its greatest assets. There is urgent need to address this requirement by developing a mechanism that not only secures no net loss to biodiversity, but can deliver biodiversity improvements over the short, medium and long term.

Maximising the potential of our green and blue infrastructure

How we develop our settlements influences how much green and blue (water) space we use or safeguard, with such spaces often important for storing carbon and therefore mitigating climate change. They are also places where we can reduce our carbon footprint by creating attractive local destinations for leisure and recreation, and can increase resilience of communities and reduce carbon footprints through local food production and other activities. We've considered how the current policies safeguard green and blue infrastructure and what we think is a good way to bring this approach up to date. You can read more about this in 1.2.7 'Identifying and safeguarding valued, local green space'. You can also see how we've considered green and blue infrastructure through the site assessments online (insert link).

Biodiversity Enhancement

It is recognised that all development can have implications for biodiversity and there are particular challenges to meet the emerging requirements to secure positive effects for biodiversity. There are already mechanisms in place that help to mitigate the on-site implications of development for biodiversity but gaining net enhancement to biodiversity assets is more difficult. Currently much development in Highland delivers an overall net loss

to biodiversity by, for example, removing and fragmenting habitat and sealing soil surfaces. Delivering improvements to biodiversity on site is extremely challenging especially in small and medium scale development sites. In order to achieve this emerging requirement for positive effects for biodiversity, we are considering the principle of applying a developer contribution towards addressing biodiversity improvements. This could potentially involve quantifying the total area of sealed soil surface on greenfield development sites and applying a fixed sum contribution per hectare of sealed land.

Alternative approach

Some alternatives approaches to addressing our Climate and Ecological Emergency have been considered and are described in the other Main Issues referred to above. The approach to a lot of the topics, such as flood risk, are required to be considered by law and therefore there is no reasonable alternative approach.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.2 Supporting a strong, diverse and sustainable economy

The regional economy is facing challenges from several directions: the immediate impacts of the COVID 19 crisis, the potential major changes resulting from Brexit, and the need to respond to the Climate and Ecological Emergency. Whilst the longer-term effects of these are very difficult to predict, the timely review of this Plan offers an ideal opportunity to set out a collective medium to long term vision.

Respond, recover, progress and transition

This Plan proposes a number of measures for growing the longer term economy of the Inner Moray Firth area. It incorporates measures which help respond and recover from the immediate pressures of the COVID 19 pandemic and pave the way for the area to progress and ultimately transition to a green circular economy - low carbon, resource efficient and socially inclusive.

The Council has set up a Recovery Board to agree prompt actions for addressing the impacts of the pandemic. This is starting with the identification of short-term measures and projects to address the most pressing issues.

Outlined below are some of the main ways in which we will support the economy to grow. We've sign posted the relevant Main Issue where more information can be found:

- The role of town centres will continue to form a fundamental part of the sustainability of our communities and this is only reinforced by the COVID 19 crisis. As set out in Issue 'Town Centre First Policy' we must provide flexibility to allow town centres to adapt to various pressures but also protect and enhance their role to ensure they are at the forefront of social, economic and cultural activity.

- The tourism and leisure industry is pivotal to the Highland economy, contributing almost 1 billion pounds annually, but major sections of it are vulnerable to the current restrictions. The need for coordinated investment is highlighted in Issue 'Growing Sustainable Tourism' and sets out a number of ways in which the Plan can help support the industry to grow over the long term.

- Supporting a strong and dynamic construction industry is important not only for the jobs it supports but for the creation of new homes to ensure social equality and wellbeing. As set out in 1.2.3 'Growing the most sustainable places' and 1.2.4 'Delivering affordable housing' sections, we a proposing a number of changes which promote development, overcome barriers and ensure sites are viable.

- With crisis brings opportunity and we want to grab hold of the positive social and environmental impacts brought about by recent changes to the way we work, travel, interact with each other and use key facilities.   As set out in 1.2.6 'Creating a more healthy, sustainable transport network', we want to take full advantage of the shift towards active travel, connecting our towns and villages and making them easier to get about.

- 1.2.5 'Matching development with infrastructure capacity' highlights importance of digital connectivity and this has been brought to the fore with the need for people to work from home, online education and more people dependent on online shopping and accessing services.

- Employment land sets out our analysis of the commercial property markets and the steps we are proposing to provide the range of opportunities needed to support the recovery and deliver our vision for the economy.

Beyond the immediate crisis, the Highlands will remain one of the best places in the UK to grow and thrive. As set out in the Highland Council's indicative Regional Spatial Strategy (iRSS)[10] submission to Scottish Government for the National Planning Framework (NPF) we aim to further diversify and transition to a green economy. We will achieve this by capitalising on our unique natural assets to create high value jobs and capture opportunities such as the ability to become a global centre of excellence in the renewable energy and reinforcing Highland's reputation as one

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10   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/927/national_planning_framework

of the world's most attractive tourist destinations. As we plan for the recovery and transition of our economy, we must recognise the shift in business models and embrace the digital and climate change opportunities that have arisen to transform our economy to be robust and able to thrive.

Employment land

The Plan needs to identify an adequate supply and location of employment land to meet the needs of existing and new businesses in all sectors. The Monitoring Report set out in more detail the supply and demand pressures within the commercial property market. Within the industrial property market, there is a relatively old stock of premises but demand remains high. Without investment, this may pose a major risk to the area's future competitiveness and could restrict economic growth. Work is currently underway to redevelop the former Longman landfill site for business and industrial uses, however, this alone will not meet all future needs.

Pressure for new distribution and warehousing centres has been on the increase across the UK. Whilst previously these would typically have been located in the Central Belt, there is growing pressure for these facilities within the Inner Moray Firth area. We think that strategic employment sites which have good transport links, such as Inverness Airport Business Park and the former Longman landfill, provide some of the best locations for these uses.

There also appears to be strong demand for, and significant under investment in, small scale industrial units which serve local businesses and communities. These units form an important part of the commercial property market providing incubator and start up opportunities. Opportunities to acquire land and investment in opening them up for industrial uses in or around Inverness will be needed to reverse recent trends and address the demand.

Demand for office property, however, even before the COVID crisis, was comparatively weak. The stock of office premises is comparatively modern and plentiful in key locations but there is a distinct variation in land values across the Plan area. Reports suggest that a lasting impact of the current crisis could be that more people will work from home and demand for suitable home working environments will increase. For these reasons, we do not think there is a need to allocate significantly more land for office development.

The aIMFLDP allocated strategic business sites at Inverness Campus and Inverness Airport Business Park and large industrial sites along the Cromarty and Moray Firths mainly for the energy sector or other single user enterprises. Whilst sites at Nigg, Invergordon Harbour and the Campus have seen considerable growth since the plan was adopted, many of the other sites have not come forward at the rate expected.

The retail property market in the Inner Moray Firth area continues to be relatively subdued due mainly to changing consumer shopping behaviour. Where proposals do come forward, the Town Centre First Policy (insert link) will help to direct developments towards our established town centres.

To capture the unique economic and regeneration opportunities arising from a multi-billion pound, 50 year pipeline of renewable energy projects in the Moray Firth, an ambitious and collaborative partnership of private and public sector organisations known as Opportunity Cromarty Firth[11] has been set up. The consortium is currently preparing a bid for Freeport status, which forms part of UK Government's post-Brexit economic growth strategy. This would stimulate significant economic activity and employment, and attract inward investment in Highland communities, thereby driving economic recovery. At present we believe that, on the whole, the large amount of employment land currently allocated around the Cromarty Firth is sufficient. However, a degree of flexibility will be required to maximise the opportunities which may arise in the future.

Issue

Strategic and Other Employment Sites

Preferred approach

We will continue to support and allocate larger, strategic employment development sites such as Cromarty Firth Port, Former Longman Landfill site and Inverness Campus. Sites which are not located within a Main Settlement, including Inverness Airport Business Park, Nigg and Whiteness, will be identified as Economic Development Areas (EDAs) in the Plan.

We also wish to allocate a wide range of other business and industrial land within the Plan's Main Settlements. Typically, these will support the expansion or development of vacant plots within existing business and industrial parks.

We want to provide greater support for smaller scale multi-purpose industrial/business uses. Due to the lack of sites being suggested for these uses, to achieve this we think there is merit in introducing a new policy that requires a proportion of land to be made available for such uses in larger development sites. This policy would only be applied in areas which have been identified as having sufficient levels of demand for employment accommodation. If land is made available then there is greater scope for new models of developing and managing these

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11   https://opportunitycromartyfirth.co.uk/

properties, such as a community trust.   Small scale commercial buy-to-let is also increasingly attractive to investors as they can offer a good rate of return, particularly as residential buy-to-let has seen many regulatory and tax changes recently.

To help provide certainty and reduce the risk for developers and businesses, we think that the Plan should introduce a framework for Masterplan Consent Areas (MCAs) to be identified. These would essentially grant up-front consents for planned development. MCAs would be a useful, proactive tool to promote and incentivise investment in development by providing consent in advance for specified types of development, in carefully defined circumstances, in a particular area. It can also set out up-front costs and help coordinate the delivery of necessary infrastructure.

Non-preferred approach

The allocation of business and industrial land is a fundamental requirement of preparing a local development plan and we don't think there is a reasonable alternative. However, we could choose not introduce a new policy which would require developers to set land aside for employment uses. Instead, we could rely on developers to incorporate these opportunities at the planning application stage. We don't think this is suitable as there is unlikely to be a financial incentive to developers to do so.

In responding to the current crisis and in preparation for BREXIT, other options are set out below. However, with the economic and social changes resulting from the COVID crisis still emerging we are currently presenting these as alternative suggestions. We will be considering the options further as more information becomes available. In the meantime we would welcome your comments on them and any further suggestions you may have:

- We could introduce a more flexible change-of-use policy to better respond to changes experienced in certain working environments. For example, we could give greater support for the conversion of business or retail parks to other uses, such as residential or industrial space.
- The Council could also introduce a more supportive policy for larger scale inward investment developments which generate significant employment wherever they are proposed unless they cause significant adverse effects in terms of infrastructure provision or environmental impacts. This would go further than HwLDP Policy 43 Business and Industrial Land which already provides a level of flexibility for emerging industries in where they can be located.

Growing Sustainable Tourism

Alongside the continued growth of other sectors, the tourism industry has fast become an important factor in sustaining employment and economic activity in both urban and rural communities. Whilst the COVID 19 outbreak has presented major challenges to the industry we are hopeful that the Highland tourist experience becomes more sought after than ever before and it bounces back. We therefore want to set a positive framework for development which increases the length of peoples stay and visitor spending and promote a wider spread of sustainable tourist attractions.

In March this year, the [new national tourism strategy](#)[12] was published which aims to create "responsible tourism for a sustainable future". We support this vision and want to support the sector to grow. To achieve this we need to make the most of our existing assets and ensure that they deliver high quality, sustainable and authentic visitor experiences.

Within the Inner Moray Firth area, there are a number of well known tourist destinations but no more so than Loch Ness. A report in 2018 found that Loch Ness generates nearly £41 million each year towards the Scottish economy. Despite this, it is widely acknowledged that it is underdeveloped compared to similar internationally renowned destinations and has greater potential for the local economy and the communities surrounding the loch.

Issue

Growing Sustainable Tourism

Preferred Approach

We think the Plan should designate Loch Ness and its surrounding area as an 'Area of Outstanding Tourist Potential' to provide greater support for tourism development, lever funding for the infrastructure that supports tourism, and to help strengthen local communities. This designation would be particularly supportive of proposals which diversify the geographic spread and type of destinations, facilities and attractions on offer. By encouraging visitors to explore further it will help lengthen their stay in the area and avoid the adverse effects of certain destinations reaching saturation point.

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12   https://scottishtourismalliance.co.uk/scotland-outlook-2030-download

The designation of the area reflects work currently being undertaken by Highlands and Islands Enterprise, with support from The Highland Council, Scottish Canals and Visit Scotland, to produce a strategy for Loch Ness to coordinate public-sector support and resources and stimulate private-sector investment in the area. A draft of this strategy and consultation on it is expected during 2020.

There are a number of other places within the Plan area which have an underdeveloped tourism sector and we think there is great scope for the expansion and creation of sustainable tourist facilities.   For example, whilst Easter Ross is on the North Coast 500 route, it is generally considered underdeveloped from a tourism point of view. Land at North Sutor which has been put forward for a mixture of leisure facilities and tourist accommodation based around the prominent landscape setting and rich heritage could provide a major boost to the area. Opportunities for tourism developments continue to exist along the A96 corridor with existing consent at Castle Stuart and Delnies. Fort George also presents an opportunity for conversion to tourism and leisure uses if and when the Ministry of Defence ceases its military operations on the site.

Alternative approach

We could do nothing to manage the adverse environmental and other effects of increasing visitor numbers. However, we believe that better management and some diversion of these pressures coupled with investment in infrastructure facilities to support them, would be a preferable option.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.3 Growing the most sustainable places

Population change and housing needs

The latest forecasts for the Inner Moray Firth's future population indicate stability rather than rapid growth. This is due in main to a fall in birth rates, but the forecast level of net migration and the decline in average household size are other key factors affecting the number of future households and future housing needs. We recognise that very recent and impending issues at the national

level – namely the implications of the COVID-19 pandemic and Brexit – and early evidence indicates that the pandemic may be leading to increased levels of net migration in Highland as people look to relocate to more rural areas.

Evidence indicates that affordability of housing is a really important issue for the Highlands. At the national level access to private market housing is not possible for a higher proportion of the population than previously considered (link to Monitoring Report – Shelter report). In Scotland 62% of new households are unable to afford open market housing. As such, the need for affordable housing is increasing. The next section explores in more detail the steps that could be taken to address the ongoing affordable housing needs.

The issues outlined above are critical in identifying the amount of land that needs to be allocated for all types of housing in the Inner Moray Firth area. The Monitoring Report (insert hyperlink) gives more detail on this topic.

The most recent Housing Need and Demand Assessment (HNDA) published in 2015 showed that 11,829 new homes were considered to be required over the next 20 years including affordable housing. It should be noted that these totals are averages over 20 years and that the 2015 HNDA on which they area based assumed that the backlog of existing affordable need (defined as 1,555 units in 2015) would be cleared over the first 10 years.

As set out in more detail within 1.2.4 'Delivering affordable housing', the HNDA shows that, despite increases in the supply of new affordable homes, it has not cleared the backlog of people on the Highland Housing Register and the need for affordable housing has actually risen.

Table 2 20 Year Inner Moray Firth Plan Area Housing Requirements Based on 2015 HNDA

	Inverness HMA	Easter Ross HMA	Mid Ross HMA	Nairn HMA	Wester Ross HMA	Plan Area Totals
Affordable Sector	2,919	509	589	341	57	4,415
Open Market Sector	5,164	702	910	538	100	7,414
Total	8,083	1,211	1,499	879	157	11,829

The figures shown in Table 2 '20 Year Inner Moray Firth Plan Area Housing Requirements Based on 2015 HNDA' have influenced the number and housing capacity of preferred sites in this Main Issues Report. In the next few months, significantly more up to date information will become available,

including the 2018 based population and household forecasts, and will be incorporated into the new HNDA. Once confirmed, this evidence will help produce the 2020 HNDA which, along with feedback from the MIR consultation and further consideration of local circumstances and needs, will be used to inform the finalised totals and site selection within the next stage of the Inner Moray Firth Local Development Plan.

Issue

Housing Requirements

Preferred approach

We believe that the Plan should identify enough land to accommodate the number of dwellings which will be estimated using the process set out in the above paragraphs and detailed in the accompanying Monitoring Report (insert link). We believe that using the 2020 HNDA along with feedback from the MIR consultation and further consideration of local circumstances is the optimum way to plan future housing requirements.

Alternative approach

We could increase or decrease the future housing requirements by varying the assumptions we make in our forecasts. However, we would need to be informed of better data or evidence to support an alternative approach.

Settlement hierarchy

Taking account of the housing requirements explained above, the other main issue of tackling climate change, and the importance of protecting the viability and vitality of our town and city centres, we believe that the Plan should direct a higher proportion of future development to more sustainable locations. In practice, this means classifying the places within the Inner Moray Firth into a hierarchy according to their sustainable travel mode, access to existing and planned future, employment, education, public transport and other services and infrastructure capacity. This is shown inTable 3 'Settlement Hierarchy'. In simple terms, the Plan intends to direct most future growth to the settlements with the best existing or committed future access to all these facilities, services and opportunities. Unsurprisingly, Tier 1 settlements include Inverness City, existing towns with good active travel and public transport links such as Beauly and Tain, and the committed new town at Tornagrain. In contrast, Tier 4 settlements offer very limited employment, transport options and services. As these settlements will be almost exclusively dependent on car based transport, we don't think that they are appropriate locations for any significant development. Because of

these considerations Cawdor, Contin, and Inchmore are suggested for reclassification from main settlements to growing settlements . However, within all these settlements, we will still support the principle of infill development, refurbishment of existing properties and redevelopment of brownfield (previously developed) sites. This hierarchy has influenced the number and size (likely housing capacity) of preferred sites in this Main Issues Report.

Table 3 Settlement Hierarchy

Scale of Growth	Sustainability	Hierarchy	Tier	Settlements/Locations
Strategic	Most sustainable	Main Settlements	1	Alness, Beauly, Dingwall, Invergordon, Inverness City, Muir of Ord, Nairn, Tain, Tornagrain.
Modest	Sustainable		2	Ardersier, Conon Bridge, Drumnadrochit, Evanton, Fort Augustus, North Kessock.
Local	Partially sustainable		3	Auldearn, Avoch, Croy, Fortrose and Rosemarkie, Kiltarlity, Maryburgh, Seaboard Villages, Strathpeffer, Tomatin.
Limited	Least sustainable		4	Cawdor [1], Contin [1], Cromarty, Culbokie, Dores, Inchmore [1], Kirkhill, Munlochy, Tore.
"Infill" only	Growing Settlements	Growing Settlements	5	Abriachan, Balnain, Barbaraville, Cannich, Farr/Inverarnie, Foyers, Garve, Gorthleck, Hill of Fearn, Inver, Milton of Kildary, Marybank, Portmahomack, Rhicullen, Tomich, Whitebridge.
Typically single unit development	Countryside	Countryside	6	All housing groups not otherwise classified as part of a settlement. Wider open countryside (no general restriction). "Hinterland" open countryside (general restriction on housing).

1.   Settlement suggested for reclassification from main settlements to growing settlements.

Issue

Settlement Hierarchy

Preferred approach

We believe that the Plan should direct most future development to environmentally sustainable and economically viable locations. The hierarchy of settlements and other locations in Table 3 'Settlement Hierarchy' and the varying level of future growth envisaged for each place should help achieve this. The settlements listed in the hierarchy which have an asterisk in front of them are proposed to be reclassified from Main Settlements to Growing Settlements.

Alternative approach

Each listed place could be moved to a different tier of the hierarchy. However, we believe that we have assigned each place to the correct tier on the basis of its relative accessibility (by environmentally sustainable travel modes) to existing or committed future facilities, services and opportunities.

Growing settlements

The aIMFLDP contains an "Other Settlements" policy which, within a defined list of places, supports a lesser scale of development than within the "Main Settlements" but a more positive approach than within the countryside. Settlements currently included are places which have/had at least one community facility (e.g. a school or public hall). We intend to bring our policy approach to these smallest settlements in line with our other local development plans for Highland. We wish to call them "Growing Settlements" and not use the existence of a facility as the sole reason for including or excluding places from the list. Instead, we will only include places that have an established, sizeable cluster of development, have some development pressure, few environmental constraints to development, and facility/service networks that can accommodate additional housebuilding. Because of these new criteria we do not think that Advie, Ardross, Bunchrew, Croachy, Cullicudden, Daviot, Dochgarroch, Easter Kinkell, Ferness, Invermoriston, Kilcoy, Kildary, Kilmorack, Mulbuie, Pitcalnie, Resolis and Struy should be identified as Growing Settlements. Development proposals in places which are not take forward as Growing Settlements will be

considered against the Housing in the Countryside[13] planning policy. Dochgarroch has economic rather than housing development potential and therefore we propose (in the economy main issue section) that it be referenced as a growth area for sustainable tourism rather than as a Growing Settlement.

These are listed as Tier 5 settlements in Table 3 'Settlement Hierarchy'. For each potential "Growing Settlement" this Main Issues Report sets out draft key issues and placemaking priorities for comment. Images are included for each settlement but please note that this is for illustrative purposes only and that the geographic extent of these images is of no policy significance. Once finalised, these will be applied in determining planning applications in these places.

Issue

Growing Settlements Policy

Preferred approach

We wish to support the principle of limited "infill" development within the Plan area's smallest settlements listed in Tier 5 of Table 3 'Settlement Hierarchy'. The following draft policy would apply to planning proposals within these settlements.

Development proposals that are contained within, round off or consolidate the listed Growing Settlements will be assessed against the extent to which they:

- take account of the issues and placemaking priorities identified for the individual Growing Settlements;
- are likely to help sustain, enhance or add to facilities with proposals being located within active travel distance of any facility present;
- are compatible in terms of use, spacing, character and density with development within that settlement and demonstrate high quality design;
- can utilise spare capacity in the infrastructure network (education, roads, other transport, water, sewerage etc.) or new/improved infrastructure can be provided in a cost efficient manner, taking into account the Council's requirement for connection to the public sewer other than in exceptional circumstances;
- avoid a net loss of amenity or recreational areas significant to the local community; and,
- would not result in adverse impact on any other locally important natural or cultural heritage feature, important public viewpoint/vista or open space.

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13   https://www.highland.gov.uk/directory_record/683410/housing_in_the_countryside

Proposals which demonstrate overall conformity with the above criteria will be in accordance with this policy.

Alternative approach

We could instead carry forward the policy from the aIMFLDP unchanged which would support development in a longer list of places. We don't favour this alternative approach because we believe that these are places in less environmentally and economically sustainable locations and/or they lack a reasonably sized, clustered, settlement core.

Self build housing development

As well as setting out the amount and location of new housing, it is important that we provide people with a choice of housing types. We discuss meeting the needs of the ageing population and delivering affordable housing in other parts of this Main Issues Report but we believe that this diversity should also include housing land within our main settlements for self build. We define self build as where an individual commissions or (whether acting alone or with other individuals) is personally involved in the design and construction of a dwelling that is intended to be the individual's main residence once it is built. This includes "custom build" which is essentially self build homes facilitated in some way by a volume housebuilder.

Research shows there is strong demand for self build and that there are a number of benefits which can be gained from increasing the supply of plots. In recent decades, within the Inner Moray Firth, like within many other parts of Scotland, new housing has been largely delivered by "volume" housebuilders. Whilst this is an important part of the housing market, there is growing recognition that self build in urban areas can play an important role in the supply of new housing. As it would essentially be a new part of the market in some urban areas, it could complement volume housebuilders in promoting faster sales and quicker build out rates. It could also provide a much needed boost for smaller sized developers which have declined in number significantly over recent years. Furthermore, self build can contribute towards placemaking by delivering greater diversity and innovation and enhancing the character of our neighbourhoods. Evidence shows that as self build is often taken up by older people looking to build a more suitable home it can even be a good way of providing housing for an ageing population.

As one of main barriers to self build has been the lack of available sites, we think that the best way to increase the number opportunities is by introducing a new policy which requires a certain proportion of land to be available for self build within larger housing developments. We recognise that the detail of such a policy and how it's applied must be subject to consultation with the development industry and all other affected parties. We also don't want such a policy to undermine

the economic viability of sites confirmed through this Plan. To ensure this, the policy's application will be subject to proof of demand for self build in that part of the Inner Moray Firth. The forthcoming, statutory register of interest in self build will provide the evidence necessary to apply the policy. Where registered demand doesn't translate uptake of plots over a defined period then that portion of the site would revert back to general demand housing.

Self build may also be appropriate in rural areas especially where suitable sites are not available within nearby settlements. We will analyse the future statutory register to see where such interest originates and whether both the affordable and market sectors can meet it on allocated sites within settlements or whether a more flexible approach is required for example by broadening the suggested policy approach below to include consideration of smaller development sites in rural areas.

Issue

Self Build Housing Policy

Preferred approach

We intend to introduce a policy that will require developers to provide a proportion of self build plots on larger housing sites. Our draft policy for discussion is as follows.

Each developer of a large (50 or more dwellings) planning application will be required to safeguard and adequately service part (a minimum of 10 % of the application's total dwelling capacity) of that application site for self build plots. The exact number, location, size and shape of those plots should take account of the Council's statutory register of self build housing interest - i.e. best match the supply of plots to local, registered demand for those plots. Where registered demand doesn't translate into self build plot sales over a minimum, adequate marketing period of one year then that part of the site will revert back to being available for general demand housing. The Council will provide guidance to accompany this Plan which will define self build, adequate marketing, and adequate servicing. The guidance will also explain the relationship of this policy to those on placemaking, affordable housing and developer contributions.

Alternative approaches

This is a developing planning policy topic so there are several alternatives on which we invite comment:

- Should the site size threshold and minimum percentage requirement be higher or lower than 50 dwellings and 10 %?

- Could more self build housing development be achieved by earmarking certain housing sites only for self build development particularly where the landowner agrees?
- Should the public purse subsidise or otherwise financially incentivise (for example by reducing developer contributions for the same application) the provision of self build plots?

Town centres

One way to achieve this Plan's Outcomes in terms of connectivity, accessibility, viability and reducing the climate change effects of travel is to safeguard and bolster town centres. A network of centres that support the right scale and mix of commercial, leisure, other employment, and community uses appropriate to that part of the Plan area will help achieve these Outcomes.

Town centres are at the heart of communities and are best placed to be hubs for a wide range of activities. Appropriate development within our town centres has the potential to improve their vitality and viability. This can also ensure that investment in our communities is directed in a way that is most beneficial to residents, employees and visitors to our towns.

Issue

Town Centre First Policy

Preferred approach

In order to protect and enhance the vitality and viability of town centres our preferred approach is to introduce a new "Town Centre First Policy". This will effectively replace the "Promoting and Protecting City and Town Centres" in the aIMFLDP. The new Town Centre First Policy will direct all development which generates significant footfall to be located, in the first instance, within the main town centres of the Plan area. The aim is to provide greater support for town centre living and attract a mix of uses which are active throughout the day and evening. This reflects Scottish Planning Policy (2014) and the Scottish Government's Town Centre Action Plan.

At this stage we are proposing to roll forward the Town Centre First policy from the Council's other two area Local Development Plans. However, there is likely to be a rise in vacancy rates as a result of the COVID 19 crisis and we would like to know whether you think there is merit in greater flexibility given to change of use applications as a means of making making our town centres more adaptable.

We think that the Policy should apply to the town centres which play a particularly important economic, social and cultural role within their respective settlement and hinterland. Within the Plan we therefore have identified boundaries for the following places: Alness, Beauly, Dingwall, Invergordon, Inverness City Centre, Muir of Ord, Nairn and Tain. We intend to define town centre boundaries for these places and show them on the maps in the Settlements section of the Plan, also to undertake town centre health checks for them, and use the findings of these checks to develop town centre strategies which will deliver improvements for these centres.

Our draft policy for discussion is as follows:

Development that generates significant footfall will firstly be expected to be located within the town centres of Alness, Beauly, Dingwall, Invergordon, Inverness City Centre, Muir of Ord, Nairn and Tain as identified by the boundaries on the maps in 3 'Main Settlements'. When identifying sites a sequential assessment will be required demonstrating that all opportunities for regeneration through reuse or redevelopment of existing sites or buildings have been fully explored.   Should the scale and type of proposal not be suitable for these locations, edge of town centre locations are favoured second, and then out of centre locations that are, or can be made, easily accessible by a choice of transport modes. This sequential approach does not apply to established uses and land allocations.

Significant footfall developments include:

- retail,
- restaurants,
- commercial,
- leisure uses,
- offices,
- hotels,
- community and cultural heritage facilities, and public buildings including libraries, education and heathcare facilities.

If the Council considers that a proposal may result in an adverse impact on the vitality and viability of any listed town centre, the developer will be required to produce a retail or town centre impact assessment tailored to reflect the scale and function of the town centre in question. The Council will only support proposals accompanied by competent assessments that demonstrate no significant adverse impacts.

A flexible and realistic approach will be required when applying this sequential assessment, however, developers need to consider how appropriate the nature of their proposal is to the scale and function of the centre within which it is proposed. Exceptions may be made for any ancillary uses that support existing and proposed developments.

Proposals for conversion of buildings to residential use in town centres may be supported, providing there is no loss of existing or potential viable footfall generating use(s). Proposals for conversion to residential use must demonstrate that the property has been marketed for its existing use at a reasonable price/rent without success for a minimum period of 6 months. For vacant upper floor conversions (excluding hotels) support may be given without the requirement for marketing where it can be demonstrated that the proposals would contribute towards a balanced mix of uses.

Alternative approach

We could introduce a more flexible change-of-use policy to respond to likely increases in vacancy rates resulting from the current crisis. For example, we could give greater support for conversion of ground floor retail in town centres and/or reduce the amount of time a property needs to be made available for sale/rent from 12 months to 6 months. These changes are presented as "Alternatives" as we think further information is needed to determine whether it is suitable or not.

Non preferred approach

Given that Scottish Planning Policy requires us to embed the Town Centre First Principle in our plans then we don't think that there are many reasonable alternatives. Certain changes to the Policy above may provide a more permissive approach but this would probably reduce the level of protection the policy provides. A more rigid approach would be to identify town centre boundaries for all our Main Settlements.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.4 Delivering affordable housing

One of the current priorities facing Highland is how best to increase the number of homes so that everyone has a good quality home that they can afford and that meets their needs. Whilst the Scottish Government is making significant resources available for building affordable homes, the Housing Needs and Demand Assessment (HNDA) (insert link) shows that the need for an affordable home is outstripping the supply. Difficulties in securing land for affordable housing at the right time and in the right places is one of the main limiting factors. Overcoming this issue can help to tackle poverty, give people greater stability and better future prospects.

The Scottish Government has committed to build 50,000 new affordable homes by March 2021 via the More Houses Scotland programme. This scheme has allocated £45.6m to Highland for 2019/20 and £48.4m for 2020/21. Investment has not been confirmed for future years but it is anticipated that funding levels will continue at a similar level.

In the last five years, 1,683 affordable homes have been built in Highland, of which 1,047 have been in the Inner Moray Firth area. Many of these developments have helped to regenerate our town centres, bring brownfield land back into use and sustain communities. The HNDA shows that, despite this increase in supply, it has not cleared the backlog of people on the Highland Housing Register and the need for affordable housing has actually risen. This highlights the ongoing problem of affordability and the need to properly understand the constraints and find new ways of increasing supply.

Figure 1.1 'Affordable housing completions' shows that the delivery of affordable housing has not had an impact on reducing the backlog need. It should be noted that the backlog need is taken as a snapshot taken on 1st April each year and changes daily but the indicative figures allow reasonable assumptions that the housing affordable programme needs to be increased to reach a point where the backlog can be cleared.

Figure 1.1 Affordable housing completions
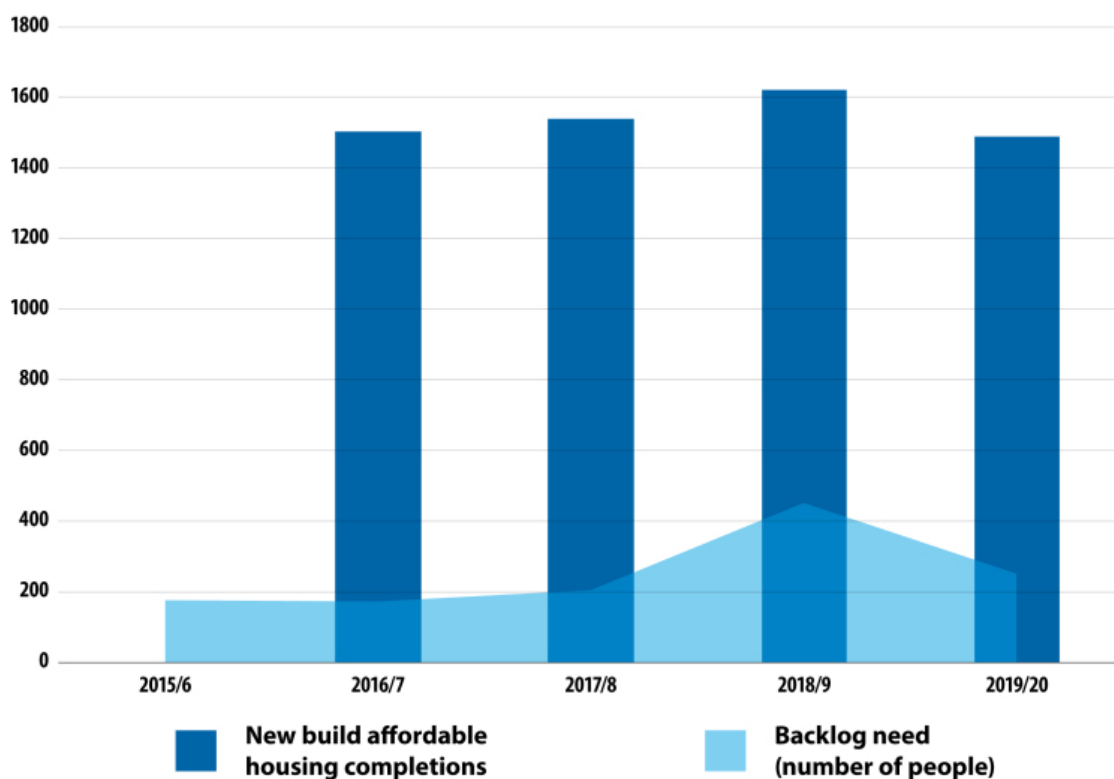
One of the main challenges affordable housing providers face in building new housing is their ability to secure land for development where it's most needed. This is a particular problem in Inverness which has the highest proportion of the need in Highland. Whilst the aIMFLDP allocated a very large amount of housing land, much of it is controlled by volume house builders. In most cases, affordable housing providers are unable to properly compete in securing ownership/options on strategic development sites. This has caused a reliance the business plans of the volume house builders for a key part of the ongoing supply of affordable housing. In some situations the release of the land for affordable housing has been programmed in later phases of development.   It is felt by some in the housing industry that without a radical change in the housing market it will be difficult to overcome these issues.

As it currently stands, the Council has limited ability to address this issue on its own. In terms of planning policy, certain mechanisms that we have available at present, such as increasing the required level of affordable housing contributions, will likely impact on the viability and effectiveness of specific sites. There is also a potential that these measures could be counterproductive if they result in private sector development not coming forward.

We will continue to work with the Scottish Government and others to assess the barriers to affordable housing delivery and introduce innovative ways in which they can be overcome, such as the use of the landbank and infrastructure loan fund to secure sites. New mechanisms will be required, however, to realise the next stages of the affordable housing programme and provide the social infrastructure needed to support the communities.   For example, greater ability to forward fund essential infrastructure would better allow for long term Council capital programming.

To help tackle these challenges for affordable housing delivery the Scottish Land Commission recommend a number of approaches including enhancing the ability to assemble land, streamlining the compulsory purchase process and introducing land value capture measures. The introduction of a strategic investment fund or other innovative finance model would also help ensure that local authorities and housing associations can better complete with private sector house builders in the development market. Better resourcing would allow the public sector to lead in assembling and preparing land and then delivering the necessary levels of affordable housing and securing a diversity of builders. More control over the delivery of the site allows for greater priority on placemaking, infrastructure delivery and a more effective response to the climate emergency. Within the Inner Moray Firth area, this could be best applied to strategic sites , such as land identified in the Inverness East Development Brief.

Issue

Affordable Housing Interventions

Preferred approach

We think that the best way to deliver affordable housing is a combination of one or more of the following:

- We are considering the introduction of a new policy which would set a higher level of affordable housing contributions in places which are shown to be in greater need. The results of the HNDA would help to influence the rate and geographical area to which it would apply. At present we consider an increase to 35% would be most appropriate and apply only to Inverness settlement development area. The policy would continue to apply to developments of 4 or more units but will represent an increase from the current 25 % which is the standard rate across areas of Highland. We would welcome further input during the Main Issues Report consultation from key partners and the private sector to fully assess this proposal.
- Embed within the new policy, measures which ensure that the delivery of affordable housing components of private sector developments are prioritised within the early phases

of development. Opportunity could also provided for a much higher percentage of affordables being delivered within the first phase and taper down after that, as long as they were still designed to be mix communities. As we are mindful of maintaining the viability of allocated development sites this option could form an alternative to an increase in percentage of affordable housing contributions rates.

- As outlined in other Main Issues we support the principle of higher density development as a means of improving placemaking and creating more sustainable, sociable and accessible neighbourhoods. Increasing density can also make developments, such as affordable housing schemes, more viable.

Non preferred approach

We could continue to allocate a very generous supply of housing land - as has been the approach over at least the last decade - to increase competition between landowners and result in reduced land values. However, this approach has been shown not to deliver the scale of affordable housing required and it has led to significant challenges to site delivery and infrastructure planning.

We could also not increase the affordable housing contribution from 25 %. However, the current framework is not creating enough opportunities for addressing the affordable housing need in the most pressurised areas.

Whilst older plans allocated land exclusively for affordable housing, this option is not preferred because it may lead to suggestions from landowners for "exceptions" sites in unsustainable locations and result in a segregation of tenures.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.5 Matching development with infrastructure capacity

In planning future communities there needs to be close alignment between development and the management of existing and new infrastructure. The capacity of existing services and infrastructure, such as schools, energy, transport and community facilities, and making best use of these, are critical factors for where development can happen. It is increasingly important that digital infrastructure is prioritised as much as infrastructure for physical connectivity. This is not only an

essential part of creating and maintaining successful places, but is also required to help achieve other Plan Outcomes, such as creating sustainable transport networks and addressing the Climate and Ecological Emergency.

Highland Council's proposition for the future, which is set out in their indicative Regional Spatial Strategy (iRSS) [14] submission to Scottish Government for the National Planning Framework (NPF), shows the importance of infrastructure for the Highland region. It is hoped that the new combined NPF4 and Scottish Planning Policy will help to create a consistent approach to the coordination and delivery of high quality digital infrastructure. The Inner Moray Firth area provides infrastructure and services for not just those that live, work and visit there but to serve the wider Highlands and Islands. In this regard, we have been working closely with other stakeholders to identify the necessary infrastructure requirements to support our communities and deliver the collective outcomes. This has helped shape the spatial strategy [15] and Table 3 'Settlement Hierarchy' which show where we want to direct growth.

There are certain places, particularly in Inverness, which currently have infrastructure capacity issues but which will continue to be the focus of housing and commercial development. Whilst this will lead to further pressure on the Council's capital programme for infrastructure provision, it will require a jointed up public sector / private developer funding to help address the issue.

The Plan will set out the headline infrastructure requirements for settlement and site allocations through Placemaking Priorities and Developer Requirements. The Plan's Delivery Programme will be used to monitor and implement the infrastructure needed to support the future growth of our communities. As set out in the new Planning (Scotland) Act, the Delivery Programme will be embedded as a multi agency tool to help coordinate and better manage resources and infrastructure delivery. In combination, these measures will help deliver the infrastructure needed using tools such as conditions on planning permissions and developer contributions.

There are undoubtedly, however, major challenges in delivering suitable infrastructure, both to serve existing communities and to support new ones. It is difficult to reconcile the ability to address existing priorities and support the area to grow. We want to know if you think there are other ways in which to make the most of infrastructure and how to manage this issue.

The financial viability of development is a fundamental consideration for us as it not only ensures an effective land supply but that infrastructure will be delivered when needed. Much of the debate about development is about infrastructure provision or financial payments required to provide

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14   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/927/national_planning_framework
15   https://highland.objective.co.uk/ecc/editor_frame.html

the services affected by the development. As the costs of construction are largely fixed, in many situations the viability of a site will depend on the landowner's understanding the infrastructure obligations and having realistic expectations as to the value of their land.

As identified in other Main Issues, higher densities can not only play an important role in promoting active travel, providing better access to facilities, creating good street design and supporting an ageing population, but also make developments more viable. This would help allow for key infrastructure, such as active travel connections, bus services or playparks to be delivered earlier.

Issue

Matching Development with Infrastructure Capacity

Preferred approach

We think that the following measures will help to ensure that development and infrastructure capacity are better aligned:

- Maintain the aim of directing growth to areas that have existing spare infrastructure capacity.
- To ensure that measures are put in place for the delivery of high quality digital infrastructure as a standard requirement for all development.
- Set out the headline infrastructure requirements for settlement and site allocations through Placemaking Priorities and Developer Requirements.
- Promote the Delivery Programme as the principal tool for monitoring and implementing the infrastructure needed to support the delivery of the proposals and sites shown in the Plan.
- Avoid allocating sites where we consider that the full infrastructure requirements will likely make the site unviable.
- Introduce development frameworks at Proposed Plan stage for larger allocations to ensure placemaking and infrastructure requirements are better understood by key stakeholders.
- Make sure that development proposals clearly demonstrate that mitigation measures are in place to deal with all infrastructure implications, including surface water drainage and transport requirements.

- Take forward a similar "Delivering Development" policy as included in WestPlan [16] and CaSPlan [17] to help ensure that development is taken forward in a coordinated and sustainable way with infrastructure provision delivered when needed.

- Ensure that higher density developments commit to the earliest possible delivery of key infrastructure.

- Identify a more specific indicative housing capacity for each allocated development site tailored to the particular circumstances of the site and settlement and require a stronger justification if a developer proposes to vary significantly from it.

Alternative approach

We think that the measures outlined above are all reasonable and represent good practice in better matching development with infrastructure capacity. As a result, we haven't set out alternatives, but please set out how you would do things differently.

Feedback

Do you agree with the way in which we seek to manage infrastructure delivery? What do you think of these measures or are there other things which can be done to ensure infrastructure is delivered?

1.2.6 Creating a more healthy, sustainable transport network

Everyone in Highland should have fair access to affordable ways to travel sustainably. This means walking, wheeling, cycling and public transport should be the safest, most efficient and reliable choices for moving around.

This Main Issues Report proposes an ambitious new strategy for transport in the Inner Moray Firth area. This topic is far-reaching and therefore goes into detail in this section about the range of transport issues the Plan needs to address. It seeks to transform transport to tackle the climate and ecological emergency by ensuring road space is shared equally between the different transport modes that need it and that sustainable transport options are prioritised, but do not unfairly disadvantage those that do need to travel by car. A detailed Transport Appraisal accompanies this work and was used to inform the preparation of this part of the Main Issues Report.

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16   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/582/west_highland_and_islands_local_development_plan
17   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/283/caithness_and_sutherland_local_development_plan

1 Vision, Outcomes and Main Issues

The evidence is compelling that we cannot simply continue to build more roads to tackle congestion and encourage never-ending growth in car travel. Looking back at the places that have been delivered in the Plan area, road infrastructure has led to impacts on the quality of some places that are now dominated by the roads that serve them, making walking, wheeling, cycling and public transport less safe, attractive and competitive than driving, creating car-based living. We think this approach has to change to tackle the range of problems society now faces. The Scottish Government too is recognising this need for a new approach through its Programme for Government commitments, including £1 Billion for sustainable transport, and its change of emphasis through its second Strategic Transport Projects Review (STPR2). We have set out our transport ambitions at the Highland level through our [Indicative Regional Spatial Strategy](#) [18].

The COVID 19 pandemic has imposed restrictions on people's movement. The Scottish Government provided direct funding to support communities to physically distance through their Spaces for People programme. The Highland Council secured £1.97m from this fund, with around a quarter of this committed to the IMF area. The pandemic has resulted in there being less traffic on the roads and more people walking, wheeling and cycling. This positive experience in our communities of sustainable travel, coupled with a rapid transition to home-working for many people, means the future of how and when we travel is uncertain, but that we now have the chance to redefine the norm, and create a transport system that can respond to the global challenges we face. We want to use the experience of travel during the current pandemic to demonstrate the transformation that is possible to move to cleaner, healthier travel choices. It gives us the opportunity to provide a stepping stone to change the emphasis of the Council's future investment programme towards supporting sustainable transport infrastructure, such as walking, wheeling, cycling and public transport. This does not necessarily mean increasing costs, but rather making best use of new infrastructure to support lots of modes of travel, for the same cost as building traditional transport infrastructure, such as roads, for example by allocation lane space for bike lanes, bus lanes and vehicle lanes where space allows.

Creating a fair and equal transport network

To ensure fair and equal access to transport, we think that new development should be located close to facilities and services and well connected to a sustainable transport network. Higher density (more homes in a given area) development can contribute to this by ensuring more people are close to sustainable transport corridors, meaning they support demand for, and use of, these modes. [Research](#) [19] has shown that over a million people in Scotland live in transport poverty and most of the areas at risk are in Highland. The homes earning the least have the lowest access to a private car, meaning they depend more on other forms of transport ([only 41 % of households](#)

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18   https://consult.highland.gov.uk/portal/dp/npf4/npf4?pointId=5619115#document-5619115
19   https://www.sustrans.org.uk/media/2880/transport_poverty_in_scotland_2016.pdf

earnings are up to £10,000 have access to a car [20]). Therefore the way we grow our villages, towns and city will determine how fair it is for different people in our communities to access education, employment, services and leisure opportunities. Beyond poverty, our transport system must also be designed to meet the needs of our communities, regardless of age, disability, gender, race, religion or belief, or sexual orientation.

Using sustainable transport to tackle the climate and ecological emergency

By creating a transport network that promotes more sustainable ways to move around, we can decarbonise transport and reduce its impact on climate. The Highland Council's Climate and Ecological Emergency declaration brings transport into the spotlight because it is at the heart of enabling Highland to become a low emissions region. The Scottish Government's National Transport Strategy highlights that 37 % of greenhouse gas emissions in Scotland were from transport and that 40 % of these emissions come from cars.

Figure 1.2 Breakdown of Scotland's transport emissions adapted from NTS2, Scottish Government, 2020

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20   https://www.transport.gov.scot/media/45852/sct09199889061.pdf
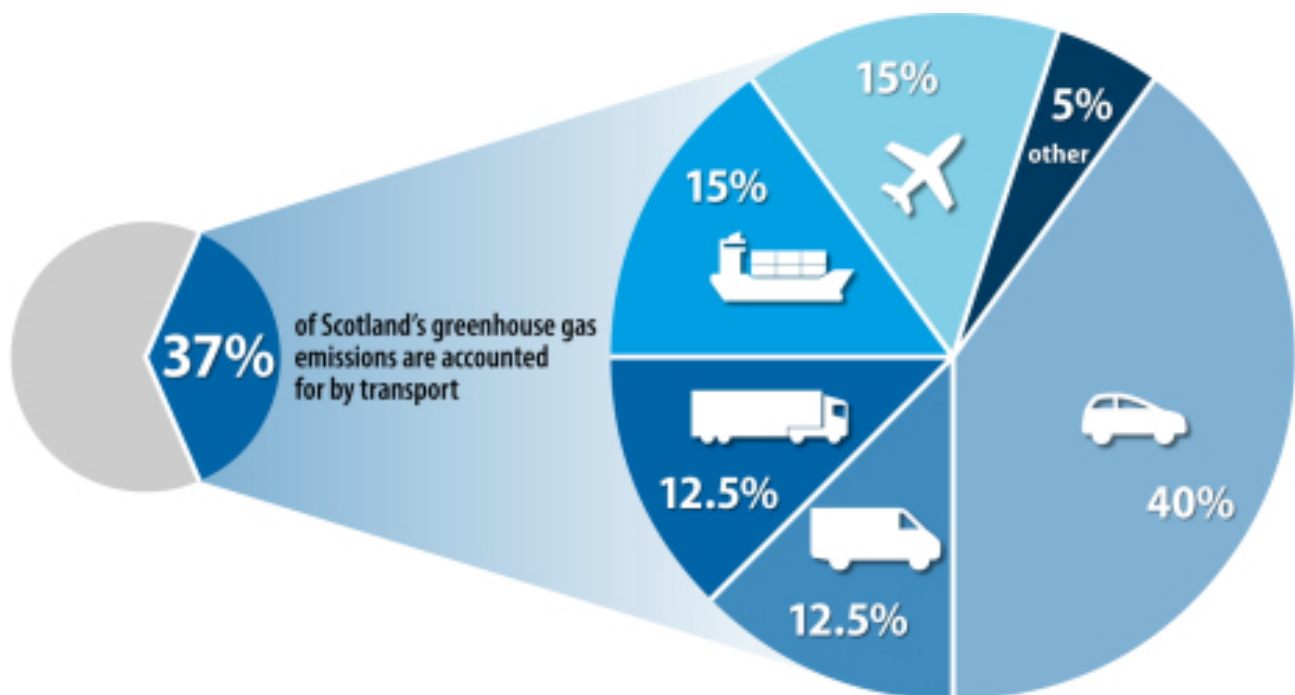
1 Vision, Outcomes and Main Issues

Recent local [research](#)[21] reinforces these national findings, with car-based travel in the Inverness area shown to have the same carbon footprint as the Council's entire operation. Being the most populated and urban area in Highland, this new plan gives us a major opportunity to help tackle the climate and ecological emergency as well as creating greater resilience to change and disruption by enabling a wider range of transport options in the network.

Tackling congestion and enabling a transition to electric vehicles

To tackle congestion, we think the transport network should provide a fair share of space for all types of transport. Tackling congestion is challenging, particularly in some of the area's towns and Inverness, where it is most pronounced. It is [widely accepted](#)[22] that building more roads for cars to tackle congestion does not work. This is because as people see new roads being created, they choose to drive and fill up the new road space, causing more congestion. For a lot of the congested parts of the Inner Moray Firth area there simply is not enough room between buildings and other land uses to build more space for cars, and the costs are often prohibitive. Creating a more varied transport network where walking, wheeling, cycling and public transport are genuinely competitive with driving will make more efficient use of available space in a fairer way for all road users. It will reduce the amount of vehicles on the road, and therefore create more space for those that do need to travel by car.

Whilst new technologies like low-emissions and electric vehicles have potential to decarbonise transport ([excluding the carbon-intensive manufacturing process](#)[23]) they will not solve the issue of congestion because the same amount of road space is required for these vehicles as is required for fossil fuel vehicles. However, it is important to recognise the potential for such technologies to tackle the area's rural challenges where the only viable mode of transport is often private car. Combined with a range of active travel and public transport interventions in the more urban places, electric vehicles, and in future other alternative technologies such as hydrogen fuel, can contribute to tackling carbon emissions associated with transport. Therefore infrastructure to support the transition to electric vehicles is required during the lifetime of the Plan.

Infrastructure needs for most electric vehicle charging can be met at home, where vehicles are parked in driveways and access to private chargers is easier. For people without off street parking, and where there will be need to charge in public places, including tourists to the region, further

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21   https://www.highland.gov.uk/download/meetings/id/73609/
      item_15_-_inverness_greenhouse_gas_inventory_report
22   https://tps.org.uk/public/downloads/96cgz/%20Better%20Planning,
   %20Better%20Transport,%20Better%20Places%20August%202019.pdf?
23   https://theicct.org/sites/default/files/publications/EV-life-cycle-GHG_ICCT-Briefing_09022018_vF.pdf

investment is required. Work is currently underway with the Council's Climate Change Team, the Energy Savings Trust and Transport Scotland to deliver, and explore further opportunity to deliver, such publicly accessible electric vehicle charging infrastructure across the Plan area.

Using sustainable transport to improve health and wellbeing

To ensure we have a healthy, active population, walking, wheeling and cycling should be the easiest way to move around. We think the location of new development and quality of active travel infrastructure are key to unlocking the area's potential for being more active. There are strong links between inactivity and people's health, with UK Government guidance [24] now recommending that adults are active every day and for at least 150 minutes per week. Motorised transport is directly linked to immediate and longer-term health hazards due to inactivity, air and noise pollution, and increased social isolation, as well as collisions and injuries.

Figure 1.3 Health hazards linked to motorised transport
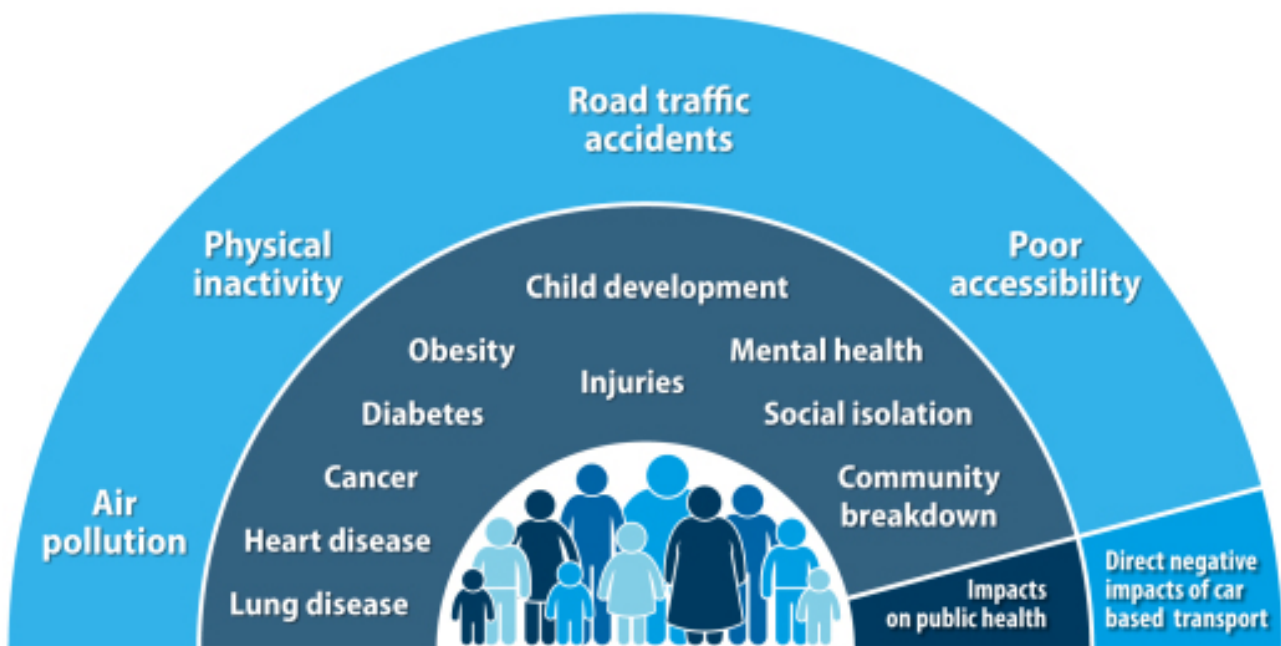
In Scotland, the Active Scotland Delivery Plan [25] commits to ensuring less use of cars and more journeys by walking, wheeling and cycling. Recent research [26] has shown that the health benefits of cycling in Inverness alone results in a reduction of up to 11,000 GP appointments and reduction in harmful pollutants that reduce air quality, a particular problem in the City Centre, which has a

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24   https://assets.publishing.service.gov.uk/government/uploads/System/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf

25   https://www.gov.scot/publications/active-scotland-delivery-plan/pages/6/

26   https://www.sustrans.org.uk/bike-life/bike-life-inverness/

designated [Air Quality Management Area](#)[27]. The Council is actively working to tackle air pollution and has an [Air Quality Action Plan](#)[28], the first Action in this plan is to promote smarter travel choices. This means that the more the Plan can do to increase walking, wheeling, cycling and public transport, the better chance we have of improving people's health, including through improving air quality.

Developing a new transport strategy

We think the Plan needs to be supported by an ambitious new transport strategy that ensures the creation of a modern, sustainable transport network. This is expressed in the transport strategy drawing below. We think the best way to deliver this strategy is to identify a range of sustainable transport interventions for the Plan area, and to create an ambitious new transport policy, as indicated in the preferred approach shown in Issue 'Sustainable transport interventions'.

Map 1.1 Transport Strategy

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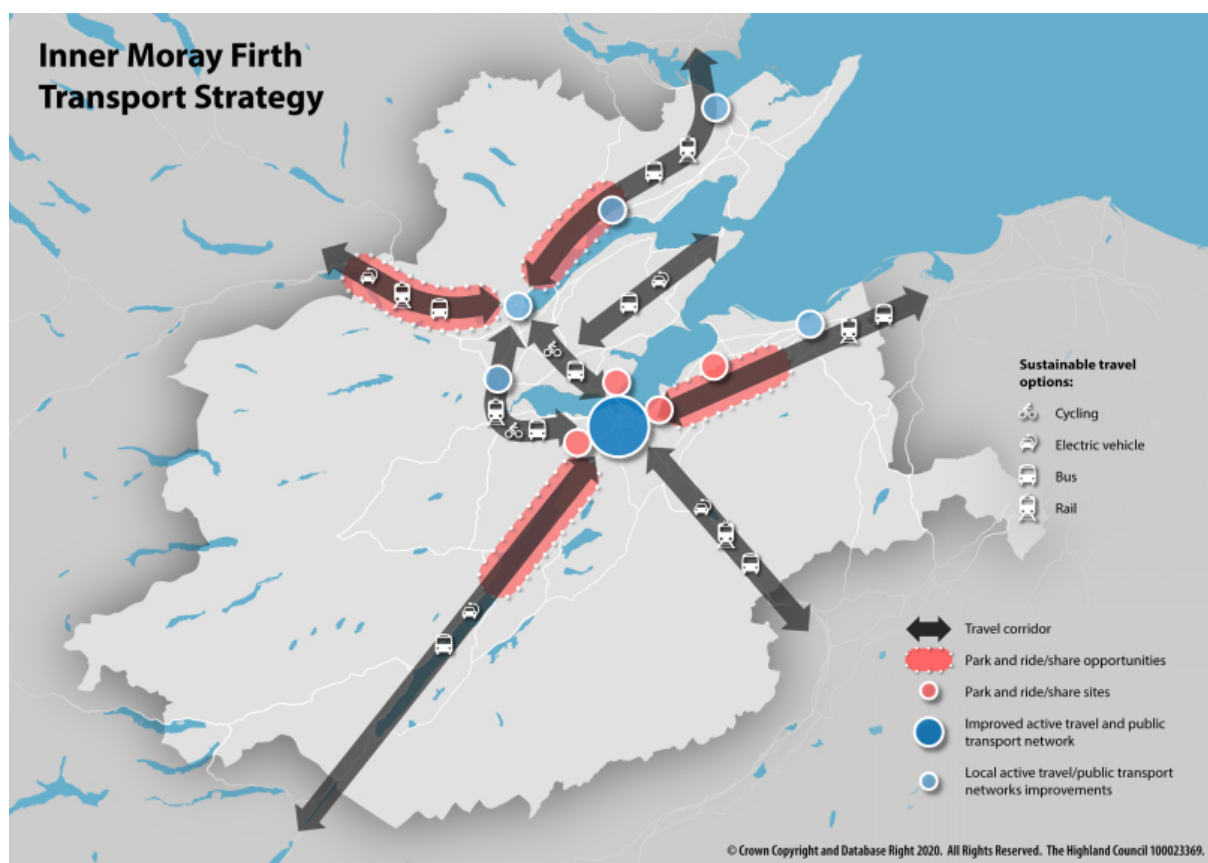
27   https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=374
28   http://www.highland.gov.uk/download/downloads/id/16577/inverness_action_plan.pdf

Issue

Sustainable transport interventions

Preferred approach

We think the Plan needs to deliver a vastly improved and sustainable transport network that maximises the shift to walking, wheeling, cycling and public transport wherever possible. The Plan needs to continue to ensure that new developments mitigate impacts on roads but must simultaneously create a more ambitious and sustainable transport network. The Plan will identify the range of measures and requirements for transport in settlement maps, including between-settlement active travel connectivity, developer requirements for sites, and in the transport policy described in Issue 'Sustainable transport policy'.

For Inverness this means:

1. Creating an exemplar fully connected active travel network.
2. Prioritising buses on the network, particularly at known congestion points.
3. Creating a network of park and ride sites at entrances to the city.
4. Effective management of city centre parking to support a transition to sustainable travel.
5. Improving traffic management technology to make the existing transport network as efficient as possible.
6. Lowering parking standards where an acceptable level of public transport and active travel provides a viable alternative.

For other towns and villages this means:

1. Maximising the use of and connections to existing and planned new rail halts and bus stops.
2. Creating mini park and ride/park and share sites on strategic routes.
3. Delivering active travel improvements to connect communities within and between towns and villages.
4. Lowering parking standards where an acceptable level of public transport and active travel provides a viable alternative.

For more rural places this means:

1. Maximising the opportunities to utilise rail halts and park and ride/park and share sites.

2. Supporting communities to identify and deliver active travel connections that will make sustainable travel a realistic option.

3. Supporting the delivery of electric vehicle charging infrastructure at key destinations that rural communities can benefit from.

Alternative approach

The alternative option would be to continue with the current approach to transport, which relies on assessing individual planning applications against the relevant Highland-wide Local Development Plan policies. This is not considered to be an appropriate approach because it does not follow a particular strategic direction and will not deliver the step-change in travel behaviour that is required to create better, more sustainable places that respond to the climate and ecological emergency and other challenges set out in this section.

Issue

Sustainable transport policy

Preferred approach

We recognise that all development has impacts on the transport network and therefore an up to date, overarching transport policy is required:

1. To receive planning permission, development proposals must be able to demonstrate that walking, wheeling, cycling and public transport are at least as, or more, competitive than travelling by private car. The methodology will be based on journey time competitiveness to key employment and other destinations and the requirements for developers and how it will be assessed will be set out in full in the sustainable transport policy. Work has already been undertaken about this and can be read in the Transport Appraisal supporting the Main Issues Report.

2. Travel Plans should be used to support the transition to sustainable transport. Any development considered likely to have significant trip-generating impacts (e.g. more than 50 house development or more than 1000 m^2 retail, office, business or industrial development) should be supported by a Travel Plan that sets out:

    a. Clear and measurable targets and objectives to deliver sustainable transport for that development.

    b. What range of measures will be implemented to mitigate the impacts of development and deliver sustainable transport.

 c. What monitoring and reporting framework will be used to quantify the effectiveness of measures implemented, and when this will take place and be reported.

 d. How the existing transport context has determined the measures considered most effective to deliver sustainable transport.

 e. What mitigation will be implemented if such measures are found to be ineffective through monitoring, and how these will be monitored and reported.

We think a suite of innovative, effective options are available to developers to achieve sustainable transport, as set out in the Transport Appraisal supporting this Main Issues Report.

3. Developer contributions should be secured to support the transition to sustainable transport. Sites allocated in the Plan should ensure future development enables travel behaviour using the most sustainable transport possible and we think that developers should therefore contribute financially to the delivery of sustainable transport infrastructure and services:

 a. Where no specific intervention is required, a standard contribution per house or floorspace equivalent will be sought towards improving active travel and public transport infrastructure in the settlement or catchment area.

 b. Where an active travel or public transport priority scheme is identified in the Plan, financial contributions towards their delivery will be sought from development proposals within the settlement, or defined catchment, on a per home or floorspace equivalent basis.

Alternative approach

The alternative option would be to continue with the current approach to transport, which relies on assessing individual planning applications against the relevant Highland-wide Local Development Plan policies. This is not considered to be an appropriate approach because it does not follow a particular strategic direction and will not deliver the step-change in travel behaviour that is required to create better, more sustainable places that respond to the climate and ecological emergency and other challenges set out in this section.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.7 Identifying and safeguarding valued, local green space

All communities in the Plan area should be connected by and have access to high quality green and blue spaces. This will enable people to use natural, healthy environments and help mitigate and adapt to climate change.

Green infrastructure

We call the natural features and areas of land valued because of their amenity, recreational and natural heritage value green infrastructure, and believe such features should be safeguarded.

This is a Main Issue because green infrastructure needs to be better recognised for its essential roles in mitigating and adapting to climate change and delivering social, environmental, health and placemaking benefits. To properly safeguard green infrastructure an up to date and comprehensive audit is required. The policy framework also needs to be brought in line with current thinking because the current approach was prepared in 2012 and national policy and legislation has since changed[29].

We have defined two types of green infrastructure we wish to protect and propose a different, better way of identifying and safeguarding each.

Greenspaces are the mapped areas in the Plan that have formal protection from development. They are the discrete and easily identifiable green and blue (waterside or waterbody) spaces that contribute to the character and setting of a place and provide amenity, biodiversity and recreation benefits as well as climate change mitigation and adaptation opportunities. Greenspaces may overlap with areas designated for other purposes such as Conservation Areas or environmentally protected places such as Sites of Special Scientific Interest.

Green networks are different from greenspaces. They may serve one or more of the same functions as greenspaces but in a less formal or more strategic way. Green networks provide the physical, visual and habitat connections for greenspaces and therefore ensure accessibility for both wildlife and people. Development can be more flexibly accommodated within or adjacent to a green network as long as the network's connectivity and integrity is maintained and it is incorporated into a development as a positive landscape and design feature.

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29   The new approach proposed would result in Highland-wide Local Development Plan policies 74, 75 and 76 being superseded for the Plan area.

Identifying Greenspace

The aIMFLDP includes maps for each main settlement that show valued green spaces. However, the methodology used to identify these spaces can be improved in the new Plan to produce a more comprehensive and accurate audit of these formally protected areas. Greenspaces are not shown in this Main Issues Report because we want to hear people's views on how the audit should be undertaken and invite suggestions for new greenspaces to be considered for safeguarding. The next version of the Plan for consultation will show the proposed areas of greenspace we think should be safeguarded as a result of the audit undertaken, this will include all of the existing safeguarded greenspace shown in the aIMFLDP.

Issue

Identifying Valued, Local Greenspace

How can we improve the way we audit and safeguard greenspace?

The [Highland Council's Audit of Greenspace](#)[30] was undertaken in 2010/11 and, alongside other areas identified in preparing the aIMFLDP, provided the basis for allocating greenspace. The 2010 Audit provides a starting point for IMFLDP2 to consider what greenspace should be safeguarded alongside the suggestions received through the recent Call for Sites consultation and other available sources (e.g. The Native Woodland Survey of Scotland).

Our preferred approach

We think that all potential greenspace being considered should be assessed consistently by using specific criteria, and that a greenspace should be identified when one or more of the following criteria is met:

Table 4 Greenspace assessment criteria.

Criterion	Explanation
Helps define the **character of the local area**.	It helps to make the local area unique and identifiable, this may be in combination with other features, like historic environment features or prominent local landmarks or landforms.

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30   https://www.highland.gov.uk/downloads/download/306/
         highland_greenspace_audit_settlements

Improves the **connectivity** of the local area.	Paths and spaces in the area are linked together by the greenspace.
Provides **amenity value**.	It supports local biodiversity. It gives the local area an attractive setting and/or outlook from adjacent uses and routes.
Gives local people **easy access** to the natural environment to socialise and interact.	The area can be used by a range of people for informal social interaction.
Provides services and/or facilities that can help mitigate or adapt to the effects of **climate change**.	Trees, drainage features, wetlands and floodplains are protected from development and provide means of mitigating climate change impacts and/or can help to absorb carbon.
Provides an area for **sport or recreation**.	Sports pitches, playing fields and golf courses facilitate access to greenspace for outdoor play and recreation.
Has potential for **community food growing**.	Area can be utilised for formal or informal community food growing, which may include the potential to deliver new allotments.

Alternative approach

We have also considered carrying forward the areas identified in the aIMFLDP unchanged. However, we think we can produce an objective assessment of greenspace in the Plan area and include consideration of new greenspace suggestions we received through the Call for Sites [31] process.

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31   https://highland.maps.arcgis.com/apps/webappviewer/index.html?id=38617f77829c4ee6a8a611e8a64d2fe1

Safeguarding Greenspace

When we have identified valued, local greenspace, we need to safeguard it using a suitable planning policy so that any planning application that proposes development of it, or would result in a reduction in its total area or quality, can be properly managed. We think that the draft policy approach below will be more comprehensive and simpler to apply than the existing policies [32].

Issue

Safeguarding Greenspace Policy

Our preferred approach

We think that all greenspace identified through the Greenspace audit should be safeguarded from development, including indirect impacts that could affect its quality. For sports and recreation sites only, there may be circumstances where development may be acceptable if:

- It can be demonstrated that development on a minor part of a sports or recreation greenspace would not affect its use and potential for sports and recreation; or
- It can be demonstrated that development on a sports or recreation greenspace would result in the provision of an equivalent or improved replacement facility that is at least as convenient to access and maintains or increases overall playing capacity of the particular activity in the settlement.

Alternative approach

We have also considered retaining our existing policies on this topic unchanged but we believe that a more comprehensive and consistent approach is needed.

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32   The areas that are identified in the adopted IMFLDP are safeguarded by HwLDP Policy 75: Open Space and HwLDP Policy 76: Playing Fields and Sports Pitches. The former protects high quality, accessible and fit for purpose open space from development and the latter safeguards these recreation assets from development. Policy 75 and 76 both allow certain exceptions where it may be acceptable to allow development on these areas (read the policies Highland-wide Local Development Plan These HwLDP policies would be superseded by a Policy for the Plan area.

1 Vision, Outcomes and Main Issues

Protecting Green Networks

We believe Green Networks should be identified, safeguarded and where possible enhanced because they make up the natural infrastructure that is important to the physical, visual and habitat connectivity of green spaces and therefore their accessibility to people and wildlife [33]. Green Networks were not identified in the aIMFLDP, but will be identified in this Plan at its next stage. This work will involve identifying green networks in main settlements and showing them on the settlement maps so that those areas of green infrastructure that connect built-up areas to greenspace and to the surrounding countryside are protected and enhanced through developer requirements on allocated sites and in placemaking priorities identified for settlements. The approach will follow the broad principles and methodology set out in our Green Networks Supplementary Guidance [34].

Issue

Green Networks Policy

We think it is important to include the following new Green Networks policy to ensure that development proposals are consistently assessed against this topic [35].

Preferred approach

We will identify Green Networks on the Plan's main settlement maps and safeguard the physical, visual and habitat connectivity of these Networks. A development proposal within or close to an identified Network will be assessed the extent to which it:

- affects the physical, visual and habitat connectivity (either adversely or positively) of that Network; and
- offers any mitigation of these effects.

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33 HwLDP Policy 74 requires that green networks are protected and enhanced and it maps out broad areas where Green Networks should be identified in future. The Green Networks Supplementary Guidance sets out the further detail of this policy.

34 http://www.highland.gov.uk/download/downloads/id/2959/green_networks_final_supplementary_guidance.pdf

35 This approach would be complemented by other HwLDP policies, such as Policy 52: Principle of Development in Woodland and Policy 51: Trees and Development, which would remain part of the development plan's suite of policies that a proposal would be assessed against. Appendix 2 of the Green Networks Supplementary Guidance sets out how the green network and coastal and landward trails will be identified and delivered. It is proposed that this would be updated and replicated in IMFLDP2.

By connectivity we mean the continuity and accessibility of that Network for people and wildlife whether those users wish to enter, pass through, travel along or derive public amenity value from that Network because of its visual continuity and accessibility.

Alternative approach

We have also considered retaining our existing policies on this topic unchanged but we believe that a more comprehensive and consistent approach is needed.

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.8 Placemaking

Across Highland in recent years, lifestyles and social attitudes have been changing, with more people wishing to live in a friendly and welcoming community which has quick and easy access to shops, work places, community facilities and local services, allowing them to spend less time commuting and more time with family and friends. These changing attitudes are resulting in suburban low density, edge of town living becoming less attractive.

The Council approach and that of most large housebuilders and commercial developers hasn't responded to these evolving trends. Instead, the development industry has continued building stand-alone housing schemes which poorly connect with each other and the wider areas. Concurrently, shopping, business districts and leisure areas have been built on their own out-of-town sites, distinct from residential areas thereby requiring users to drive to access them. This in turn has led to an increase in traffic which has resulted in traffic congestion around our city and towns and has been detrimental to our air quality and individuals health.

A number of policies already exist in the Council current LDPs which were designed to combat these issues, but they are now dated, piecemeal and poorly understood by the public, the development industry and decision makers, resulting in them being applied in an inconsistent manner.

Figure 1.4 Placemaking principles

Moving forward, our ambition is the creation of sustainable, good quality, well-designed and connected urban communities. To achieve this, we believe we need one clear policy outlining our commitment to quality design, site layouts and developments being built at the right density in the right location, all of which combine to achieve good placemaking whilst at the same time protecting our finite natural and bio-diversity resources.

In order to do this, we need to embed the fundamentals of placemaking into every stage of the design, planning and development process and will do so through the use of various "Design Tools". Individual Design Tools are designed to be used independently at different stages of the development process, but should come together to attain a single cohesive and comprehensive scheme. The Design Tools are split between the initial design phase and the regulation process and include:

Table 5 Placemaking design tools

Initial Design Tools to guide and shape the development from the outset:

Development Briefs	Provides clarity and guidance on the development requirements and principles for a specific site.
Masterplans	Provide a clear and detailed direction for development, considering the relationship between uses, buildings, open spaces, and all transport routes, through the use of detailed maps and plans.
Charrette	An intensive planning session where citizens, designers and collaborate work together to prepare a single vision for a site/development.
Design Review Panel	Impartial and multi-disciplinary, expert review panel designed to provide constructive feedback at the pre-application stage of the planning process.
Pre-application Advice[1]	Council provided advice and information on the issues which require consideration as part of the planning application process.
Scheme Design Codes	Used to set out a clear "code" for specific element of a design (e.g street layout). A valuable tool to deliver and achieve specific design principles established earlier in the development process, by making clear what can and can't be done
Local Place Plans	A plan developed by the community which gives them the opportunity to develop proposals for the development and use of land in the place where they live.
Placemaking Audit	New Highland Council tool to be trialed through the MIR for developers and Council to use to guide, inform and assess new developments.
Regulation Process Tools to describe, illustrate and support the development during assessment:	

Design and Access Statements[1]	Design and Access Statements must be submitted to accompany all planning applications for permission for Major or National developments as defined for Development Management purposes.
Design Statements[1]	Design Statements must be submitted for those applications defined as "local developments" for Development Management purposes within the following areas; • Conservation Areas. • National Scenic Areas. • Site of a Scheduled Monument. • Curtilage of a Category A Listed Building. • Historic Garden/Designed Landscape.

1.   These tools are statutorily required for various types of development.

Each tool has a different purpose, value and outcome and very few schemes will require every Design Tool to be used. However, each tool is designed to involve a creative and collaborative process which engages all interested parties.   The aim and function of each is to create and deliver sustainable, distinctive and connected developments and wider communities, which respects and enhances the site, wider location and natural resources. Details of each Design Tool is contained in Appendix 1: 'Glossary' and further information can be found within numerous Planning Advice Notes and Guidance available on-line[36] .

Issue

Placemaking Policy

Preferred approach

All development proposals are expected to follow a design-led approach to achieve sustainable, high quality placemaking and be sited, designed and laid out to create successful, healthy places that make a positive contribution to the architectural and visual quality in which they area located and encourage good physical and mental health, whilst helping to reduce health inequalities, improve people's wellbeing, safeguard the environment and support economic development.

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36   https://www.gov.scot/collections/planning-advice-notes-pans/

All applications should include a written statement outlining which Design Tool(s) have been utilised, how the scheme evolved and the changes adopted as a result of using the Design Tool. Furthermore, for development proposals of 4 or more dwellings and major scale non housing applications developers must submit a completed Placemaking Audit based to the criteria outlined in Appendix 3: 'Placemaking Audit'. Conformity will all the "Essential" criteria must be demonstrated as part of the application submission and adequate demonstration of also meeting the Audit's "Desirable" criteria will classify the proposal as having a net positive effect, conformity with this policy.

Alternative approaches

- We could could continue to apply our existing policies on this subject but they are dated, piecemeal, not easily understood by the development industry and decision makers, and applied in an inconsistent manner.
- We could have fewer "Design Tools".
- We could apply the requirements of the Placemaking Audit to fewer or more types/scales of development.
- We could make fewer or more criteria outlined in the Placemaking Audit "Essential" or "Desirable".

Feedback

Do you have any general feedback on this section? Please let us know.

1.2.9 Meeting the needs of an ageing population

In common with the rest of Scotland, the Plan area's population profile is ageing; in the near future, a higher proportion of the total population will be in the older age groups. In particular, within Highland, there will be a higher than national average increase in those 75 or over as the "baby boom" generation moves through their 70s and because of increased life expectancy the need for care and specialist housing will increase. Based on current projections it is expected that by 2035 the older population (75 and over) in Highland will have increased by 49% since 2019. Although many people will be able to live at home for longer there will be an increasing need for suitable, accessible accommodation and associated support services. A significant proportion of the elderly population is likely to live alone, bringing a particular set of challenges in terms of housing and care.

1 Vision, Outcomes and Main Issues

There is clearly a need to address the issues associated with an ageing population in terms of housing needs. A partnership approach will be required to deliver a vision to support accommodation options that will allow people to stay in their own homes or communities for as long as possible and there is a role for the Local Development Plan to play in this.

Initial discussions have been held internally in the Council; however, there is a need for wider cross-Council and Community Planning partner collaboration to determine what measures will be required to address the issues. There are already examples of innovative models of accommodation across Highland however their capacity is much less than current need. There is also a need for the Council to lobby the Scottish Government to update the Housing for Varying Needs guidance. It is out of date in relation to developments in inclusive design, design for dementia and autism, as well as for disabled people using larger wheelchairs. It assumes wheelchair users and those who use mobility aids need "specialist housing" with integral support rather than mainstream housing. Again this is out of date with the housing requirements and aspirations of the majority of wheelchair users. Nationally there is a call for the Scottish Government to give due consideration of the potential to develop a single cross tenure statutory design standard that provides for an enhanced space standard.

The affordable housing section of the Council's Developer Contributions Supplementary Guidance already requires that between 15 and 25% of the 25 % affordable housing requirement should be "wheelchair liveable", which means a prescribed series of building design changes to make it easier for an elderly and/or disabled householder to use and move around the accommodation. It is acknowledged that the costs of developing this kind of housing is higher. Therefore it is suggested that a more proactive approach is needed to ensure that public funding is increased and better matched to the need which is forecast. The affordable housing section of the Council's Developer Contributions Supplementary Guidance already requires that between 15 and 25% of the 25 % affordable housing requirement should be "wheelchair liveable", which means a prescribed series of building design changes to make it easier for an elderly and/or disabled householder to use and move around the accommodation. It is acknowledged that the costs of developing this kind of housing is higher. Therefore it is suggested that a more proactive approach is needed to ensure that public funding is increased and better matched to the need which is forecast.

At present there is no onus on private developers to provide "wheelchair liveable" housing. However, it is considered that developers of private housing could provide a broader range of open market accommodation that is flexible to evolving householder requirements. In particular, there is potential for more innovative higher density housing to provide suitable accommodation. This can also help achieve more liveable neighbourhoods which are more socially inclusive and where elderly people will feel less isolated. Achieving this will require the efforts of our community planning partners and housing providers.

Issue

Meeting the needs of an ageing population

Our preferred approaches

We believe that all of the following complementary measures are required.

- The Council, affordable housing providers, and other stakeholders should lobby the Scottish Government for increased funding to ensure that 25% of all new build, affordable housing units delivered across the Plan area are built to a "wheelchair liveable standard" - i.e. meet both the basic and desirable criteria as specified in the Housing for Varying Needs Guidance [37] .

- Private developers of large (50 or more dwellings) planning applications, will be required to provide 5% of the dwellings to be built to a "wheelchair liveable standard" - i.e. to meet both the basic and desirable criteria as specified in the Housing for Varying Needs guidance. This requirement is to be additional to the affordable housing provision required as part of the application. However, to ensure that sites remain viable, the 5% accommodation can be offered at its open market price/rental.

- The Plan could identify sites suitable for accommodation for the elderly and disabled, for example level sites in close proximity to services, facilities and public transport.

Alternative approach

Instead, we could do the following.

- Continue to accept a lower standard of wheelchair accessibility than that desirable, within the majority of new affordable housing.
- Rely on the development industry to deliver the required type and mix of homes in appropriate locations.

Feedback

Do you have any general feedback on this section? Please let us know.

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37   https://webarchive.nationalarchives.gov.uk/20131205120926uo_/http://www.archive2.official-documents.co.uk/document/deps/cs/HousingOutput/content/index.html

2 Spatial Strategy

Map 2.1 'Spatial strategy' is a visual summary of our preferred approaches to the 9 Main Issues that we have identified in this Report. It only includes those approaches which have a spatial or geographic dimension.

Map 2.1 Spatial strategy
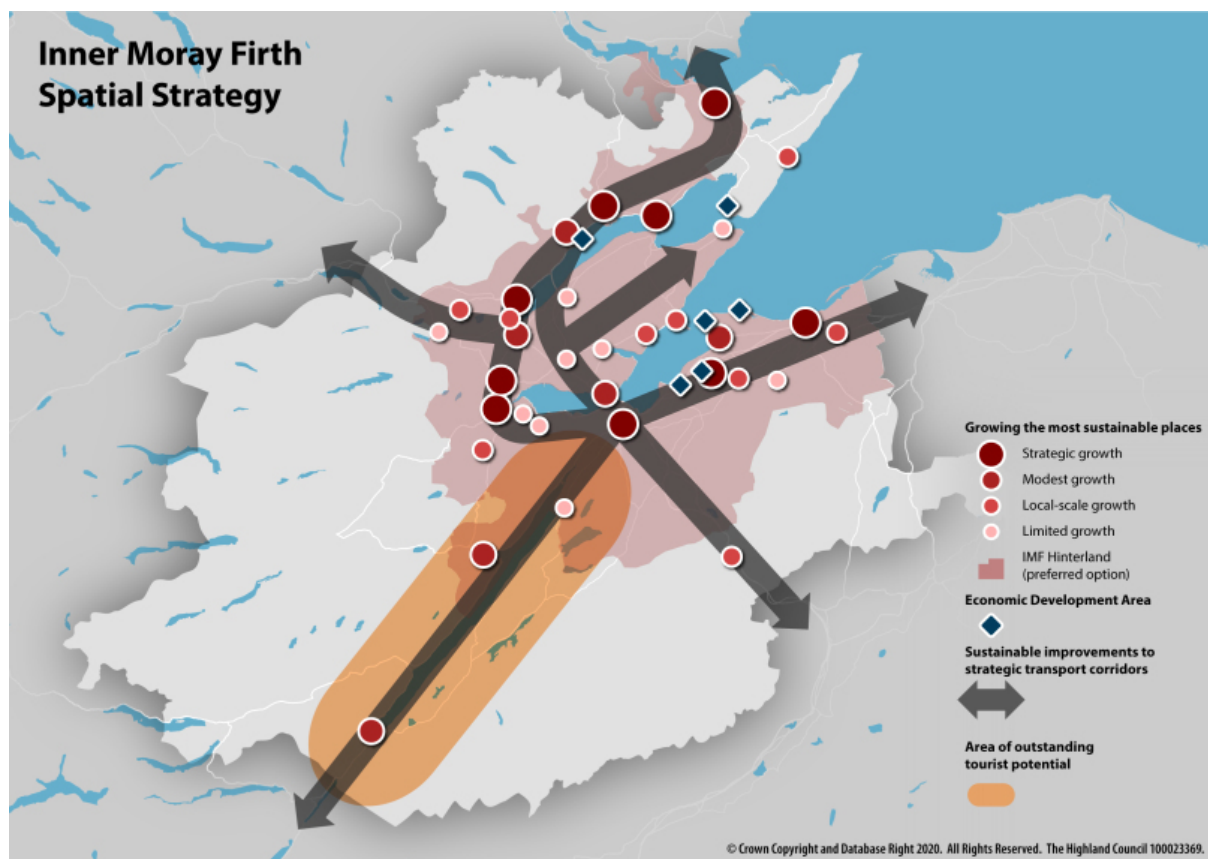
One significant change from our current policy approach is a suggested shift away from specifically identified growth corridors for land between Inverness and Nairn, and Easter Ross. Instead, we are proposing a finer grained strategy based on the Plan's settlement hierarchy. This hierarchy is based upon optimising environmental sustainability and economic viability in growth location selection. The suggested hierarchy is tabulated and justified, and the expected scale of growth envisaged within each tier of settlement is explained in 1.2.3 'Growing the most sustainable places'. We believe this approach will most successfully address the Plan's twin primary aims of addressing is issues raised in 1.2.1 'Addressing the Climate and Ecological Emergency' and 1.2.2 'Supporting a strong, diverse and sustainable economy'..

Outwith the main, identified settlements, our Spatial Strategy is to encourage economic development at specifically identified Economic Development Areas, which have a locational imperative to be there such as the established ports at Whiteness and Nigg. Similarly, the Loch Ness corridor is an established tourism destination where the benefits of tourists' spend and

disbenefits of tourists' environmental impact can better be managed to increase and spread economic benefit but also to encourage more sustainable tourism particularly in terms of tourists' mode of travel.

The Spatial Strategy graphic depicts the Plan's suggested:

- Settlement Hierarchy;
- Loch Ness Sustainable Tourism Corridor;
- Economic Development Areas;
- Hinterland Boundary; and,
- Spatial Priorities highlighted within the Council's draft Regional Spatial Strategy.

Housing in the Countryside - The Hinterland Boundary

Outwith the main, identified settlements, our Spatial Strategy for housing is better to manage pressure for new building because of its adverse environmental and economic effects. Specifically, uncontrolled, sporadic housing development in the open countryside closest to the major employment settlements, other things being equal:

- increases car-based trips to work and most other activities resulting in higher carbon and other harmful emissions than otherwise need occur;
- suburbanises the open (or dispersed pattern of settlement) landscape character of the existing countryside; and,
- increases the cost of public (and private) service provision such as a wired internet connection, a postal service, a private parcel delivery, a water main connection, waste collection, a public sewer connection, a mobile library van service, a school transport service.

Therefore, we believe that new development in the open countryside should be controlled to favour those with good reason to be there. Housing in connection with a business already in a countryside area or a new enterprise particularly suited to a rural area are existing, sensible exceptions. This includes farmers, crofters and others with a genuine, frequent need to manage their rural land use activity but also managers of kennels, catteries and other "bad neighbour" uses that are not suited to a traditional industrial estate.

Map 2.2 Hinterland
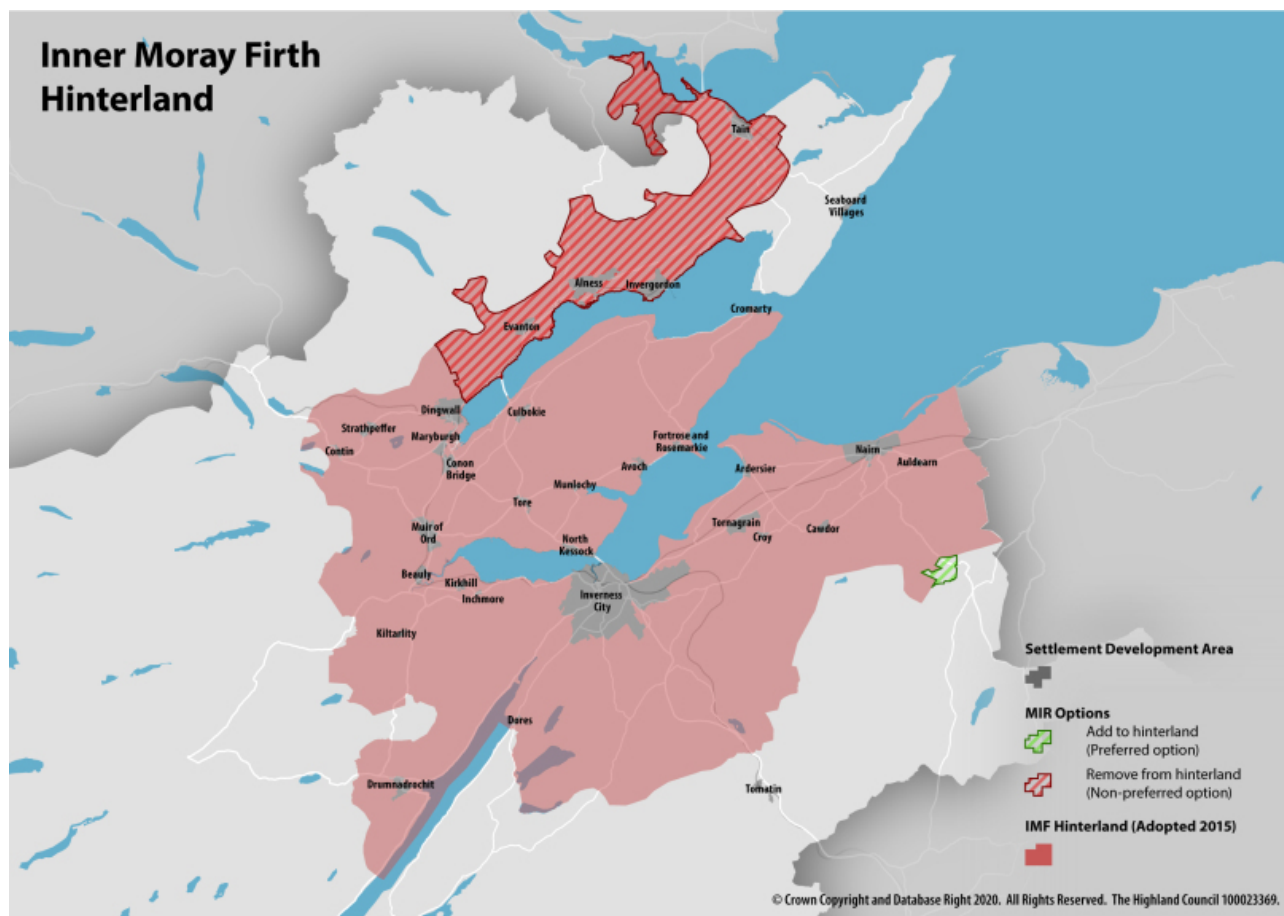
To allow some flexibility given that Highland has a long tradition of dispersed parish based settlement and that many indigenous people have been born and raised in rural areas, the Plan identifies a list of Growing Settlements where proportionate growth can occur without a land or business management justification. Similarly, there is no management justification required within existing housing groups.

This Plan cannot change the planning policy that applies within the Hinterland only the boundary that determines where that policy is applied. Presently, we are reviewing the detail of the policy itself including ways of increasing flexibility such as widening the definition of a housing group. This review is subject to a public consultation process separate from this Plan.

Issue

Hinterland Boundary

Preferred approach

Following an analysis of recent house completion data, demographic trends, and likely changes in future travel to work patterns combined with this Plan's aim of reducing unnecessary car borne travel, we believe that the geographic area of open countryside currently identified as the Hinterland is still fit for purpose. We are suggesting only one minor expansion to the Hinterland boundary at Belivat, Nairnshire, where sporadic development has occurred causing cumulative adverse environmental and servicing effects.

Alternative approaches

Recent house completion data (insert link) suggests that other expansions to the Hinterland boundary may be appropriate. There has been sporadic development outwith Tomatin and the dualling of the rest of the A9 and a new, safer village junction may increase that pressure. Similarly, the relatively high proportion of total house completions that have occurred outwith settlements in Nairnshire, East Ross and the small West Ross portion of the Plan may justify expansions to the boundary.

Conversely, some Highland Councillors have suggested on behalf of some of their constituents that the Hinterland boundary be significantly contracted in order to actively promote housing development in the countryside. The justification for such an approach is varied. Such development does support the small scale local construction industry, can support self build housing, can provide affordable house plots where related family land is available, and dispersed single house development tends to prompt fewer objections than larger scale proposals concentrated within settlements because of the latter's perceived or actual adverse impact on the residential amenity of immediate neighbours. The suggested contraction is to draw in the Hinterland boundary to the Cromarty Firth Bridge to exclude East Ross. This suggested contraction is not preferred because of the cumulative adverse impacts it would have on the climate, the cost and efficiency of public service provision, and on the local landscape. On a more technical point, the Hinterland was originally born out of a desire to protect the open countryside within a 20 minute drive time around major work centres including Invergordon and Alness so the removal of East Ross would undermine the very principle of this approach and leave a detached portion of the Hinterland area around Dornoch, which is outwith this Plan area.

2 Spatial Strategy

Feedback

Do you have any general feedback on this section? Please let us know.

For each settlement we have outlined the Key Issues and Placemaking Priorities that we think are important for guiding what development can happen in these places. For the main settlements, we have also identified specific development sites and given an initial indication of what we think of them. These development sites have come from 3 sources:

1. land[38] suggested by landowners, developers and communities through the Plan's initial "Call for Sites[39][40]";

2. undeveloped or only partly developed sites allocated within the existing aIMFLDP (insert link); and,

3. larger[38] sites with an extant planning permission that haven't already been included from source 1 or 2 above.

Each development site option has been given an initial, colour coded, Council preference of "preferred" (green), "alternative" (amber) or "non-preferred" (red). This preference is based on a sustainability appraisal (insert link) consideration of each site/proposal which includes input from a variety of stakeholders including public service providers. Please note that the Council's intention is to confirm for allocation in the next Proposed Plan, only those sites shown as "preferred" in this document. An "alternative" site will only be considered for confirmation where it can be evidenced, in response to this Main Issues Report, that it is clearly better in sustainability appraisal terms than at least one equivalent "preferred" site in that locality. The following explains our approach to site preferences.

Preferred Sites

- Sites that are the most suitable in sustainability appraisal (insert link) terms, i.e. they are the most environmentally sustainable and most economically viable to develop for both the public and private sector especially in terms of infrastructure provision and other mitigation necessary to deliver them.

- Larger (10 or more dwelling units and non housing equivalent) fully committed sites that are under construction as of summer 2020.

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38   We have not included some sites because we think they are of too small a scale to be significant to the future of a main settlement (as defined in this document) or they are proposals and/or in locations that are clearly, in our view, environmentally unsustainable.

39   https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/202/

40   inner_moray_firth_local_development_plan/3

Alternative Sites

Sites that are reasonable in sustainability appraisal terms (insert link) but are not required in quantitative terms - i.e. if they were included then the capacity of housing component development sites confirmed in the Plan would be well in excess of the Plan's Housing Supply Target or would represent over-provision within the non housing land supply, e.g. would be likely to displace economic activity from one Plan area location to another rather than increase overall economic activity.

Non-Preferred Sites

Sites that are the least suitable in sustainability appraisal (insert link) terms, i.e. they are the least environmentally sustainable and/or the least economically viable to develop for both the public and private sector especially in terms of infrastructure provision and other mitigation necessary to deliver them.

3 Main Settlements

3.3 Auldearn | Allt Èireann

Main Settlement 3

Auldearn

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[Click here](#) to view full screen.

</div>

The small village of Auldearn is located about 2 miles to the east of Nairn and lies on undulating land which influences the form and setting of the settlement. Facilities and services are limited to a small shop/post office, a hotel/pub and a primary school. Since the turn of the millennium, there has been a steady delivery of nearly 100 new homes which equates to an average of 5 per year.

The 175 pupil capacity primary school is located in the centre of the village and serves not just Auldearn but a large rural catchment. The School Roll Forecast shows a 2 classroom extension will be required to accommodate the steady increase in pupils projected to attend over the next ten years.

The village lies in and around the site of the 1645 Battle of Auldearn and this has been a defining factor in the extent to which the settlement has developed over recent times.

The A96 dualling project includes a bypass of Nairn which incorporates a high capacity grade separation junction to the north of Auldearn. This may help support further small scale allocations to be delivered over the long term.

Placemaking Priorities

- Consolidate Auldearn with any new development helping to round off rather than expand in any one direction.
- Ensure a coordinated approach to development with contributions towards the active travel network and areas of open space.
- Avoid any further uncoordinated ribbon development along Moyness Road.
- Safeguard the 1645 Battle of Auldearn battlefield from development.

Map 3.3 Auldearn

A96(T)

AU05

AU04

AU02

AU01

Meadowfield

AU03

FORRES ROAD

Montrose's Hollow

Sch

PW

HIGH STREET

Hall

LETHEN ROAD

AU06

B9101

Dead Wood

1 cm = 55 m

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3 Main Settlements

Sites

Alternative Sites

AU01

Name: Meadowfield   **Use(s):** Housing

AU02

Name: Meadowfield Steadings   **Use(s):** Housing

AU03

Name: East of Montrose Avenue   **Use(s):** Housing

The land east of Montrose Avenue offers possibly the best site option and most logical expansion of Auldearn. However, to ensure it is well connected to the rest of the village we want the applicant to demonstrate that suitable access and connections can be delivered. We would expect that this should avoid a convoluted access from Moyness Road.

Whilst there may be capacity for further housing development on the northern side of Moyness Road, the applicant has not addressed issues raised in the past relating to surface water drainage, upgrading of transport infrastructure and appropriate site layout. A masterplanned approach will be needed to address these issues and create a coordinated approach.

Non-Preferred Sites

AU04

Name: Meadowfield North   **Use(s):** Housing

AU05

Name: South of A96   **Use(s):** Housing

AU06

Name: Lethen Road   **Use(s):** Housing

The sites north of Meadowfield are non preferred as much of it is prime agricultural land, could have impacts on the setting of Auldearn and require significant transport infrastructure. Land at Lethen Road is non preferred as it is wholly within the Battle of Auldearn battlefield. The site would also require a major transport network upgrade which is likely to make it unviable.

3.6 Cawdor | Caladair

> **Main Settlement 6**
>
> **Cawdor**
>
> [Click here](#) to view full screen.

Cawdor is located approximately 8km south-west of Nairn on the B9090. The village is closely associated with Cawdor Castle and the majority of the estate buildings date back to the 18th century and lie within a Conservation Area.

The strategic expansion of Cawdor was first identified, along with other small settlements such as Croy, in the A96 Corridor Masterplan in 2006. This was part of a wider aspiration to encourage large scale mixed use growth along the A96. The levels of growth anticipated in the Masterplan have not been realised and development which has been delivered is located in the larger settlements.

Cawdor is not seen as a suitable place for strategic growth given its limited facilities and public transport accessibility and corresponding need for new infrastructure. This means that new residents will be almost entirely reliant on car-based transport. In addition, since Cawdor was first earmarked for development the spare capacity in the school which was identified in HwLDP, has also been taken up.

As there is potential within the village core for some small scale infill and rounding off development, we intend to reclassify Cawdor as a Growing Settlement within the next Proposed Plan. We will take forward the Placemaking Priorities below, into the Proposed Plan to help determine planning applications and investment decisions. Particular attention must be paid to the design and layout of new development in order to integrate it with the existing high quality historic environment.

Placemaking Priorities

- Support small-scale infill and rounding off the village
- High quality of architectural design and layout in order to complement the surrounding historic environment.
- Avoid areas which are at risk of flooding from the Cawdor Burn
- Safeguard from development and enhance wherever possible the mature woodland
- Seek developer contributions and other funding towards the provision of the A96 Landward Trail.

Picture 3.1 Cawdor
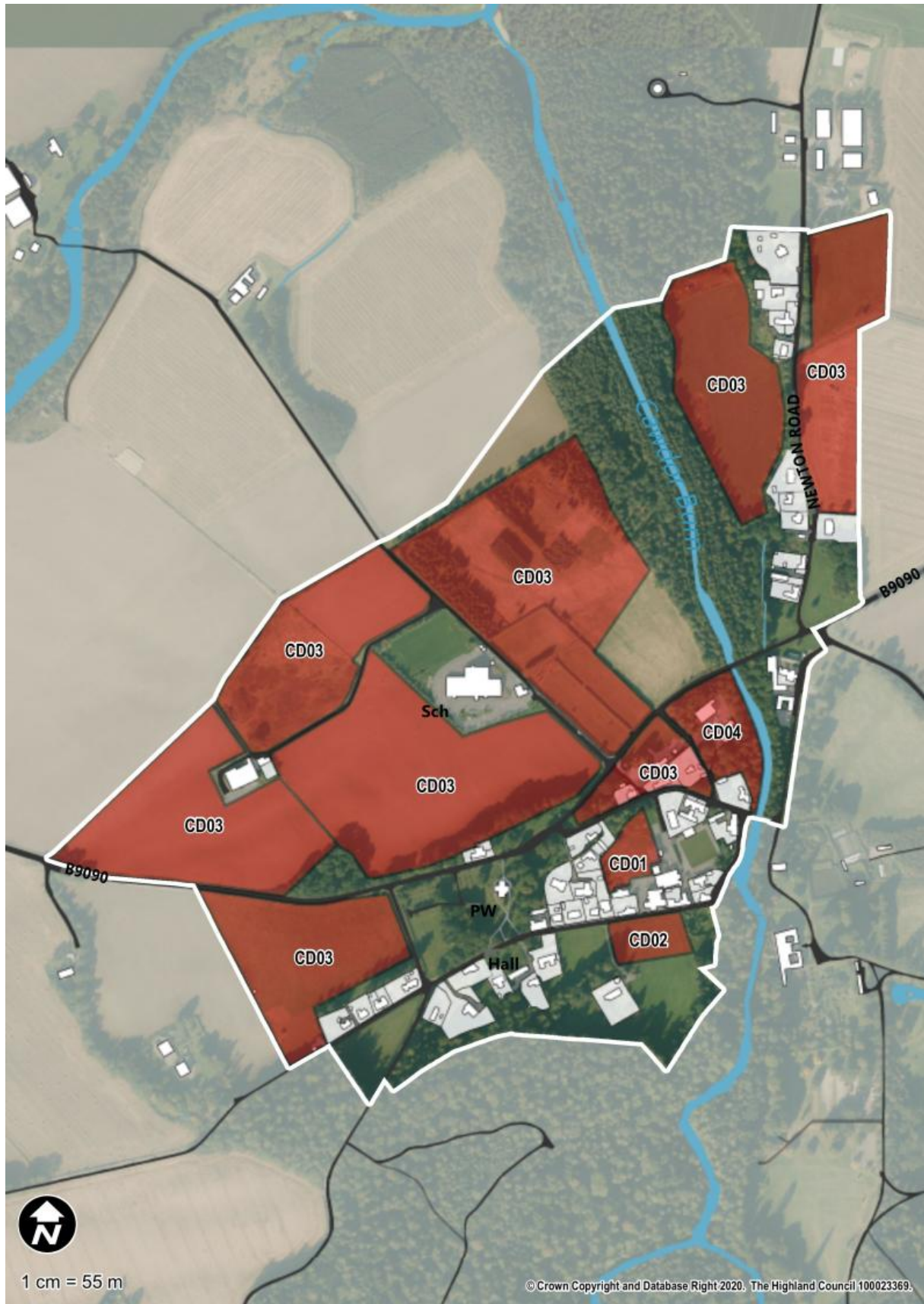
Sites

Non-Preferred Sites

CD01

Name: Old School Playground   **Use(s):** Housing

CD02

Name: Opposite Old School   **Use(s):** Housing

CD03

Name: Cawdor expansion   **Use(s):** Mixed Use (Housing, Retail, Business, Community)

CD04

Name: Old Smithy   **Use(s):** Mixed Use (Housing, Business)

We are not preferring any of the existing allocations in Cawdor as is not considered as a sustainable and viable place for strategic growth. This is due to its limited facilities, poor public transport options, and lack of spare primary school capacity. We think that Cawdor is better suited as a Growing Settlement which will allow for suitable small scale, infill and rounding off opportunities only.

3 Main Settlements

3.26 Nairn | Inbhir Narann

<div style="border">

Main Settlement 25

Nairn

[Click here](#) to view full screen.

</div>

Nairn is the third largest settlement in Highland and provides a wide range of economic and social functions for the wider Nairnshire county. Given its attractive coastal location and setting the town is also a well established tourism and leisure hub. It has seen a slight increase in population since 2011 with the number of residents now standing at just over 10,000.

The aIMFLDP identifies Nairn as an important settlement within the A96 Growth Corridor with nearly 1,000 new homes delivered since the year 2000. Most of these new homes have been built at Lochloy on the eastern side of the town and progress is currently being made to deliver an active travel bridge over the railway line and enhance connections through Balmakeith Industrial Estate. The large housing and mixed use sites allocated to the west and south of Nairn have not been progressed.

There is support and pressure for the Scottish Government's A96 dualling programme which includes the Auldearn/Nairn to Inverness section as the first stage to progress as soon as possible. Nairn will experience major change as a result of the Scottish Government's commitment to dual track the A96 by 2030 which includes a bypass of the town. The delivery of a bypass of the town and the related de-trunking of the existing A96 through the town centre will ease long standing congestion problems and will support the aspirations for related improvements to the public realm and built environment. This includes: making King Street more pedestrian friendly, introducing more greenery and new mixed use development fronting streets. These are set out in more detail in the [Nairn Community Town Centre Plan](#)- which is non-statutory supplementary guidance.

Furthermore, the community have been ambitious and proactive in setting out an updated vision for the future of Nairn with a regeneration plan to accompany a bid for regeneration capital grant funding. This takes account of previous masterplans for the area and attempts to provide a plan for economic recovery from the COVID-19 pandemic. The emerging ambitions are focused around strengthening Nairn's strategic role as an economic and cultural hub, town centre and harbour regeneration, infrastructure delivery and the enhancement of greenspaces. Alongside this plan,

physical works are starting as part of funding secured through the Team Hamish campaign. Planning permission was also recently granted for a mixed use town centre scheme which overlooks King Street and helps to take forward the aims of the Town Centre Plan.

Continued investment in certain pieces of infrastructure will be needed to support the area to prosper. Whilst there are no current capacity issues in either the primary or secondary schools, the condition of the schools is poor. Nairn also has combined sewer overflow issues which has led to pollution to the Nairn bathing beaches in the past. Following major investment in the network over recent years it has helped both beaches achieve upgrading of the water quality rating from 'poor' to 'sufficient'.

Given its good transport links and its role within the wider County, we think that Nairn should maintain its place in the top tier of the settlement hierarchy and be the focus of the area's growth. The town centre continues to be the first preference for development and a number of key sites provide particular opportunities. Alongside of this we believe there is opportunity to use Nairn Common Good land to deliver the next phase of development and which is integrated with the town and in line with the [Development Brief] which we intend to carry forward as part of the plan review. Across the wider settlement there remain to be challenges for the delivery of other growth directions including infrastructure constraints and the compatibility with existing land uses. The Council is keen to work with the local community and wider stakeholders to address barriers to development and help realise community aspirations.
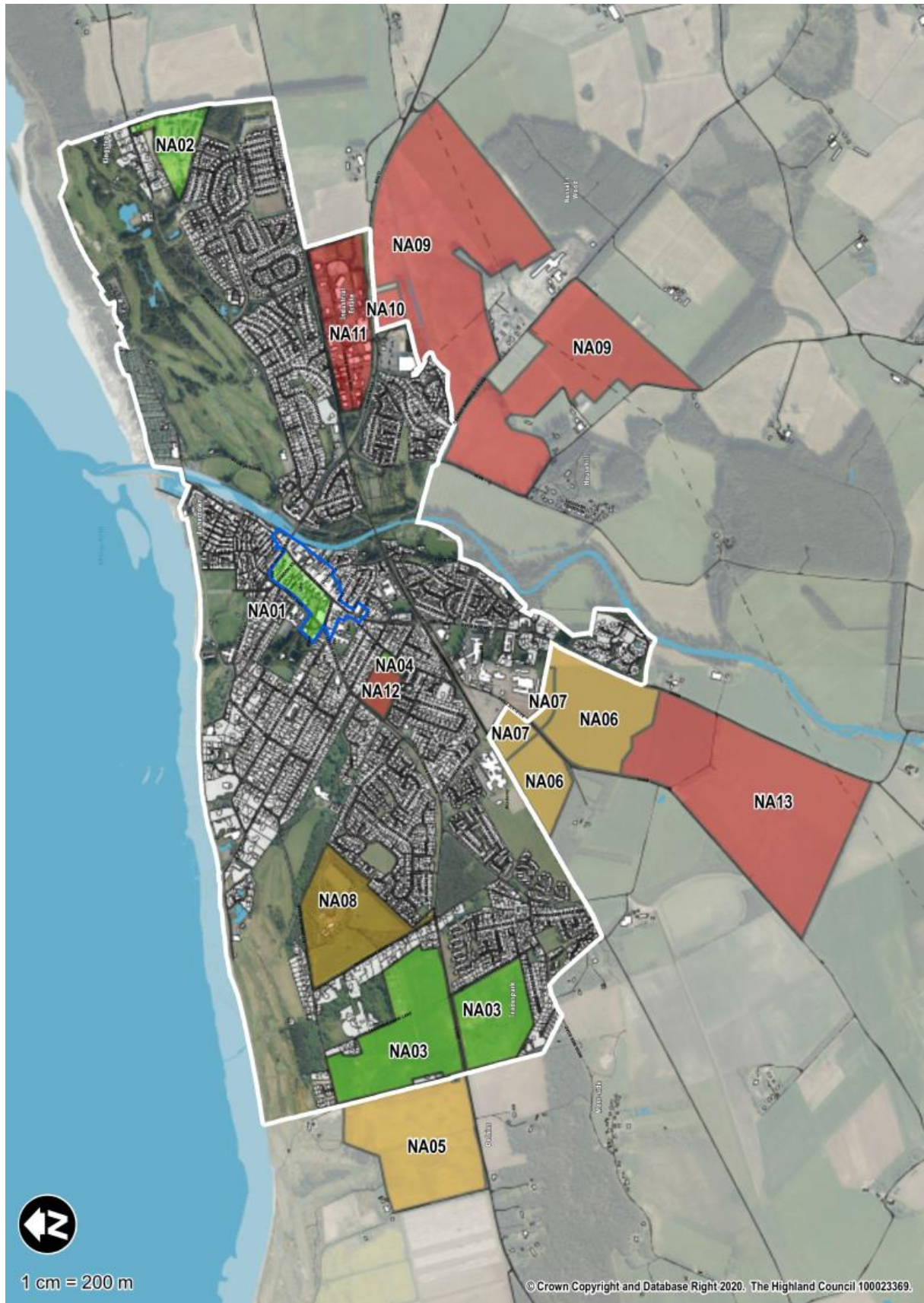
Placemaking Priorities

- Strengthen Nairn's role as the strategic market, service and social centre of Nairnshire.
- Consolidate the expansion of Nairn with growth focused on areas which are well connected to the town and facilities and can deliver improved active travel links.
- Implement the Town Centre Action Plan to make it more accessible, attractive, and promote regeneration and tourism opportunities.
- Further regenerate and enhance the harbour as a leisure and tourist destination and create better connections with the town centre.
- Maximise the potential benefits from the A96 bypass by creating a more attractive environment and improved active travel links.
- Seek developer contributions and other funding towards the provision of the A96 Coastal and Landward Trails.
- Concerted effort to maintain, and improve wherever possible, the water quality of the beaches in Nairn.

Map 3.29 Nairn

1 cm = 200 m

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Sites

Preferred Sites

NA01

Name: Nairn Town Centre | **Use(s):** Mixed Use (Housing, Business, Retail, Community)

NA02

Name: Kingsteps | **Use(s):** Housing

NA03

Name: Sandown | **Use(s):** Mixed Use (Housing, Business, Community)

NA04

Name: Former Showfield East | **Use(s):** Housing

A number of development opportunities remain within the town centre (site NA01) and the Nairn Town Centre Action Plan provides a guide for delivering regeneration and creating a more accessible and attractive environment.

Kingsteps has planning permission for 117 new homes and is currently nearing completion. Land at Sandown is considered to offer the best option for the strategic growth of Nairn as there is an adopted Development Brief which sets out a well considered layout, integrating development with areas of open space and the existing urban fabric. It also provides a logical expansion area, is located on relatively flat land and with improved active travel infrastructure can provide convenient connections to the centre and main facilities.

The land at Showfield East is considered to be suitable for a relatively small amount of development providing that it complements and is compatible with the existing area of green space. It can also be used to help create improved access and parking for the public.

Alternative Sites

NA05

Name: Delnies   **Use(s):** Mixed Use (Housing, Community)

NA06

Name: Nairn South   **Use(s):** Mixed Use (Housing, Business, Community)

NA07

Name: Sawmill expansion   **Use(s):** Industry

NA08

Name: Achareidh   **Use(s):** Housing

Nairn South is positioned close to many key facilities, including the hospital and train station and there remains developer interest in taking forward a mix of uses in this area. However, a number of transport related issues have yet to be resolved. Recent planning decisions have also highlighted concerns about compatibility with surrounding land uses. Further information is required to demonstrate that viable solutions to these constraints can be delivered. As it stands there are other sites across the town which are more deliverable.

Whilst Sandown is identified as Preferred above, Delnies is more detached from the existing settlement edge and would have a visual impact on the west of Nairn, particularly if it came forward in advance of Sandown. Its location means it would also not be as attractive for active travel to key facilities than other sites. Although there is developer interest in taking the site forward - which has led to the site being identified as Alternative - for the reasons above this would not be considered an ideal location for future growth.

There may be development potential within Achareidh but unresolved access constraints and a lack of developer interest leads to it not being supported. If the landowner can better demonstrate that the site is viable, constraints can be overcome and can provide more detail on the siting of development, there may be scope for its inclusion in the Plan.

Non-Preferred Sites

NA09

Name: Granny Barbour Road

Use(s): Mixed Use (Housing, Business, Retail, Community)

NA10

Name: East of the Retail Park

Use(s): Mixed Use (Housing, Retail)

NA11

Name: Balmakeith

Use(s): Business

NA12

Name: Former Showfield West

Use(s): Housing

NA13

Name: Nairn South Extension

Use(s): Housing

Whilst the large site put forward at Granny Barbour Road compares reasonably well against other large site options in terms of viability, there are certain factors which result in it being Non-Preferred. These include the scale of development proposed exceeds what is required, it requires a relatively high level of new infrastructure and the areas at risk of flooding push development to the outer reaches of the site furthest removed from the existing settlement.

Land to the east of the retail park is non preferred as further retail uses could have an adverse impact on the town centre. Whilst housing development could help to provide a more attractive entrance into the town, it is distant from the town centre and key facilities.

Balmakeith industrial estate is largely built out, with only a few vacant plots remaining and as such any development allocation is not considered to be required. Building the active travel bridge over the adjacent railway line to Lochloy is a key priority alongside enhancing connections to it through the industrial estate.

3 Main Settlements

The proposal to extend Nairn South beyond the current allocation is not being supported as there are still unresolved issues relating to the existing allocation. The extension would lead to greater impacts on the landscape and be less sustainable than alternative site options.

The aIMFLDP contains an "Other Settlements" policy which, within a defined list of places, supports a lesser scale of development than within the "Main Settlements" but a more positive approach than within the countryside. Settlements currently included are places which have/had at least one community facility (e.g. a school or public hall). We intend to bring our policy approach to these smallest settlements in line with our other local development plans for Highland. We wish to call them "Growing Settlements" and not use the existence of a facility as the sole reason for including or excluding places from the list. Instead, we will only include places that have some development pressure, few environmental constraints to development, and facility/service networks that can accommodate additional building. These are listed as Tier 5 settlements in Settlement Hierarchy. For each potential "Growing Settlement" this Main Issues Report sets out draft key issues and placemaking priorities for comment. An annotated aerial photograph is included for each settlement but please note that this is for illustrative purposes only and that the photograph's geographic extent is of no policy significance. Once finalised, these will be applied in determining planning applications in these places.

4 Growing Settlements

Growing Settlements

In this StoryMap, click the index tab in the top right to view more Growing Settlements or scroll through them using the arrow buttons at the bottom. To view the issues and placemaking priorities for each site, click on the information button in the top right.

Click here to view full screen.

The Main Settlements detail employment land allocations within the Plan area's main towns and villages but there are several other strategic sites which can generate significant job opportunities outwith these settlements that we think should be identified. We call these Economic Development Areas (EDAs) and they are listed and mapped below. A set of guiding principles is included for each EDA identified in the Plan. These will be used to guide future development and assist in determining the extent and location of suitable opportunities.

We have chosen not to roll forward previously allocated economic development sites (known as Strategic Employment Sites in the aIMFLDP) at Fendom and Fearn Aerodrome. This is mainly due to concerns over their deliverability as we are not aware of any significant commercial interest or potential future development pressures.

Two bids were made at Call for Sites stage for tourism and leisure related developments at land near Nigg Yard and Kildary. Instead of allocating these sites, a more general reference has been made in the Growing Sustainable Tourism sector to the wider opportunities which exist in Easter Ross to bolster the tourism industry. If full planning permission is granted then we may consider allocating them in the future.

Economic Development Areas

In this StoryMap, click the index icon in the top left to view all of the Economic Development Areas or scroll through them using the arrow buttons at the bottom. To view the issues and placemaking priorities for each site, click on the information button in the top right.

Click here to view full screen.

Appendix 3: Placemaking Audit

The Highland Council Placemaking Audit

Table 9

Design Quality		Ambition	Requirement
	D1	The development, when completed is designed to create a distinctive high quality '*sense of place*', which respects and enhances the existing site, locale and landscape features and avoids heavily engineered proposals.	Essential
	D2	The development protects important and distinctive buildings and natural heritage assets within or in proximity to the site. It maintains views of existing landmarks and landscapes and follows the principles in '<u>Creating Places</u>'.	Essential
	D3	Developments at the edge of settlements provide a positive distinction between the urban and rural environments and create a '*sense of arrival*' into the urban area.	Essential
Distinctive	**D4**	Within or close to built heritage designations, the built form, material finish and palette of buildings and hard landscaping protects and enhances the traditional local character and design.	Essential
	D5	Development makes use of innovative designs, 'Passive House' design criteria, off-site construction techniques and/or modern methods of construction.	Desirable
	D6	External material selection is appropriate for the highland climate and is chosen to respect and enhance its wider setting,	Essential
	D7	Potential for personalisation of individual properties by prospective owners.	Desirable
	D8	Within Inverness City, major or locally significant developments have been presented to the <u>Inverness Design Review Panel</u> and the outcomes respected.	Desirable
	D9	Ground floor commercial unit's shopfronts to conform to the Council <u>Shopfront Design Guide</u>.	Essential
	S1	*Active frontages*, including '*corner turner*' style houses, overlook well-lit streets, footpaths and open/green spaces, resulting in natural surveillance using outwards facing *perimeter blocks* along key routes.	Essential
Safe & Pleasant	**S2**	In-curtilage garages and parking areas located to the side or rear of properties to avoid car dominance of the streetscape.	Essential
	S3	Provision of appropriately designed residents and visitor cycle parking in a sheltered, secured and overlooked position, in conformity with the Council's <u>Roads and Transportation Guidelines.</u> In urban flatted developments, individual in-unit cycle storage is encouraged.	Essential

S4	Provision of open public spaces in accordance with relevant Local Development Plan (LDP) policy to be fit for purpose, usable, flexible (including utility hook-ups to civic spaces) and cost effective to maintain. Delivered in compliance with PAN 65: Planning and Open Space.	Essential
S5	Well located and sufficient play opportunities provided, in areas which benefit from natural surveillance and are integrated into the overall scheme. Play equipment to be inclusive and serves a range of ages (incl. adults).	Essential
S6	Play areas achieve a minimum 'Bronze' *PiPA* (Play Inclusive Play Areas) accreditation.	Desirable
S7	External lighting sited and designed to avoid light pollution and use energy efficient LED fittings. New Street lighting to be in the form of dimming LED columns/fittings.	Essential
S8	*Secured by Design:* Homes (2019) and/or Commercial Developments (2015) respected and awarded to a minimum Bronze standard.	Desirable
S9	Scheme designed to comply with the BRE '*Home Quality Mark*' scheme.	Desirable
S10	An accessible Automated External Defibrillator (AED) is provided.	Desirable
S11	The development accords with a Local Place Plan.	Desirable
W1 **Welcoming**	Developments require to be designed to assist residents and visitors orientate and move around the site without becoming disorientated. This can be achieved by: · providing or accentuating landmarks to create or improve views; · locating public art to identify places. Public art provided in accordance with relevant LDP policy/Supplementary Guidance; · use of '*Sequence Markers*' · careful siting of signature buildings or utilising contrasting massing; · providing high quality signage and / or distinctive lighting to illuminate attractive/important buildings; · proportionate provision of high-quality street furniture and signage.	Essential
A1 **Adaptable**	The layout should include a mixture of uses, building densities, housing types and tenures. Affordable housing provision to be provided in accordance with LDP policies.	Essential

Appendix 3: Placemaking Audit

Within the urban cores flatted developments could include vertical mixed-use blocks.

A2   Affordable house design conforms to the Council's 'Firm Foundations Design Brief: Building Homes for the Highlands' & Scottish Government's 'Housing for Varying Needs Design Standards' — Essential

A3   Infrastructure provided for 'Fibre to the Premise' (FTP) installation. — Desirable

A4   In housing developments, *self-build house plots* are provided in accordance with LDP policy. — Essential

A5   Utility infrastructure hardware (e.g. substations, telecommunication cabinets and pumping stations) are appropriately designed, sited and screened from public view. — Essential

A6   Infrastructure (cable routes) provided for 'in-curtilage' Electric Vehicle (EV) charge-point installation. — Essential

R1   The development is of a suitable density to avoid excessive land-use and does not detrimentally affect neighbouring established uses. — Essential

R2   Existing mature landscaping within and adjacent to the site is retained, protected and enhanced to create new *wildlife corridors*. — Essential

R3   Within residential developments, an area for *allotments, community gardens, community woodlands* or a community orchard or community food growing space is provided in a location which encourages public harvest. — Essential

R4   Built developments located out-with the relevant SEPA flood extents and shown to avoid flood risk. — Essential

R5   Decorative well integrated *SUDS* scheme which includes a degree of natural surveillance and designed to conform to the current edition of Sewers for Scotland or the CIRIA SUDS Manual The long term inspection and maintenance regime and organisation responsible identified at the outset. — Essential

Resource Efficient

R6   Watercourses and wetlands areas retained, improved and incorporated into the scheme. Including adoption of the Council Riparian policy. — Essential

R7   Incorporates the use of water conservation principles; including individual properties rainwater collection and reuse systems. — Desirable

R8   Appropriately designed and sited in-curtilage storage space for refuse & recycling and the provision/locations for on-street collection points identified. — Essential

R9   For residential developments over 100 units, appropriately designed and sited communal glass recycling facilities and community composting areas provided. — Essential

R10   The layout should be designed to: — Essential

· maximise benefits from *solar gains* and internal daylighting to individual properties

·   minimise *wind-channelling* between units and protect buildings from the prevailing weather;

·   have properties with '*living roof*' and/or '*living wall*' systems;

·   avoid the use of dead-end '*cul-de-sacs*' and limited use of private access roads;

·   ensure rear garden access to mid-terraced properties is achieved;

·   deliver the higher density units closest to community facilities and public transport nodes.

R11	The development makes use of *micro-renewable* technology and / or enhanced energy efficiency/recovery systems (improvement on the levels sought in the Building Standards).	Desirable
R12	Bio-diversity aspects are mitigated, protected and restored as part of the development, including:	Essential

·   An initial *Wildlife Assessment Check* is undertaken and submitted as part of the proposal.

·   Following the above assessment, formal appropriate wildlife & species assessments are prepared, and outcomes respected and incorporated into the scheme.

·   The inclusion of nesting boxes and habitat creation (bird, bat and insect boxes) are provided across the scheme.

·   Invasive non-native species identified and removed.

·   Wildflower meadows and/or *mini-forests* established on site.

R13	Construction material sourced from environmentally managed supplies and construction waste is minimised and recycled where possible.	Desirable
R14	The development applies the RIBA Sustainable Outcomes Guide (2019) to the design of both buildings and places.	Desirable
Easy to Move Around & beyond	**E1**	Developments to be well connected to bus and rail nodes in accordance with PAN 75: Planning for Transport. New or extended bus routes to be served by well located, high quality bus shelters which are well lit and provide sheltered seating and real time bus information.	Essential

E2 A clear road and street hierarchy is designed to conform with 'Designing Streets' and the Council's Roads and Transportations Guidelines for New Developments and should include:

Essential

· Road *design speed* appropriate to the form and nature of the street design and development layout;

· Road junction designed to prioritise *active travel*;

· Consideration given to future road connections for adjacent/later schemes;

· Underground utilities located within service strips/road verges;

· Varying road designs, widths and surfacing to differentiate the hierarchy.

E3 The layout includes 'Homezones', '*Town Squares*' and/or '*Play Streets*' to encourage greater mode share of the street network.

Desirable

E4 The location and distances to existing facilities (e.g. education, retail and community uses) are assessed against PAN 75: Planning for Transport and the requirement for expanded or new facilities should be addressed.

Essential

E5 A network of *fully accessible* compliant interconnected, permeable, well-lit, intuitive and overlooked *active travel* routes which follow desire lines and are suitably graded are created. These should link to or extend existing *active travel* networks, *National Cycle Networks*, '*Safer Route to School*' networks and/or *Core Paths* where they exist and allow for future extensions into adjacent lands.

Essential

E6 Communal parking, *parking barns* and visitor parking areas designed to:

Essential

· Conform to the Council's Roads and Transportations Guidelines for New Developments**;**

· ensure they are overlooked and well lit;

· avoid dominance of the streetscape;

· ensure parking bays are broken up into groups of no more than five bays and interspersed with soft landscaping/*street trees;*

· provide Electric Vehicle (EV) charging locations;

· provide 'Car Club' spaces;

· comply with the *Safer Parking 'Park Mark'* Scheme.

The Highland Council Placemaking Audit Glossary

Table 10

Active Frontage	A street where there is an active visual engagement between those in the street and those on the ground and upper floors of buildings.
Active Travel	Journeys undertaken by physically active means, like walking, wheeling or cycling.
Allotment	A small piece of ground, in or just outside an urban area that a person rents for growing vegetables, fruits, or flowers.
BRE Home Quality Mark	An assessment tool to demonstrate high quality homes and to differentiate them in the marketplace. At the same time, it gives householders the confidence that the new home are well designed and built, and cost effective to run.
Community Garden	A single piece of land, gardened collectively by a group of people.
Community Woodland	Woodland where the local community has control over how the woodland is run or managed.
Corner Turner	A building located on a corner (e.g. at a road junction), designed to provide an _active frontage_ to both streets.
Core Path	Under the Land Reform (Scotland) Act 2003 and the Land Reform (Scotland) Act 2016, Councils have a duty to prepare a Core Paths Plan. The purpose is to identify a network of key routes for outdoor access; an Interactive Map of Highland Council Core Paths is available.
Cul-de-sac	A street with only one inlet/outlet, connected to the wider street network.
Design Speed	The design speed is a logical speed to travel a road with respect to the topography, anticipated operating speed, the adjacent land use, and the functional classification of the highway.
Desire Lines	A route which represents the shortest or most easily navigated route between an origin and destination.
Fully Accessible	All routes designed to conform to the Equality Act to ensure routes are fit for purpose and open to all users.
Green Network	Local Development Plan designation of green areas within an urban area, which could be put to a multitude of uses (including play areas).
Greenspace	Formally recognised in the Local Development Plans. Contains no built development and is safeguarded. It will contribute to the character and setting of a place and provide amenity, biodiversity, recreation and other benefits.

Appendix 3: Placemaking Audit

Home Zone	Residential areas designed to ensure that the quality of life in the residential area takes precedence over ease of vehicle movement. They usually involve narrow shared surfaces roads with built-in elements (raised tables/chicanes) combined with features such as trees, planters and street furniture to limit traffic speeds.
Living Roof	A roof of a building that is partially or completely covered with vegetation and a growing medium.
Living Wall	Panels of plants, grown vertically using hydroponics, on structures that can be either free-standing or attached to walls.
National Cycle Networks	A UK-wide network of signed walking and cycling paths connecting cities, towns, and the countryside.
Micro-Renewables	Small scale systems that generate electricity and/or heat.
Mini-forests	Tiny, dense forests achieved by planting saplings close together, three per square metre, using native varieties adapted to local conditions. A wide variety of species, ideally 30 or more planted to recreate the layers of a natural forest.
Parking Barn	Communal open frontage covered parking area.
Perimeter Blocks	The public facing parts of buildings are orientated to face the street and the more private (garden) elements are located within the block.
Play Streets	Simple, effective and low-cost way for children to be able to play out in the streets where they live.
PiPA	PiPA (Play Inclusive Play Areas) provides a comprehensive six point assessment tool to help inform/improve new play space design to ensure all children benefit from the play provision. Bronze, Silver & Gold accreditations available.
Safer Parking 'Park Mark'	A national standard for UK car parks that have low crime and measures in place to ensure the safety of people and vehicles.
Safer Routes to School	Routes designed to decrease traffic and pollution and increase the health of children and the community, by promoting walking and biking to school.
Secured by Design	A Police initiative that improves the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit.
Self-build house plot	A house plot available for an individual or group of individuals to build house(s) to plans and specifications decided by them.
Sense of arrival	A special feeling a person experiences during the first ten seconds or so after entering a location.

Sense of place	The context as well as the identity or unique characteristics of a building or space that creates meaning for the occupant or user.
Sequence Markers	A physical/built item that helps a user to orientate themselves. Can be either a natural landmark or view or a man-made feature, including; differing house styles, street furniture, decorative feature or path design/finish.
Street Trees	A tree located on land forming or adjacent to a road which affects, in some way, those using that highway.
SUDS	Sustainable Urban Drainage Systems are water management practices that aim to align modern drainage systems with the natural water cycle.
Town Squares	An open public space located in the heart of an urban area used for community gatherings and events.
Wildlife Assessment Check	Free online tool available from 'Biodiversity in Planning' for small to medium-scale developers to check whether they will need expert ecological advice before submitting a planning application. The tool is not intended for large development projects where formal Environmental Impact Assessments (EIA) are required according to EIA regulations
Wildlife Corridor	Interlinked greenspaces to provide connections across sites for biodiversity.
Wind Channelling	A negative effect resulting from a ridged layout which channels wind between buildings.

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