| Agenda Item | 6 |
|----------------|-------------|
| Report No | ECI/41/2021 |

HIGHLAND COUNCIL

Committee: Economy and Infrastructure

Date: 2 December 2021

Report Title: Inner Moray Firth Proposed Local Development Plan 2

Report By: Executive Chief Officer Infrastructure, Environment & Economy

Purpose/Executive Summary

1.1 This report sets out for approval the key strategic elements of the second Inner Moray Firth Proposed Local Development Plan. The relevant content, which is outlined in **Appendix 1** takes account of responses received during a consultation on a Main Issues Report for the plan undertaken from January to April this year and feedback from the Council's six relevant Local/City committees. Members are asked to give approval to these elements of the plan to allow officers to create the Proposed Plan which will be published for public consultation in early 2022, with feedback from the consultation to be reported back to this Committee to help finalise the plan for adoption.

2 Recommendations

- 2.1 Members are asked to approve the Inner Moray Firth Proposed Local Development Plan for consultation, including:
 - i. Agree the officer recommendations on strategic issues outlined in **Appendix 1**, noting the issues raised by respondents and Local/City Committees;
 - ii. Note the place-specific changes agreed by the Local/City Committees as set out in **Appendix 2** as amended by paragraph 6.11 below;
 - iii. Agree the approach to consultation outlined in section 7 of this report;
 - iv. Note that the Proposed Plan for publication will include additional supporting documents and minor factual updates, with any material changes to be agreed with the chair of the relevant committee(s) prior to publication; and
 - v. Agree for the published Inner Moray Firth Proposed Local Development Plan to be treated as a material planning consideration, in line with government guidance.

3 Implications

1

3.1 **Resource** - resources to complete the statutory processes are allowed for within the Service budget.

- 3.2 Legal the Plan can be challenged in the courts but only on matters of process not planning judgment emphasising the need for the Council to continue to adhere to all statutory procedures throughout the Plan's progress so that the Council will have a defensible position in the event of any challenge.
- 3.3 **Community (Equality, Poverty and Rural)** An Equalities Impact Assessment (EqIA) screening report has been undertaken and placed on the Council's website and found that a full EqIA is not required. A large part of the Plan area is rural, and the Plan supports proportionate and sustainable development within these areas. It also promotes economic and other regeneration proposals within areas of poverty.
- 3.4 Climate Change / Carbon Clever the development plan has been and will be subject to several rounds of environmental assessment including all aspects of climate change, Habitats Regulations Appraisal (HRA) and Strategic Environmental Assessment (SEA). The SEA's Environmental Report continues to be formulated in close cooperation with the Consultation Authorities and is being updated to reflect that input.
- 3.5 **Risk** as Legal above.
- 3.6 **Gaelic** prior to publication, headings and a Member Foreword will be added in Gaelic.

4 Context

- 4.1 A Local Development Plan provides the land use planning framework for planning advice and decisions, but it also helps the Council, partners and communities to support changes and improvements across Highland and to achieve local and national outcomes. The second Inner Moray Firth Local Development Plan (LDP) (in the rest of this report simply referred to as the 'Plan') will become the principal, local, land use policy document in determining planning applications and other development investment decisions in the Inner Moray Firth area. The Plan area comprises the eastern part of Ross and Cromarty, Inverness-shire, Nairnshire plus a small, mainly unpopulated, part of Badenoch and Strathspey. It stretches from Garve in the west to Tain in the north and from Auldearn in the east to Tomatin and Fort Augustus in the south. At the end of the review process the Plan will replace the existing Inner Moray Firth LDP and will sit alongside the Highland-wide LDP and other planning guidance in providing a comprehensive suite of planning policy for the Plan area.
- 4.2 Any proposed development plan when published must represent a council's collective, 'settled view' on its choice of policies and development sites and the wider strategy for the area. Therefore, this is the last of a series of reports to the seven relevant committees that span the Inner Moray Firth Plan area. This final overarching report is to seek approval for a number of strategic elements of the Plan such as a vision, spatial strategy, outcomes and wider policy issues for the whole Inner Moray Firth area. These matters have already been reported to the six relevant Local/City Committees who were offered an opportunity for input for this committee's consideration. It should be noted that the Council's Indicative Regional Spatial Strategy approved by Members (as part of our contribution to Scottish Government's emerging National Planning Framework 4) has significantly shaped the preparation strategy and the outcomes to which it needs to contribute for people and communities in the area.

4.3 The Plan is being prepared under current but soon to be superseded planning legislation. For plans being prepared under current legislation Scottish Government has instructed that local authorities must publish their proposed development plans before the Scottish Parliament's approval of National Planning Framework 4, which is scheduled to happen sometime between March and June 2022. Therefore, the Highland Council has a short timeframe within which to confirm its collective position through the seven relevant committees or risk the significant work and consultation to date being deemed abortive.

5 Main Issues Report Comments

- 5.1 Following a consultation on the Main Issues Report (MIR) held between January and April 2021 officers have carefully considered all of the comments received. The full version of all comments received has been available on the Council's website since early June 2021. Members covering the Inner Moray Firth area were alerted to those comments at that time and can access them again in preparation for this committee via this link. The strategic issues raised in those comments are summarised in **Appendix 1** together with a recommended response where it is relevant to the Plan's proposed content.
- 5.2 Over 1,400 comments have been received from 432 respondents which is a record total for any version of a Highland development plan, reflecting positively on the publicity undertaken and the online format for making comments. To ensure awareness of the consultation and the process for responding publicity included:-
 - a postcard mailshot to every household in the IMF area;
 - social media publicity;
 - an 'on request' hard copy alternative for reading and commenting on the MIR;
 - online videos to explain the Plan and how to comment; and
 - responses being accepted by email and conventional letter for those unable to access or use the online method.

The comments received are on a wider range of topics than usual which probably reflects that we've reached a more diverse audience than those reached by the traditional methods of paper press notice, public library deposit and village hall exhibitions.

6 The Proposed Plan

- 6.1 The Proposed Plan's substantive content is set out in the appendices to this report. **Appendix 1** details and justifies (taking account of comments received) the recommended strategic content including the Plan's Outcomes, General Policies and Spatial Strategy (including the total housing land requirements and Hinterland boundary).
- 6.2 These strategic matters have been reported to the six relevant Local/City committees for their consideration. The views of the six Local/City committees on these strategic matters are summarised as a column within the table in **Appendix 1** save that for the Nairnshire Committee which only took place yesterday and therefore a verbal update will be provided of any views expressed. Committee will note that local Members endorse almost all of this strategic Plan content except the officer recommendation in terms of the housing in the countryside Hinterland Boundary. Both the Wester Ross, Strathpeffer and Lochalsh Committee and the Easter Ross Committee have indicated their wish that the boundary be contracted within their respective areas.

- 6.3 Vision & Outcomes a reordering of the Plan's outcomes is suggested in **Appendix 1** to better emphasise the Plan's lead aims of addressing the climate change and ecological emergencies whilst also enabling post pandemic economic recovery.
- 6.4 Settlement Hierarchy the hierarchy is recommended as tabulated in **Appendix 1** with the suggested reclassification of Cawdor, Contin and Inchmore as 'Growing' rather than 'Main' Settlements. This means a lower level of expected growth within these villages than that envisaged in the approved development plan to reflect their constraints.
- 6.5 Housing Land Requirements - a minimum target of around 8,500 homes over a 10year period are proposed with roughly 6,000 of these expected to be built on sites allocated in the Plan. The Plan seeks to increase the proportion of these that will be built in environmentally sustainable and economically viable locations and that will be affordable, self-built and/or adapted for the ageing population. The table in **Appendix 1** breaks this target down by Housing Market Area. These figures are derived from base figures produced within a Highland-wide Housing Need and Demand Assessment (HNDA), which will be a supporting document accompanying the Plan's publication. At the time of writing, the HNDA approval process is moving towards completion with the final figures expected to be reported to the Economy and Infrastructure Committee in December 2021. A few wholly new housing development sites have been suggested in response to the Main Issues Report. These should have been made at the Plan's Call for Sites stage and therefore have not been considered in any detail in this report and its appendices. There is no exceptional justification for the inclusion of any of them particularly since they haven't been subject to public comment and environmental assessment. The site allocations in the Plan are considered to have sufficient flexibility to accommodate the minimum identified Housing Land Requirement based on the current national guidance. The Housing Market Partnership. which is a group of senior planning and housing officers, has overseen the HNDA process and inputted policy-based adjustments to the requirement totals to put forward a comprehensive case that all justifiable housing need and demand is included in those totals, working within this national guidance. Further work is being carried out to assess housing need for economic growth.

In addition, the plan outlines measures that aim to increase and expedite the delivery of affordable housing. However, the Partnership remains concerned that wider circumstances and factors may constrain the delivery of sufficient affordable unit completions because of the challenges of acquiring, reserving, and/or servicing land for affordable housing within defined cost constraints when competing with private sector interest in the same sites and where landowners may have artificially high expectations of land values. The Partnership is looking to make enquiries about how these wider national factors might be addressed in Highland including national policies, wider social infrastructure funding (e.g., forward funding of new schools) and/or legislation. Officials are seeking discussions with the relevant Scottish Government officers and Ministers to progress this issue.

6.6 Spatial Strategy – the Map in **Appendix 1** is a visual expression of the broad spatial priorities, settlement hierarchy and infrastructure projects for the Plan area. This strategy should assist in promoting a more coordinated approach in matching new development to infrastructure and community facility investment both corporately across the Council and with external stakeholders.

- 6.7 Hinterland Boundary whilst the views of Local Members are noted, no change is recommended except a minor expansion at Belivat, Nairnshire. The Main Issues Report included options to contract the Housing in the Countryside boundary in Mid and Easter Ross. However, the majority of comments received support the status quo in respect of this issue. Any contraction of the boundary would run contrary to the Council's aspiration to reduce unnecessary and unsustainable travel choices and therefore address climate change. It is also noted that the Rural Housing Supplementary Guidance has been amended to allow further opportunities for housing in the countryside and support the rural economy. This Guidance was approved by this Committee following extensive consultation with Members.
- 6.8 General Policies 13 new or updated (relative to those contained within the Highland wide Local Development Plan (HwLDP)) General Policies are being proposed for the Plan area. These are detailed in **Appendix 1** with a brief summary of comments received on these topics and a justification for the proposed approach. These have been influenced by the Council's input to National Planning Framework 4. The policies give new or greater emphasis to climate change, placemaking, greenspace, sustainable travel, increasing affordable/ageing population/self-build housing, biodiversity, and town centre recovery. These new/amended policies will update (not supersede) those in the HwLDP but will be given primacy by the Council in the application of these policies when the Plan is adopted.
- 6.9 A very brief summary of each policy follows including, if applicable, how each proposes to improve existing Highland planning policy.
 - Policy 1 'Low Carbon Development' introduces a carbon emissions reduction standard, beyond current building regulations, for new build development. A developer will have to evidence that each proposal's siting, materials, design and choice of heat/energy source, generation, storage and use are sufficiently low carbon.
 - Policy 2 'Nature Protection, Preservation and Enhancement' introduces a
 developer requirement to protect and improve biodiversity including a financial
 contribution from larger schemes towards enhancement.
 - Policy 3 'Greenspace' provides a clearer and stronger protection for identified greenspaces.
 - Policy 4 'Green Networks' provides a clearer policy for Green Networks.
 - Policy 5 'Industrial Land' provides a clearer and stronger protection of existing industrial land and a more supportive framework for employment uses elsewhere.
 - Policy 6 'Town Centre First' introduces a stronger protection for identified town centres but also a more supportive approach to change of use proposals including residential within those centres.
 - Policy 7 'Placemaking' provides a policy justification for requiring a developer to audit the impact of its application on the quality of the place, where it is proposed.
 - Policy 8 'Delivery Development and Infrastructure' seeks to ensure a more coordinated and timeous delivery of infrastructure and community facility capacity in parallel with new development.
 - Policy 9 'Increasing Affordable Housing' proposes to: increase the quota to 35% for Inverness City (excluding the City Centre); require earlier private developer phasing of affordable units; and, support higher densities for affordable housing developments.
 - Policy 10 'Self and Custom Build Housing' introduces a quota for serviced plots for the largest (100 plus units) housing sites.

- Policy 11 'Growing Settlements' brings this policy into alignment with other recent Highland area local development plans.
- Policy 12 'Accessible and Adaptable Homes' introduces a quota for wheelchair liveable ground floor units on sites of 50 or more residential dwellings.
- Policy 13 'Transport' directs developers to the most accessible sites and requires them to show that people using their development can travel as easily by walking, wheeling, cycling or public transport as they can by car.

6.10 Settlement-Specific Matters

Our proposed approach to these strategic matters has influenced our place-based recommendations; i.e., our Placemaking Priorities and development site choices.

- 6.11 This place-based content is set out at **Appendix 2.** The six respective Local/City committees (any 1 December Nairnshire Committee changes will be reported verbally) agreed this content subject to the following changes:-
 - Site reference IN85, Castlehill, Inverness the list of acceptable uses changed from Housing to Mixed Use (Housing, Greenspace, Community, Business).
 - Site reference NG01, Nigg Energy Park the site boundary expanded to enclose all that land identified for industry at Nigg within the Main Issues Report 2021 and the adopted Inner Moray Firth Local Development Plan 2015.
 - Site reference EV03, Teandallon East, Evanton a developer requirement added to reference the need for an active travel link and an aspiration for a road bridge over the River Sgitheach to connect to Drummond Road.
- 6.12 The most significant Plan content for each Local/City committee area can be briefly summarised as follows:-
 - Wester Ross, Strathpeffer and Lochalsh a modest level of growth at Strathpeffer and Contin to reflect concerns expressed and limited local infrastructure capacity.
 - Dingwall and Seaforth Committee a decision to consolidate rather than identify wholly new sites for expansion of the 6 main settlements excepting new employment land at Muir of Ord and Maryburgh. Major expansion at Tore is not supported.
 - Black Isle Committee similarly, a decision to limit new growth to existing
 allocated and/or permitted sites except at Cromarty and North Kessock where
 new housing component sites are supported because of the lack of effective
 alternatives.
 - Easter Ross Committee a reduction in allocated land to what's likely to be viable, serviceable and environmentally sustainable except at Tain where local Members have sought a more aspirational level of growth and therefore wider choice of development sites. Continuing and enhanced support for employment expansion at Nigg Energy Park and Highland Deephaven.
 - City of Inverness Area Committee a concentration on completing 'legacy' allocations and permissions rather than identifying wholly new, large development sites except at Knocknagael in Inverness where an expansion site is identified. Otherwise, developer suggestions for large new sites are rejected, most commonly because of a lack of infrastructure and community facility capacity, notably in schools. Existing Economic Development Areas are rolled forward including Whiteness for industrial use only plus an additional area at Fort George to reflect its future availability for a different purpose.

 Nairnshire Committee – growth at Auldearn and Cawdor is scaled back and at Nairn directed to the land thought most viable, serviceable and environmentally sustainable.

7 Proposed Consultation Arrangements

- 7.1 It is suggested that the Proposed Plan be subject to an 8-week consultation period. In order to allow sufficient time to bring together the Plan including factual updates and amendments, artwork, preparation of supporting documentation, neighbour notification and possible printing it is proposed to publish in early Spring 2022. The opportunity to contribute to the consultation will be publicised in local and social media and the Council's website. Immediate neighbours of all sites specifically identified within the Plan will also be notified in line with government legislation.
- 7.2 Given the good number of responses to the Main Issues Report it is suggested that similar methods of consultation are used i.e., targeted use of social media, hard copy mailshots, together with more conventional methods of a paper press notice and telephone assistance for those not online so that they can request hard copy options to read and comment on the documents. We will consider face-to-face meetings if the Scottish Government advice in the Spring of 2022 allows such events.

8 Next Steps

8.1 Following the consultation period on the Plan, Members will be briefed on representations received. Any party whose comments do not align with the Council's 'settled view' will have an opportunity to have its opinions heard at Examination (similar to a public local inquiry) by an independent Scottish Government appointed Reporter, who then makes binding recommendations on the Plan's final, adopted content.

Designation: Executive Chief Officer Infrastructure, Environment & Economy

Date: 19 November 2021

Authors: Scott Dalgarno, Development Plans Manager

Tim Stott, Principal Planner
Julie-Ann Bain, Planner
Douglas Chisholm, Planner
Craig Bayter, Planner

Craig Baxter, Planner Matthew Hilton, Planner Lynn MacKay, Planner

Background Papers: 1. Inner Moray Firth LDP: Main Issues Report: January 2021;

2. Comments Received on Main Issues Report: January to April 2021:

3. Inner Moray Firth LDP: Strategic Environmental Assessment: draft Environmental Report: 2021.

The above information is available at: www.highland.gov.uk/imfldp

APPENDIX 1: STRATEGIC ISSUES: SUMMARY OF COMMENTS ON STRATEGIC ISSUES, RECOMMENDATIONS & PLAN CONTENT

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|---|--|--------------------------------|--|
| Plan General 11 comments | Query whether Council make decisions in line with its own Plan and enforce it. Criticism of consultation's timetable, complexity, and ease of use of Portal. Criticism regarding lack of detailed general policies for respondents to react to. Objection to use of permitted development rights for road accesses. Desire for Plan to control negative impacts of forestry. Praise for a logical and well laid out document. Desire for greater community control via Local Place Plan. Request for Plan to take account of independence and likely impact on public finances. Request for greater references to role of natural heritage in placemaking and health. | None. | No additional Plan content other than greater references to the positive effects of natural heritage. Some of the criticisms of the consultation software were well founded but we introduced several workarounds before and during the consultation proposal and continue to work with the relevant external company to improve the customer's experience. The other comments raise matters outwith the Plan's scope or control. |
| New Development Site Suggestions | A few wholly new, mainly housing, development sites have been suggested in response to the Main Issues Report. | None. | These should have been made at the Plan's Call for Sites stage and therefore have not been considered in any detail in this report and its appendices. There is no exceptional justification for the inclusion of any of them particularly since they haven't been subject to public comment and environmental assessment. Proponents will have the option to test their suitability via an objection to this Plan, a planning application and/or wait for the next plan review. |
| Vision & Outcomes 14 comments | Request for reference to national coastal policy. General support for Plan approach on greenspace, travel and climate change but desire for stronger policies and enforcement. Query whether Inverness road schemes run contrary to Outcomes. One suggestion that Outcomes should be changed to support car based, rural development with relaxed approach to housing design. Request for more overt link between habitat enhancement and climate emergency. Request for all communities to be allowed to grow without control. Request for better recognition of Environment as an asset that should be enhanced. Request on reference to link between climate change and built heritage. Request for reference to local setting of outcomes. | None. | Additional Plan content: on importance of natural heritage as an asset that should be enhanced; to cross reference national coastal policy; to make an explicit link between habitat enhancement and the ecological emergency; and, between climate change and built heritage. Most respondents support the principle of the Council's Vision and Outcomes. The changes requested by the other, minority, polarised opinions are not recommended for inclusion as they would run contrary to established Scottish Government and Council policy. |
| Addressing the Climate and Ecological Emergency | The majority of the general comments about the Climate and Ecological Emergency were supportive. A range of comments and considerations were suggested, including: more awareness raising of the Emergency; | None. | The positive response to the proposed approach to the Emergency is welcomed, the range of suggestions for how to tackle the Emergency have been considered in the preparation of the Proposed Plan, several of which are detailed in the specific sections in the following rows of this table. |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|------------------------|---|--------------------------------|---|
| Climate Change | tackling carbon emissions from transport; reducing | | It is recognised that there is a suite of national policy, legislation and |
| General | deforestation in Highland, including referring to Scottish | | regulation that relates to the Emergency so it is not repeated in the Plan, but |
| 59 comments | Government's Control of Woodland Removal Policy; | | rather forms part of the range of Material Considerations that are used in |
| | avoiding new development on greenfield sites; | | the determination of planning applications. |
| | recognising the positive role of allotments and growing | | |
| | space in tackling the Emergency; making more efficient | | |
| | use of space in new development, incorporating more | | |
| | green and blue infrastructure and biodiversity | | |
| | enhancements. Other comments included concerns | | |
| | about Sea level rise, including in Nairn, and the impacts | | |
| | increased warming will have on built up areas. An | | |
| | assertion that windfarms will adversely impact the | | |
| | tourist economy and should be located closer to the | | |
| | central belt where the greatest demand for energy is | | |
| | and, the suggestion to factor in embedded carbon into | | |
| | the climate impacts of development. It was suggested | | |
| | by two respondents that the ecological component of | | |
| | the emergency be further developed, and that the Plan | | |
| | should work to deliver carbon neutrality by 2045, in line | | |
| | with the Climate Change (Scotland) Act. The role of | | |
| | crofting as a sustainable land use was also suggested to | | |
| | be recognised in relation to the Emergency. | | |
| Addressing the Climate | Virtually all respondents who expressed a view | None. | The Scottish Government are expected to introduce a national policy |
| and Ecological | supported the principle of addressing climate change | | framework to improve the sustainability of development and set minimum |
| Emergency | and moving towards more energy efficient | | standards. They are also currently consulting on expanding energy |
| Efficient Use of Heat | development. However, several respondents, including | | efficiency building regulations. However, we will not know the outcome of |
| 7 comments | some large housebuilders, stated that the best way to | | either of these by the time we finalise the Proposed Plan. To ensure that |
| | tackle the issue is through building regulations and not | | the Council fulfils its contribution to reaching national net zero targets we |
| | planning policy. Two respondents highlight the need for a better evidence base for such a policy. Several | | need to ensure that appropriate measures are introduced. |
| | respondents who supported the policy requested that it | | Taking account of comments and further research, rather than the policy |
| | be more prescriptive with certain features, e.g. PV | | exclusively seeking to deliver sustainable heating systems (as indicated in |
| | panels, being mandatory. One respondent highlighted | | the MIR), the policy included in the Proposed Plan (see below) now focuses |
| | that the need to improve the efficiency of the existing | | on the development as a whole. The policy introduces a standard reduction |
| | building stock is of greater priority than new | | which new build development will be required to meet, i.e. reduction in |
| | development. Several respondents highlight that | | carbon emissions based on current levels. This represents a significant |
| | transitioning to hydrogen may offer the most energy | | change from the current position and means the developers will need to |
| | efficient source. | | |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|--|--|--------------------------------|--|
| | | | address several aspects of energy usage and generation as part of development proposals. |
| Addressing the Climate and Ecological Emergency Biodiversity Enhancement | Housing developers object to the proposed policy and instead argue that on-site biodiversity enhancement is more appropriate, without the need for developer financial contributions. Private contributors (including Glenurquhart | None. | See detailed <i>Nature protection, preserving and enhancement</i> policy wording below. This is a new policy direction across Highland LDP's and has been developed to address the Council Climate & Ecological Emergency declaration and the international issue of biodiversity loss. |
| 16 comments | Community Council) support the policy approach, whilst a number comment that they are disappointed with the ecological element and biodiversity sections policies and hope these issues are further developed to ensure a positive effect for biodiversity is delivered. | | The proposed policy has been designed to ensure biodiversity loss is considered and addressed for all forms of development, but on larger sites seek a financial developer contribution to achieve a net-biodiversity improvement. |
| Supporting a strong, diverse and sustainable economy Employment land and sites 6 comments | Overall, respondents agree with the suggested approach set out in the MIR to support the economy to recover, progress and transition, including continuing to allocate larger, strategic employment development sites and the new emphasis on smaller scale industrial / enterprise space within residential / urban fringe development as a means of promoting mixed communities. One community council raised compatibility concerns with the town centre first policy. One industrial business owner highlighted the Council's failure to protect noise generating businesses from residential development. Several respondents, including two community councils, emphasised the importance of prioritising brownfield land over greenfield. Landowner of Fearn Aerodrome EDA objects to its deallocation. Comments were received in | None. | Additional Plan content proposed including a new feature added to the Spatial Strategy map to highlight the strategic role which the Inner Moray Firth area can play, particularly the key ports, in supporting the regional and national transition to a green economy and the deployment of renewable and low carbon energy generation. A revamped Industrial Land Policy (see detail below) requiring employment land to feature within large residential developments (as outlined the MIR) and that will also safeguard existing industrial sites and allocations from other uses and encourage residential developers to bring forward small scale employment components where appropriate. This policy will also refer to the 'agent of change' principle to safeguard existing noise generating businesses. Our site selection process has focused on brownfield land, with allocation of greenfield land only supported where no reasonable alternative is available. |
| | support and against the Freeport bid, particular concerns related to a perceived relaxation of environmental regulations. | | |
| Supporting a strong, diverse and sustainable economy Growing Sustainable Tourism 28 comments | There was widespread support for growing the tourism industry and most respondents agree that it must be done sustainably. This includes appropriate levels of infrastructure delivery (e.g. sufficient investment in active travel and public transport and toilets / waste management facilities) and only where the environment and natural assets are not undermined by development. The impacts and benefits also need to be | None. | The approach set out in the MIR aligns with many of the comments - particularly the need for the tourism industry to grow sustainability (in terms of infrastructure delivery and providing more sustainable transport options). We propose to continue this position within the Plan. On the Spatial Strategy Map we propose to include Sustainable Tourism Potential Growth Areas which highlight where upgraded infrastructure is in place or being actively planned to support wider tourism development. This includes the Loch Ness area shown in the MIR, together with the area covering the |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|--|--|--------------------------------|--|
| | considered in relation to the effect on local communities. | | north east of the Black Isle and part of the Nigg Peninsula in Easter Ross, and Nairn. |
| | Several respondents raised concerns about Loch Ness being the only area identified on the map. Some suggested that the Black Isle, Strathdearn, Easter Ross and Nairn form equally important tourism areas. Two respondents questioned the appropriateness of North Sutor (viability and adjoining 'bad neighbour') for tourism development. | | The reference to the Agent of Change principle included within the Industrial Land Policy will ensure that sites such as Port of Nigg are not affected by more noise sensitive uses proposed nearby. |
| Growing the most sustainable places Housing Requirements 25 comments | Objectors to further development claim figures too high and development industry claim figures too low. Some support for stated figures. Some wish a greater proportion of total to be safeguarded for a particular sector, e.g. young, locals, crofters, affordable, self-build and/or elderly. Some developers dispute whether capacity of preferred sites will meet all requirements and claim some of these sites are not effective. Several point out Housing Need and Demand Assessment (HNDA) is out of date and should be done first. Developers claim figures should include aspirational, economic recovery, high in-migration requirements. Some developers suggest additional sites to meet housing requirements. One suggestion that requirements should be based on infrastructure capacity not need/demand. | None. | See below for detailed table of Housing Requirements. This recommends that the Plan's Housing Requirements be based on a new HNDA but with this base number adjusted upwards to reflect future ineffective stock, an allowance for flexibility/choice, currently unaccounted for housing need, and an economic recovery aspiration within the Mid and East Ross Housing Market Areas where Opportunity Cromarty Firth will hopefully lead to a new jobs-led growth in housing need/demand. Unfortunately, the Council cannot specify in its Plan that certain sites are reserved for certain sectors or types of people. This may be desirable but would require a change in national legislation. We must identify a total housing land supply based on all assessed need and demand not other factors such as infrastructure capacity. |
| Growing the most sustainable places Settlement Hierarchy 44 comments | Some believe the hierarchy should be based solely on infrastructure capacity. One respondent disagrees that the hierarchy should be based on where it's economic to add infrastructure capacity. Several respondents believe the hierarchy is too prescriptive and that each community or the development industry should decide how much growth it wants. Most support the hierarchy as listed and want it enforced. Some respondents want Drumnadrochit, Nairn, North Kessock, Avoch and Fortrose/Rosemarkie to be in a lower tier as they are not currently sustainable locations for growth. One respondent disagrees that rural areas should have less growth. One respondent wants Culbokie to be a higher tier settlement because it has spare infrastructure | None. | Reaffirm hierarchy trailed in Main Issues Report – i.e. the only changes are Cawdor, Contin and Inchmore changing from Main to Growing Settlements (detailed table below). Objectors seek reclassifications to reduce growth and the development industry to increase it in particular locations. However, the majority of respondents agree the viability / sustainability basis for classifying settlements and directing growth. Infrastructure capacity is one criterion in shaping the hierarchy but shouldn't be the primary one if climate change and other environmental issues are to be addressed within Highland. The wider Plan content requires / supports improved active travel links within and between identified settlements. Evanton and Tomatin's classification is not based solely on their potential rail halt connections. |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|--|--|--------------------------------|---|
| | capacity. Landowners at Inchmore, Fort George, Ardross, Whiteness, Portmahomack, Borlum, Bunoit, Tore want their locations classified as higher tier settlement. Request that lower tier settlements have good active travel links to higher order centres. Network Rail don't support Evanton and Tomatin being in a higher tier because no commitment to investment in rail halts at these locations. | | |
| Growing the most sustainable places Growing Settlements General Policy 16 comments | Most comments are supportive of the proposed policy. One suggests that net positive impact should be the sole criterion in deciding whether to support a rural development. Some respondents believe development should only be supported if there's: a full Sustainability Assessment undertaken; adequate transport capacity; adequate heritage safeguards/enhancement; improved active travel connectivity; home working; demonstrable benefit to and support from the local community; and/or, low carbon impact. | None. | See detailed <i>Growing Settlements</i> policy wording below. This wording is very similar to that used in other adopted Highland development plans to ensure a consistent approach. The individual topics highlighted by respondents are addressed by the list of criteria however we don't agree that an overriding positive or negative presumption in favour or against development should apply based on any single criterion or factor. |
| Growing the most sustainable places Self Build Housing General Policy 25 comments | The majority of respondents (including Lochardil Drummond Community Council & Dores and Essich Community Council) agree with the Council's ambition to increase self-build housing, but all the major housebuilders disagree with the proposed policy, as they believe it could affect the viability of delivering housing, have implications on site health and safety and the ability timely to deliver site services. A number of respondents highlighted that this appears to be a fast-growing sector and more should be done to promote it because it; delivers a variety of types, styles and sizes of houses; and could support co-operatives and community-led housing schemes. Conversely, a number of responses question the need for a policy on self build, arguing that it is untested within urban areas and that anecdotal evidence is that most self-builders wish to reside in the countryside. A landowner and a respondent support the allocation of sites for Self-build rather than the proposed policy approach. | None. | See detailed <i>Self & Custom Building Housing</i> policy wording below. This is a new policy direction across Highland LDP's and has been developed to promote and support urban self-build plots, as such it is understandable that some adverse comments have been received. However, both the Scottish Government and Council wishes to support this sector. We propose adjustments to the MIR approach, the main one is pushing the threshold when the policy is enacted up to 100 (it was 20 in the MIR). Doing so reduces the number of plots being delivered by the policy, which allows the policy to be tested and avoids the provision of a lot of single self build plots in smaller developments. An alternative approach of allocating sites for self build within urban areas was fully considered but has been ruled out as the proposed policy offers greater flexibility and avoids making allocations undeliverable. |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|--|--|--------------------------------|--|
| | One respondent suggested that the threshold at which the policy is proposed to be applied is too high and should be lowered to 10 or 15 units. | | |
| Growing the most sustainable places Town Centre First General Policy 28 comments | The vast majority (almost 90%) of respondents support the proposed Town Centre First Policy. This included Lochardil Drummond Community Council and Dores and Essich Community Council and organisations such as the owners of the Eastgate Shopping Centre. Respondents also highlighted: the uncertainty which the pandemic will have on town centres; greater effort required to make town centres sustainable, high quality, welcoming and attractive places; and, greater mixture of housing options and not a concentration of bedsits etc. | None. | We propose to take forward the <i>Town Centre First Policy</i> (see below) in a similar fashion as shown in the MIR but with several amendments, including: clarifying the requirement that footfall generating uses <i>must</i> be located in town centres and the highlight the expectations of any sequential assessment; and, providing greater certainty and flexibility for change of use proposals. Other amendments include: highlighting within the policy the potential for a reduction/removal of the standard 25% affordable housing contribution policy as a means of encouraging a greater mix of housing types/tenures; and, the inclusion of reference to the Agent of Change principle to help protect existing noise generating businesses. |
| | Requests were made to: allow greater flexibility and provide certainty for redevelopment proposals to other uses; tighten up on preventing footfall generating uses out of town centres; and, allow the wide range of uses supported in the policy to be reflected in the town centre allocations. One respondent highlighted that the planning policy is not effective to deal with the issue. | | |
| Delivering Affordable Housing General Policy 27 comments | not effective to deal with the issue. Some respondents seek a stronger policy to achieve more houses, lower prices and lower rents. Some agree with the proposed approach. Developers disagree with any further intervention in the private housing market as it will undermine viability. Developers claim best way to increase affordable units is to increase total requirement – i.e. 25% of a bigger number. One comment that smaller units will be more affordable. One comment suggests preventing loss of stock to holiday homes. One comment suggests policy should apply to less than 4 units another that it should be increased to 12. One comment that 35% target should apply to whole Plan area. One comment seeks closer geographic ring fencing for commuted payments. One respondent seeks a quota based on bedrooms not units to allow a developer to provide fewer but larger | None. | See detailed <i>Increasing Affordable Housing</i> policy wording below. This wording reaffirms that we will seek 35% affordable housing within Inverness City but now excepting proposals within the City Centre boundary. It also encourages the earlier phasing of affordable units within larger sites and accepts higher densities for affordable housing developments if placemaking is not compromised. See above regarding the legitimate scope to increase overall housing requirements. The threshold of 4 units is embodied within the current Highland wide Local Development Plan and needs to await that Plan's review. Increasing to 35% requires a local, specific justification which we believe is only reasonable for Inverness City. The geographic ring fencing of commuted payments should be reviewed but will need to await the review of the relevant detailed guidance. The suggestions regarding a use class, allocations and occupancy control to ensure more affordable units are sensible but would require national legislative change. The suggestion for a quota based on bedrooms not units may not address the housing type breakdown of need in a particular community but will be discussed with |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|---|---|--------------------------------|--|
| | affordable units. One respondent seeks an affordable housing use class and affordable housing only allocations. | | providers to see whether the detailed guidance on affordable housing should be amended to allow this as an option for developers. |
| Matching development with infrastructure capacity 26 comments Creating a more | Many respondents believe infrastructure and community facility capacity should be in place before or at the same time as new development. Comments that facilities should include healthcare, greenspace and active travel network capacity. Developers believe it will be unviable for them to provide infrastructure first. One suggestion for development moratorium until public finances can catch up and provide capacity. Suggestion for more public money to resolve deficiencies. Network Rail seek developer contributions to offset impacts on rail capacity. Most respondents support the proposed approach to | None. | See detailed <i>Delivering Development and Infrastructure</i> policy wording below. This wording adds health facility, rail and active travel network capacity and an onus on the developer and the Council to better check and assess the impact of individual developments on the capacity of listed community facility and infrastructure network capacities. It introduces a presumption against proposals that don't demonstrate that adequate capacity exists or can be created. The Council's detailed guidance on developer contributions already allows developers to produce evidence that Council requirements make a site unviable. The other respondent suggestions are interesting but would require central government financial intervention which is a matter outwith the Plan's control. The Proposed Plan sets out the key interventions required to deliver |
| healthy, sustainable transport network Sustainable Transport Policy & Sustainable Transport Interventions 80 comments | creating a more healthy, sustainable transport network. The broad range of benefits, in terms of environment, public health and alleviating congestion are recognised. Support for community involvement in delivery of active travel infrastructure, with a range of place-specific improvements suggested. Suggestion to place emphasis on public transport (bus and rail) to reduce car-dependence. Support for delivery of improved Electric Vehicle infrastructure and network planning, but some respondents highlighting that there is still pollution associated with this mode of transport, along with prohibitive costs for those on lower incomes. Suggestion for parking charges to be raised by the Council; for a blanket implementation of 20 mph in settlements, and some disagreement about the assertion that building more roads increases congestion. Suggestion for the preparation of an action plan to deliver the strategy proposed, with a focus on a green recovery from Covid-19. Some concerns from developers and landowners about the role of a new transport policy, and if it will be too onerous for development sites outwith Inverness. | | transport improvements across the region, including active travel network improvements; public transport development, and road network improvements. Details of these interventions are high-level and will require further feasibility and design development, which will bring with it a full opportunity for public consultation and Member scrutiny. Electric vehicles and public transport are explicitly recognised as key components of the transport strategy for the Plan area, particularly in supporting those living in rural areas, or where longer journeys are involved. Coupled with active travel improvements in more urban areas, public transport and electric vehicle improvements will deliver the vision for a more mixed, less carbonintensive transport network. The <i>Transport Policy</i> set out in the Proposed Plan (see below) provides the opportunity for flexibility and measurement of transport impacts relative to the place and journeys where a development proposal is located. |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|----------------------|---|--------------------------------|--|
| Identifying and | Most respondents support the proposed approach to | None. | Suggestions received for new greenspaces were incorporated into the audit |
| safeguarding valued, | safeguarding greenspace and green networks. A range | | of greenspace that has informed the Proposed Plan. Suggestions for changes |
| local green space | of suggestions were made to improve the approach, | | to the methodology, the policies and the requirements placed upon |
| Greenspace Audit and | including: an audit of existing greenspace; specific | | developers have all been taken into account in undertaking the audit and in |
| Policy | requirements for areas of greenspace such as for food | | preparing the Proposed Plan. The work undertaken has resulted in |
| 46 comments | growing to be defined; using greenspace designations | | greenspace and green networks being safeguarded through policy and |
| and Green Networks | to inform the Woodland Strategy; using developer | | mapping in the Proposed Plan, it is therefore considered that this provides |
| Policy | contributions to purchase amenity land; involving | | the correct level of protection for these areas. It is considered that |
| 17 comments | communities in deciding what greenspace to safeguard; | | safeguarding greenspace and green networks within Settlement Development Areas is the appropriate approach, and that outwith these |
| | mapping of greenspace to be protected; design and | | areas Highland-wide Local Development Plan policies be applied. See |
| | stock new greenspace with native species to improve | | Appendix 1 for proposed greenspaces for each main settlement. |
| | biodiversity; focus of safeguarding as well as | | Appendix 2 for proposed greenspaces for each main section entities |
| | enhancement, including outlining opportunities for | | |
| | these spaces in the Plan; recognise croft land as | | |
| | greenspace, and better define green infrastructure. | | |
| | Several comments were received suggesting | | |
| | greenspaces to be considered and changes to the | | |
| | proposed audit methodology. One respondent | | |
| | considered there was insufficient information and | | |
| | provision for new greenspaces to be suggested for | | |
| | inclusion. One respondent disagreed with the | | |
| | Greenspace policy, arguing it did not provide adequate | | |
| | protection, compared to an area being within the | | |
| | Hinterland, and that greenspace should be safeguarded | | |
| | outwith Settlement Development Area boundaries. | | |
| Placemaking | Most respondents (including Dores and Essich | None. | See detailed <i>Placemaking</i> policy wording below and detailed Placemaking |
| 29 comments | Community Council, Glenurquhart Community Council | | Audit. It is pleasing to note that most contributors support the policy & the |
| | & Nairn River Community Council), most multiple | | Placemaking Audit. |
| | housebuilders support the proposed policy, providing if | | |
| | offers sufficient flexibility; the audit is not overly | | As per the suggestions, the Audit has been updated to respect the |
| | prescriptive; considers the broader impacts of a | | comments and it (and the policy) has been developed to provide sufficient |
| | development; and respects Community Action Plans | | flexibility in its use. |
| | and Local Place Plans. | | |
| | A number of respondents suggest minor amendments | | |
| | to the criteria outlined within the Placemaking Audit. One respondent believes the Planning System needs to | | |
| | be streamlined, not making it more complex / | | |
| | De streammed, not making it more complex / | | |

| Plan Section | MIR Comments Summary | Local/City Committee* Views | Officer Recommendations & Reasons |
|----------------------|--|--------------------------------|---|
| | demanding and it is not clear how these new tools are | | |
| | to be used, and on what size of development. | | |
| Meeting the needs of | Most housebuilders and a small number of respondents | None. | See detailed Accessible and Adaptable Homes policy wording below. This is |
| an ageing population | object to the proposed policy as: Definitive quotas are | | a new policy direction across Highland LDP's and has been developed to |
| 30 comments | an inappropriate instrument; policy coupled with other | | address Highland's rapidly aging population, evidence of which is included in |
| | percentage policies (AH & SBP) will be too restrictive on | | the policy supporting text. Following consideration of the MIR feedback, the |
| | the housing mix; The policy could have a negative effect | | policy has been restricted to cover the ground-floor and access to the |
| | on affordability of housing; The benefits of this need to | | properties only. Whilst this policy is primarily developed to support |
| | be carefully weighed against the effect on housing | | Highland's ageing population, the properties it will deliver, can be occupied |
| | affordability and increase in unviable zonings; No data | | by any wheelchair disabled occupant and therefore will support all Highland |
| | on need has been presented, so unable to confirm if | | residents regardless of age. |
| | Highland is currently experiencing issues with a lack of | | |
| | supply of this tenure; If there was a demand the | | |
| | development industry would deliver the required type | | |
| | and mix and therefore it should be market led rather | | |
| | than planning policy; and Policy is not required as | | |
| | Housing for Varying Needs requires adaptable homes | | |
| | and building standards are expected to be reviewed in | | |
| | 2021 which will both cover this need. | | |
| | Conversely, one housebuilder, one private developer, | | |
| | Dores and Essich Community Council, Ferintosh | | |
| | Community Council, and a number of private | | |
| | comments support the proposed policy, with one | | |
| | stating that as Highland population is aging the | | |
| | percentage as proposed is too low. However, it was | | |
| | also suggested that the policy favours the elderly, when | | |
| | priority should be in retaining the youth and educated, | | |
| | skilled individuals. | | |
| | A number of respondents suggested changes to the | | |
| | policy, including: relating to ground floors of properties | | |
| | and on level plots only; Housing quality should be the | | |
| | same as other properties within the development; the | | |
| | form of housing tenure to be sited in consideration with | | |
| | accessibility to local services; Include the provision of | | |
| | 'smarthousing' to combat pressures of social care and | | |
| | isolation (FIT Housing / nextdoor software); and Policy | | |
| | should include refurbished and converted properties. | | |
| Spatial Strategy Map | Respondents expressed general support for the Spatial | The Easter Ross | The amended Spatial Strategy Map is shown below. Strategic active travel |
| & General | Strategy (although see Settlement Hierarchy comments | Committee agreed to | routes have been added. Green networks and spaces are only depicted at |
| 5 comments | | expand the Economic | |

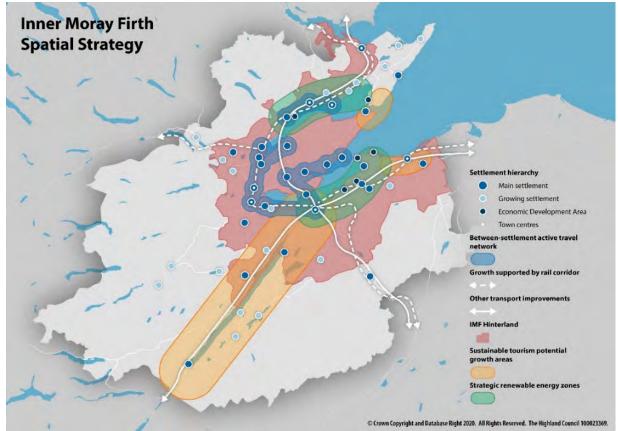
| Plan Section | MIR Comments Summary | Local/City | Officer Recommendations & Reasons |
|---------------------|---|-------------------------|---|
| | | Committee* Views | |
| | above). Some wished for more emphasis on green | Development Area | the main settlement scale where they have been audited and where they |
| | assets and strategic active travel routes. | boundary for Nigg | can most appropriately be safeguarded / enhanced. |
| | | Energy Park. This is | |
| | | referenced given the | |
| | | strategic significance | |
| | | of the site. | |
| Housing in the | Most respondents want the Hinterland Boundary | The Wester Ross, | The proposed Hinterland boundary is shown on the Spatial Strategy Map |
| Countryside | retained as existing as better for the environment and | Strathpeffer and | below. This reaffirms a largely unchanged boundary save the minor |
| Hinterland Boundary | public purse. One comment seeks its expansion. One | Lochalsh Committee | expansion at Belivat, Nairnshire. The majority of respondents support this |
| 27 comments | comment wants its related Hinterland policy changed to | (at Main Issues | approach. Those wishing to change the related policy and list of permissible |
| | prevent holiday home exceptions. One landowner seeks | Report stage) sought | exceptions to the negative presumption will need to await the review of that |
| | a more positive policy around Tomatin. One respondent | a contraction of the | policy in the Highland wide Local Development Plan. The boundary |
| | seeks a weaker related policy that allows self build for | Hinterland to the | contraction suggestions would not be good for the environment or the |
| | locals. Two respondents seek an exception for related | Inverness and | public purse and are therefore not recommended. Moreover, any |
| | family need. One seeks a tighter policy at Blackpark and | Strathpeffer side of | contraction of the boundary would run contrary to the Council's aspiration |
| | one at Kirkhill / Bunchrew. One developer seeks the removal from the Hinterland of Rhicullen / Newmore. | Contin. | to reduce unnecessary and unsustainable travel choices as part of its stated commitment to addressing climate change. It is also noted that the Rural |
| | | The Easter Ross | Housing Supplementary Guidance has been amended to allow further |
| | | Committee | opportunities for housing in the countryside and support the rural economy |
| | | recommend to the | and therefore a further loosening of policy is not considered necessary. |
| | | Economy & | |
| | | Infrastructure | |
| | | committee that the | |
| | | Hinterland Boundary | |
| | | for Wards 6 and 7 be | |
| | | changed to remove | |
| | | all areas of Hinterland | |
| | | within those wards. | |

^{*} Any Nairnshire Committee views will be reported verbally as the meeting takes place on 1 December 2021.

Updated Plan Outcomes

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. **Environment** re-used, located and designed in a carbon clever way. The environmental quality of all places will be safeguarded and where possible enhanced. The Inner Moray Firth economy will be growing, greener, circular and diverse. Local enterprises will be national leaders in the life sciences, sustainable **Employment** 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. 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 **Growing Communities** 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. 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, Connectivity 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.

Updated Spatial Strategy Map



Updated Settlement Hierarchy

| Scale of Growth | Sustainability | Hierarchy | Tier | Settlements/Locations |
|---|--|------------------------|------|--|
| Strategic | Most sustainable | | 1 | Alness, Beauly, Dingwall, Invergordon, Inverness City, Muir of Ord, Nairn, Tain, Tornagrain. |
| Modest | Sustainable | Main | 2 | Ardersier, Conon Bridge, Drumnadrochit, Evanton, Fort Augustus, North Kessock. |
| Local | Partially sustainable | Settlements | 3 | Auldearn, Avoch, Croy, Fortrose and Rosemarkie, Kiltarlity, Maryburgh, Seaboard Villages, Strathpeffer, Tomatin. |
| Limited | Least sustainable | | 4 | Cromarty, Culbokie, Dores, Kirkhill, Munlochy, Tore. |
| "Infill" only | Bolstering the smallest established rural communities | Growing Settlements | 5 | Abriachan, Balnain, Barbaraville, Cannich, Cawdor, Contin, Farr/Inverarnie, Foyers, Garve, Gorthleck, Inchmore, Hill of Fearn, Inver, Milton of Kildary, Marybank, Portmahomack, Rhicullen/Newmore, Tomich, Whitebridge. |
| Typically single unit development | Generally poor sustainability unless connection with rural land use / business | 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). |

Housing Requirements

10 Year (2020-2029) Inner Moray Firth Plan Area Minimum Housing Requirement (MHLR) Based on 2020 HNDA

| Housing Market Area (HMA)(1) Housing Sector (2) | Inverness | East Ross | Mid Ross | Nairn | West Ross (part) | Plan Area Totals (3) |
|---|-----------|-----------|----------|-------|---------------------|-------------------------|
| Affordable | 4,292 | 513 | 830 | 363 | 99 | 6,097 |
| Open Market | 1,435 | 239 | 526 | 151 | 39 | 2,390 |
| Totals (3) | 5,726 | 752 | 1,356 | 513 | 137 | 8,484 |

⁽¹⁾ Assumes a zero requirement for that portion of the Badenoch & Strathspey HMA that lies within the IMFLDP area because the housing numbers are negligible. 26% of West Ross HMA based on geographic area proportion.

⁽²⁾ The Market sector is defined as owner occupier and private rent homes. The Affordable sector is social rent and other below market rent properties.

⁽³⁾ Some column and row totals don't sum exactly due to rounding.

Policy 1: Low Carbon Development

Each new build development proposal must demonstrate that it meets or exceeds the target of a 75% reduction in carbon emissions, compared to buildings delivered in line with minimum requirements of current Building Standards.

A Low Carbon Development Section must be included within the Supporting Statement submitted as part of an application which clearly outlines how this target will be achieved. The Council's Low Carbon Development Guidance document should be used to inform the statement and it is expected that the following components will need to be addressed:

- 1. 'Fabric first' approach to maximise the thermal efficiency of the building
- 2. Siting and design to maximise and manage solar gain
- 3. On-site renewable energy generation
- 4. On-site energy storage
- 5. Zero direct emissions at source heating / cooling low carbon heat source
- 6. Future proofed electricity load capacity
- 7. Other methods and innovations to decarbonise development

For proposals with space heating needs which are located within areas identified by the Council as a Heat Network Zone (included within the Low Carbon Development Guidance):

- All developments will be required to connect to an existing heat network where available. Where one does not already exist, Major Developments will be required to create a new heat network.
- Where applications can demonstrate that connection to or creation of a heat network is not viable as part of the
 development, the proposal will need to be future proofed to allow connections to heat networks when one
 becomes available. In such cases an agreed network design will be required.
- Where the applicant can demonstrate that connection to a heat network is neither viable nor the most appropriate heating solution, both as part of the development and likely in the future, alternative low carbon emitting heat arrangements will be required

Outwith Heat Network Zones, developers are encouraged to consider the creation of or connection to existing heat networks as a means of heating system.

Whilst the development proposals listed below are exempt from this policy, the Council would encourage developers to consider the broad issues and opportunities to deliver low carbon development:

- Buildings which will not be heated or cooled other than by heating provided solely for the purpose of frost protection;
- Buildings which have an intended life of less than two years;
- Any other buildings exempt from Building Standards.

Policy 2: Nature Protection, Preservation and Enhancement

All developments must contribute to the enhancement of biodiversity, including restoring degraded habitats and building and strengthening nature networks and the connections between them. Any potential adverse impacts of development proposals on biodiversity, nature networks and the natural environment must be minimised through careful planning and design.

Design and layouts should consider reversing biodiversity loss, safeguarding the services that the natural environment provides and building the resilience of nature by enhancing nature networks and maximising the potential for restoration.

Local Developments

Local developments will only be supported if they include appropriate measures to integrate nature-based solutions and enhance biodiversity, in proportion to the nature and scale of the proposed development.

Alongside any direct development enhancements, all new residential developments and all commercial, business and retail developments over 500sq.m will be expected to pay a developer contribution sum to facilitate collective biodiversity enhancement across the wider Inner Moray Firth area.

The collective biodiversity enhancement developer contribution value is set out above and will be calculated on the application total site area, minus any high-quality biodiversity-rich habitat, e.g. communal woodland, peatland, wetland and greenspace which safeguards/enhances biodiversity on the site.

Householder developments are excluded from this requirement.

National, Major & EIA Developments

Developments proposals for national, major and EIA development or development for which an Appropriate Assessment is required will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.

To inform this, proposals should:

- be based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats or species;
- wherever feasible, integrate and make best use of nature-based solutions, demonstrating how this has been achieved;
- be supported by an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
- provide significant biodiversity enhancements, in addition to any proposed mitigation.

Biodiversity enhancements proposed through development will require to be delivered within an agreed timescale and should include supporting nature networks, linking to and strengthening habitat connectivity within and beyond the development, where appropriate. Any submission should include management arrangements for long-term retention and monitoring of the approved biodiversity enhancements, wherever appropriate.

Policy 3: Greenspace

Greenspace identified in the maps within this document is safeguarded from development. For sport sites only, there may be circumstances where development may be acceptable, only if:

- It can be demonstrated that development on a minor part of a greenspace safeguarded for formal sports use would not affect its use for this purpose; or
- It can be demonstrated that development on a sports 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.

Policy 4: Green Networks

Development proposals within or close to an identified Green Network will be assessed the extent to which it:

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

Policy 5: Industrial Land

All sites allocated for Industry in this Plan are safeguarded for Classes 4, 5 and 6 uses only.

All **existing industrial sites** will be safeguarded for such uses and proposals to redevelop them to uses other than class 4, 5 and 6 will not be supported.

Proposals for new industrial development on **land not allocated** in this plan, including land outwith settlement development areas, will be supported if it can be demonstrated that it is a sustainable location, including whether the site:

- has good levels of accessibility for staff and/or customers;
- does not adversely impact the amenity of neighbouring properties; and
- does not adversely impact the environment (see general policies in HwLDP)

Small scale industrial units (Class 4, 5 and 6) between 40 to 100m² will be encouraged as part of large residential developments (30 units or more) as a means of providing mixed communities with local employment/enterprise opportunities. Council support is dependent on the applicant demonstrating that there is no adverse impact on the proposed or existing residents of the area and the transport network and suitable waste management arrangements can be established. Siting and design and landscaping will likely be important mitigation measures for addressing potential amenity impacts. In areas of high industrial demand and where a public body has the resources to take forward the development, a gifted transfer of serviced land with suitable road access would be welcomed.

Proposals which seek to change the use of an industrial site will only be allowed in exceptional cases. Applications must be supported by an Industrial Land Impact Statement which provides a clear justification for the change of use. Where an applicant is seeking to demonstrate that the retention of a site is not economically viable, the Council will require the applicant to provide detailed development appraisals. Consideration should be given to the viability of retaining the site:

- In its current format;
- Following selective demolition;
- Following clearance and complete redevelopment for new employment uses; and
- Following clearance and redevelopment for mixed-use development incorporating an element of employment uses within it.

Change of use will only be permitted where there is no alternative site in the local area which can accommodate the proposed development. Applicants will be expected to clearly demonstrate that the site has been actively marketed at a reasonable price that reflects the employment use for a minimum of 12 months. This policy does not apply to any of the designated town centres listed in Policy XX. Proposals to redevelop industrial sites to other uses will be supported in town centres. All development proposals must be considered against the Agent of Change principle and ensure that established noise and other nuisance-generating uses (including industrial sites) remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy 6: Town Centre First

Only in exceptional circumstances will development which generates significant footfall be acceptable outside of town centres. Developments outwith the designated town centres must provide a sequential assessment which clearly demonstrates that there are no suitable sites available in the nearby town centre(s) and that the proposal will not have an adverse impact on the vibrancy or viability of that town centre(s). This must consider all opportunities for regeneration through reuse or redevelopment of existing sites or buildings. Should the scale, type and viability of the proposal be shown not to be suitable for that town centre, then edge of town centre locations are favoured second. Other locations will only be considered where they are easily accessible by a choice of sustainable transport modes and there is an overriding economic or community benefit deriving from the development.

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.

The sequential approach set out above does not apply to proposals which meet the specified uses and developer requirements of site allocations located within designated town centres.

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 clearly demonstrate no significant adverse impacts on the vibrancy and vitality of the town centre.

To encourage a mix of housing types and tenures within town centres, the Council will consider a reduction/removal of the standard affordable housing contribution rate of 25% for developments of four or more housing units. This would only apply to developments within designated town centres. A clear justification must be provided and early engagement with the Council is necessary to agree any renegotiated affordable housing contribution rate.

Proposals for conversion of buildings to other footfall generating uses, including to residential use, in town centres will 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 development will not adversely affect the town centre's prime retail area and that the property has been marketed for its existing use at a reasonable market price/rent without success for a minimum period of 6 months. For upper floor conversions (excluding hotels) support will be given without the requirement for marketing where it can be demonstrated that the proposals would contribute towards a balanced mix of uses.

Development must be considered against the Agent of Change principle and ensure that established noise and other nuisance-generating uses (such as live music venues) remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy 7: Placemaking

The Council ambition is for all future developments to create high quality successful places to live, work and relax which are energy, infrastructure and land-take efficient, whilst protecting and enhancing the built and natural environment.

Therefore all proposals must follow a site design-led approach, which must be demonstrated by outlining which Design Tool(s) have been utilised and why; how the scheme has evolved and the changes adopted as a result of using the Design Tool and feedback from the public consultation and/or consultees (if appropriate) within the Supporting Statement submitted as part of an application.

Developments proposals of 4 or more dwellings and major non housing applications must submit a completed Placemaking Audit based on the criteria outlined in the Placemaking Audit. Conformity with 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, and thus conformity with this policy.

Policy 8: Delivering Development and Infrastructure

The Council will assess each development proposal in terms of its impact on each relevant infrastructure network* capacity. Developers will be required to demonstrate that adequate capacity to serve each proposal exists or can be created via a programmed improvement and/or by direct developer provision or funding. In doing so, developers should take account of the following.

- the Council's Delivery Programme (insert hyperlink) which sets out further detail of current programmed capacity improvements and requirements.
- the Council's Developer Contributions Supplementary Guidance (insert hyperlink) which specifies required financial contributions and standards in terms of network and facility improvements.
- settlement-specific Placemaking Priorities set out in this Plan.
- the site-specific Developer Requirements listed in this Plan for each main settlement allocation.

Developments on allocated sites and larger (4 or more homes or non residential equivalent) windfall proposals must be appropriately masterplanned. Proposals should comply with Placemaking and Placemaking Audit in this regard. Timely provision of adequate infrastructure network and community facility capacity must be demonstrated through the developer's masterplan and be secured by condition and/or legal agreement. Proposals that don't demonstrate that adequate capacity exists or can be created will not comply with this policy.

* Infrastructure network includes digital, water, green, sewerage, active travel, bus, road, rail, surface water drainage, electric vehicle charging and waste management networks. and community facility. Community facility include education, public sports, public greenspace, allotments/community growing, community meeting space, and health facilities.

Policy 9: Increasing Affordable Housing

In accordance with Highland wide Local Development Plan Policy 32, Affordable Housing and its related Developer Contributions Supplementary Guidance, the Council will expect developers to contribute towards the delivery of affordable housing within the Inner Moray Firth area.

For all proposals that create 4 or more additional residential units, the Council will expect either to negotiate a Section 75 Agreement with the landowner(s) and other interested parties, or utilise other mechanisms to provide for a contribution towards affordable housing (as defined in Chapter 4 of the Guidance), such contribution being generally no less than 25% and within the City of Inverness Settlement Development Area (excepting land within the defined City Centre) no less than 35%. Negotiations will be subject to market and site conditions, and the final percentage contribution will reflect this, taking into account the financial viability of the proposal and other financial obligations.

For allocated sites with a total capacity of 50 or more homes and where public subsidy is available, the Council will expect an application to include details of servicing and phasing arrangements that prioritise the delivery of affordable units ahead of or if necessary then in parallel with market units. The Council will consider the early gifted transfer of a later phase landholding as one way of achieving this aim provided it can be serviced at a reasonable cost and in a timeous manner. Exceptions will only be permitted where the developer can demonstrate that giving priority to affordable units will unduly affect the overall viability of the site or compromise the aim of tenure diversity within a large part of it.

Subject to this Plan's Placemaking Policy and within its Main Settlements, the Council will support affordable housing development at a higher net housing density than that existing on or adjoining a proposal site.

Policy 10: Self and Custom Build Housing

To accommodate demand and grow support for self and custom build home, whilst offering flexibility in the housing market within the urban area, the provision of at least 5% of the total residential units must be made available, for sale as serviced plots on all sites delivering 100 or more housing units.

To offer flexibility in the delivery of this policy, the site developer can market all or some of the serviced plots as "custom build sites" requiring the purchaser to use the main developer for the design and build phase. Alternatively, all serviced plots can be sold as a single entity to a formally enacted co-housing or community-led housing scheme (with the agreement of the Council, as planning authority) or sold off individually to self-builders.

The delivery of serviced plots will be controlled by the following means:

- 1. The site owner/developer can attach appropriate conditions regarding the finish and layout of individual plots or establish a Design Codes to cover all the serviced plots, in agreement with the Planning Authority. Any conditions or Design Codes should not render the plots unfeasible or cost prohibitive to develop and prevent innovative and environmentally friendly designs or MMC being utilised.
- 2. All plots should be marketed through recognised channels for a period of 12 consecutive calendar months and at the prevailing market value. If open market plot(s) remain unsold after the initial 12 months, they will revert to the site developer for their own build out. A marketing and pricing strategy should be submitted as part of the planning application submission for approval.
- 3. The site planning approval will include conditions requiring the serviced plots to be completed within 3 years of a self-builder purchasing a plot and prevent the self-builder residing on the site in temporary accommodation during the build.
- 4. Where the number of serviced plots exceeds 5 units, the location and phasing of the plots should be broken up into smaller groups and offered for sale at differing times, prior agreed with the Council, in accordance with the development overall phasing strategy.
- 5. The maximum number of serviced plots to be provided on any site required by this policy, is restricted to 10 plots to avoid over-supply within any development or area.

This policy is not applicable in the redevelopment of upper-floor accommodation within urban areas.

Should this policy render any site unviable, the developer can submit an open book viability assessment as part of the planning application submission. Where the viability assessment following independent review by the Council (the cost of which is to be borne by the applicant), confirms the provision of serviced plots in compliance with this policy is not viable, the number of plots required can be varied accordingly. Where exemptions are justified on viability grounds, the minimum number of plots necessary will be exempted from the requirements.

Policy 11: Growing Settlements

A development proposal that is contained within, rounds off or consolidates a Growing Settlement listed in Tier 5 of Settlement Hierarchy will be assessed against the extent to which it:

- takes account of the Placemaking Priorities identified for the individual Growing Settlement;
- is likely to help sustain, enhance or add to facilities with proposals being located within active travel distance of any facility present;
- is 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.

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

Policy 12: Accessible and Adaptable Homes

In order to provide resource efficiencies and allow for residents to adapt and live in their homes all their life, new housing must be designed and constructed in a way that enables them to be adapted to meet the changing needs of their occupants over their lifetime.

The Council therefore requires, 5% of dwellings to have a "wheelchair liveable" ground floor on sites of 50 or more residential units. If evidence at the time of a planning application indicates a low level of need then this element of the policy will be applied flexibly.

The Council will only consider exemptions to these requirements where the applicant can provide evidence to robustly demonstrate that any of the following specific circumstances apply:

- 1. It is not practically achievable given the physical characteristics of the site;
- 2. It would significantly harm the financial viability of the scheme;
- 3. Site specific factors mean that step-free access to the dwelling cannot be achieved;
- 4. The dwellings are located on the first floor or above of a non-lift serviced multi-storey Development.

In terms of the requirements for "wheelchair liveable" ground floors the following criteria from the <u>Housing for</u> Varying Needs Guidance

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

- 1. Access ramps should have a minimum width of 1200mm and the entrance must be step free with a level platform of at least 1500 x 1500mm at the accessible entrance door, clear of any door swing. (7.5.6 and 7.5.7).
- 2. A secure storage space of at least 1200 x 800mm for electrically powered scooters or outdoor chairs storage, equipped with a power socket. This may be external as part of a garage, carport or extended porch, or it may be internal as part of a utility area or store (7.14).
- 3. Ground floor hallways to be at least 1200mm wide, but a width of 1000mm is adequate for lengths of up to 900mm, provided there is no door opening at a right angle to the direction of the passage (10.2.3).
- 4. Ground floor doors to the principle rooms to have a clear opening width of 870mm, with door ironmongery at a height between 750mm and 1050mm from the floor. 10.5.7 and 10.5.9).
- 5. A ground floor bedroom with built-in clothes hanging space and shelved clothes storage. The space should have a minimum clear depth of 600mm and a hanging rail that can be set at a height of 1400-1500mm from the floor (11.4.8).
- 6. Ground floor bathroom provided which permits for someone in a wheelchair to turn through 180degrees, i.e. a circular area of 1500mm diameter (see diagram at 2.5.1), without being impeded by the door (14.9.2). The position of the WC should allow frontal or side transfer with a clear space of at least 750mm on one side (14.11.1) and wash basin should be positioned with its centre line at least 500mm from any wall (14.12.1).
- 7. Living room windows, and bedroom windows where privacy is not affected, should have a sill height no greater than 600mm from the floor, which allows a seated person to see the view outside. Glazing bars or transoms should not be positioned between 600mm and 1500mm from floor level to give an unobstructed view (16.2.1).

Should this policy render any site unviable, the developer can submit an open book viability assessment as part of the planning application submission. Where the viability assessment following independent review by the Council (the cost of which is to be borne by the applicant), confirms the provision of serviced plots in compliance with this policy is not viable, the number of plots required can be varied accordingly. Where exemptions are justified on viability or practicality grounds, the minimum number of units necessary will be exempted from the requirements.

Policy 13: Transport

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 travel options for people using the development, than travelling by private car. The methodology that applicants must follow to demonstrate compliance with this policy requirement is set out in Appendix X.

Travel Plans must support any development proposal of 10 or more homes or more than 500 m² retail, office, business or industrial development. This must demonstrate how the proposal will support a transition to sustainable transport. Any other development that the Council considers likely to have significant trip-generating impacts will also require to be supported by a Travel Plan. The Travel Plan must include the following information to comply with this policy:

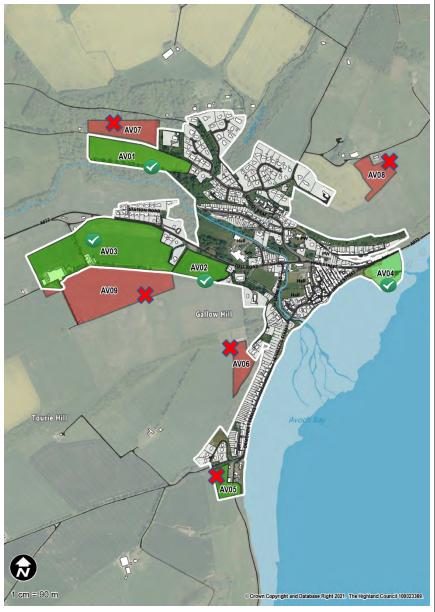
- a. Clear and measurable targets and objectives to deliver sustainable transport for that development.
- b. What range of measures will be implemented to mitigate the impacts of development that will deliver sustainable transport.
- c. What monitoring and reporting framework will be used to quantify the effectiveness of measures implemented, and when this will take place and be reported to the Council.
- 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 measures will be monitored and reported to the Council.

Developer contributions will be secured to mitigate the impacts of development to support the transition to sustainable transport. These contributions are set out in the Council's Delivery Programme, and are referred to in the Developer Requirements for sites and in the Placemaking Priorities for settlements:

- f. 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.
- g. 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.

APPENDIX 2: BLACK ISLE COMMITTEE:

SETTLEMENTS AVOCH



Summary of Issues Raised in Comments (30 comments)

- Objections to AV05 because: inadequate road capacity; road safety without pavement; HGV traffic; built heritage impact; visitor impacts; no pavement; will reduce active travel (AT); better connected site at Muiralehouse; adverse impact on Placemaking; Safer Routes to School; poor public transport connectivity for employees; physical impact on weak bridge; physical traffic management measures impracticable; impact on Ormonde Hill walk; and, noise pollution.
- Concern that development at AV04 will have adverse built heritage impact.
- Objections to AV06-AV09 because: loss of greenspace; amenity; adverse visual/landscape impacts; inadequate road capacity across Black Isle; and, will only increase commuting.
- Objections to AV03 because: excessive, sprawling and outwith AT range of village facilities.
- Landowner agent support for AV01, AV05 no reasons stated.
- Avoch should be Tier 4 not 3 and Black Isle kept rural, lack of local jobs, poor road network, lack of school capacity.
- Much stronger reference to Avoch-Munlochy AT link needed including consideration of CPO/Path Order.
- Avoch & Killen Community Council object to AV01 because of road capacity, school capacity, affordability & drainage. AV03 too big, not sustainable and will lead to loss of greenspace.
 Object to AV05 for same reasons as above. Wish to keep and expand school in situ. Developer contributions should be used to upgrade existing play facilities. List greenspaces for protection.
- NatureScot suggest careful mitigation required for any dredging at AV04 to safeguard nature interests.
- Landowner agent support for AV03 deliverable, serviceable and any adverse impacts can be mitigated. Proposal for 130 homes, business and community. Also support AV05 (no reasons stated).

Recommendations & Reasons

- The proposed allocations are supported because they benefit from longstanding, in principle, support for development. The harbour would benefit from improvement to support existing activity and land at Muiralehouse is the least constrained option to support additional local employment, community and other facilities. Site AV01 benefits from a previous planning permission and a current allocation and application. Site AV02 is under construction.
- Other sites are not supported because they have a combination of visual, landscape and road capacity constraints and/or are not required to meet forecast need/demand.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

Placemaking Priorities

- To limit new development to existing planning permissions and land allocations.
- To add extra primary school capacity.
- To improve linkages between new development west of the village and village centre facilities.
- To protect the character of Avoch's central conservation area and its wooded margins.
- To seek developer contributions and other funding towards the provision of a strategic active travel link between Munlochy and Avoch.

Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------|---|-------------------------------------|
| Rosehaugh East Drive | Housing | 30 |
| Memorial Field | Housing | 46 |
| Muiralehouse | Housing, Business, Community, Industry | 80 |
| Harbour | Business / Tourism (harbour related only) | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.





Summary of Issues Raised in Comments (18 comments)

- Residents disagree with text's negative outlook for town. Should reference increased population, homeworking, good range of local facilities and tourist attractors, and employment prospects at Nigg.
- Affordable housing needed to retain and attract young people and families. Desire for control on holiday/second homes.
- Landowner and other support for CMO3
 especially for affordable housing (AH) and/or self
 build, other development already breached
 raised beach, close to centre, home working
 means less commuting, adequate sewerage
 capacity, offer of publicly accessible greenspace.
- Support for CM02 but should be bigger to meet known demand, concerns about landfill contaminated use, Business (B) use on balance of site.
- Plan should reference vital role of Nigg ferry as a sustainable tourism resource linking to NC500 for Cromarty & Black Isle.
- Support for CM01 but design crucial. Want less intensive development because road access can't be improved without adverse impact.
- NatureScot seeks safeguarded and enhanced Green Networks (GNs) to connect the parts of the town.
- Cromarty & District Community Council oppose CM03, support CM01 for AH & community use, CM02 should be for campervans and/or AH only. Seek better public transport, facilities, ferry service and infrastructure capacity.
 Suggest redrawing school catchments. Victoria Park & Links should be greenspaces.
- Owner requests CM01 extended to include Sandilands Barn for B and Community use.
- Support for improved ferry, bus, Active Travel (AT), EV charging, growing spaces links/facilities.

Recommendations & Reasons

- Land at Sandilands is the best candidate for expansion because of its centrality and visual containment. However, it has road access limitations an effective solution to which requires the reconfiguration of the Victoria Hall recreational facilities. There is local opposition to such reconfiguration and it would impose additional development costs. The site should be extended to include the Barn but this isn't a practicable, principal, vehicular access route. To preserve the prospects of at least one effective housing site, land south of the manse is also proposed. The landowner has shown a willingness to commit to structural landscaping, AT improvements via the Paye and plots for self build by local people. The site is peripheral to the community and has landscape sensitivities but in the Council's view, is the next best, effective option. Otherwise, only smaller scale infill development below the raised beach is likely to be acceptable including land for visitor management facilities at Bayview Crescent.
- Amend preamble text to reference Nigg Ferry as sustainable tourism resource and journey to work plus homeworking.
- Enhancement of GNs to improve internal connectivity of town.
- Add contamination assessment for development of CM02.
- Extend Settlement Development Area to enclose CM03 and town-side land.

Placemaking Priorities

- To support growth via suitable infill development below the raised beach.
- To control the scale of growth within the limits of sewerage capacity.
- To encourage the sensitively designed development of the central Sandilands site or if it continues to prove ineffective then land south of the manse.
- To protect and enhance the town's heritage assets notably the conservation area, links and wooded margins. These wooded green networks should accommodate active travel routes to enhance the internal connectivity of the town.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|------------------|-----------------------------|-------------------------------------|
| Sandilands | Housing, Community Business | 33 |
| Bayview Crescent | Community Business | n/a |
| South of Manse | Housing, Community Business | 25 |



Summary of Issues Raised in Comments (13 comments)

- Support for Community use on CU03 toilets, seating different views on Business/Housing.
- Some disagreement that public transport viability be used as a factor in deciding Culbokie's place in the settlement hierarchy.
- Opposition to CU04 inadequate infrastructure capacity, poor public transport connectivity, traffic congestion, too far from village core.
- One objection to more Active Travel (AT) links at the expense of driver journey times.
- Opposition to CU05 loss of green centre of village.
- Support for CU05 but only for Business (B)/Community.
- Concern about misuse of Culbokie Wood greenspace.
- Ferintosh Community Council (CC) and others request a more positive description of village —
 'consolidation', not dormitory, not poor microclimate, more AT and electric vehicle (EV) investment and measures to reduce need to travel, more housing tenure diversity, Local Place Plan.
- Two views that Culbokie is appropriate for significant but central growth to the forest edge because it has good infrastructure capacity, home working & EV are the new norm and could accommodate self-build by local families.
- Ferintosh CC support Culbokie as Tier 4 settlement, support CU01 & CU02, CU03 for Community use only, object to CU04 & draw Settlement Development Area (SDA) in, object to CU05, balance of CU7 for greenspace, seek more (listed) protected greenspaces.
- Support CU03 for B use.
- Neighbour desire to identify land between 13 and 15 Rowan Drive as greenspace.
- NatureScot seek enhancement of local greenspaces and Green Networks (GNs).
- Landowners seek retention of CU04 and its expansion for Housing and B use because housebuilder interest, quantitative need, close to facilities and will help reverse population decline.

Recommendations & Reasons

- Only support completion of already permitted sites, a brownfield redevelopment opportunity and completion of established infill sites. Sites CU01 and CU02 benefit from planning permission and provide for a mix of uses in a location as close as possible to the centre of the village. Land adjoining the old primary school is previously developed and underutilised. Land at and south of Fowler's Croft is part developed and part serviced.
- Additional / amended
 Placemaking Priorities to:
 reference the need for
 improved AT connections
 through the village, to and
 across the A9 and to local
 greenspaces; to a community
 transport scheme; to support
 enhancements of local GNs &
 greenspaces; and a more
 positive description of the
 village. All to respond to
 comments received.
- Draw in SDA to exclude CU04 site because availability issues, peripheral and better adequate alternatives. Draw in SDA to exclude open field to south of Carn Mor.

Placemaking Priorities

- To consolidate the village by completion of infill development sites.
- To promote and seek contributions towards better active travel connectivity within the village and to the A9 and for a community transport scheme.
- To limit the scale of new development in line with the village's limited infrastructure capacity.
- To promote a mix of housing, business and community sites in central locations.
- To retain and enhance the greenspace and green networks in and around the village.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|------------------------|------------------------------|-------------------------------------|
| North of Cairns | Housing | 33 |
| North of Schoolcroft | Housing | 20 |
| South of Village Store | Housing, Community, Business | 6 |
| East of Former Primary | Community, Business | n/a |
| School | | |

FORTROSE & ROSEMARKIE



Summary of Issues Raised in Comments (11 comments)

- Opposition to any further significant development because of a lack of infrastructure capacity (notably road capacity)
- Coalescence of Fortrose & Rosemarkie should be resisted.
- Developer support for new primary school on Ness Road site.
- Request for more traffic management, seasonal overflow parking and enforcement.
- Retail operator and developer agent request for larger store on Ness Road site to provide better local choice, reduce leakage and more local jobs. They argue Ness Gap alternative site unsuitable as less likely to attract passing trade and servicing more problematic.
- Objection to any Plan reference to development potential at Raddery.
- Disagreement with the Plan assumption that improving public transport to the eastern Black Isle is not cost effective.
- Support for Placemaking Priorities (PPs) as written.
- Landowner support for FR02 effective, planning permission, legal agreement and serviceable.
- NatureScot seeks better PPs reference to Green Networks (GNs) as biodiversity/Active Travel (AT) gains.

Recommendations & Reasons

- Only allocate previously earmarked and/or permitted development sites. Land at Ness Gap and Greenside Farm benefits from planning permission and/or allocation in the current approved development plan. The Ness Gap land not already earmarked for housing development could be suitable for either community or relocated retail use within the identified Settlement Development Area (SDA).
- There is no current financial commitment to extend the cemetery so the land should not be specifically earmarked for this purpose. However it should be retained within the SDA.
- The scale of existing and proposed development on the eastern Black Isle is unlikely to support a commercial public transport service.
- No Plan reference to Raddery is proposed.
- Add PPs to reference the biodiversity and AT advantages of GNs.

Placemaking Priorities

- To consolidate rather than further expand the settlements.
- To secure local infrastructure improvements in parallel with this lower growth scenario particularly through developer funded traffic management measures.
- To complete allocated and permitted development sites at Ness Gap and Greenside Farm.
- To safeguard the setting, heritage features and distinct identities of the two principal settlements.
- To safeguard and secure enhancements to local Green Networks to improve active travel and habitat connectivity.

Greenspaces Map

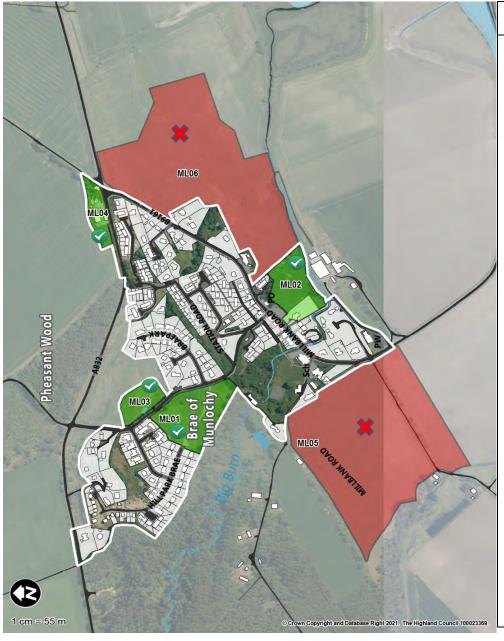
We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------|-------------------|-------------------------------------|
| Greenside Farm | Housing | 50 |
| Ness Gap | Housing | 12 |

MUNLOCHY



Summary of Issues Raised in Comments (16 comments)

- Opposition to ML05 and ML06 because of inadequate road capacity.
- Support for ML01 & ML02 planning permissions issued.
- Support for ML03 no reasons stated.
- Disagreement with public transport viability as a criterion for settlement expansion decisions; support for smaller scale, infill growth because better matched to limited infrastructure capacity.
- NatureScot supports Active Travel (AT) link between Avoch
 Munlochy as Green Network (GN).
- Landowner supports development of sites ML01-06 because 30 units on ML06 effective, impacts can be mitigated and offer of AT network. Content with school on ML03 but if not then self build housing preferred.
- Knockbain Community
 Council object to any more housing development because of inadequate road and other network capacities but support community uses, small shop, greenspaces, car parking, and better public transport.
- Support for ML03 to be left for primary school use only.
- Support for AT link between Church and Bay through ML02.

Recommendations & Reasons

- Constrain future development potential to the completion of existing allocated and permitted sites. The recommended sites benefit from allocation in the approved development plan and/or a planning permission. They are also relatively unconstrained for example 3 of the 4 sites could utilise existing road and foul sewer access/connection points. Redevelopment of the site north of the A832 should lead to a net environmental improvement.
- Add references to safeguard and enhance GN and AT connectivity.
- There is no quantitative need for the additional suggested sites and their scale would compromise local network and facility capacities.
- ML03 may not be required for a relocated school so it should be reserved for a broader range of community uses.

- To consolidate not expand the village.
- To avoid the need to invest in new infrastructure such as the primary school by limiting growth to a level that can be accommodated by existing facilities.
- To support the completion of development at already earmarked and permitted sites.
- To seek developer contributions and other funding towards the provision of an active travel link between Munlochy and Avoch.
- To safeguard and enhance local green networks in particular the wooded watercourses that add character to the village.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------------|--------------------------------------|-------------------------------------|
| Hillpark Brae | Housing | 32 |
| Land South of the Post Office | Housing, Community, Business, Retail | 15 |
| Station Brae | Community | n/a |
| Land North of the A832 | Business | n/a |

NORTH KESSOCK



Summary of Issues Raised in Comments (30 comments)

- Objections to NK01 because of adverse impact on greenspace, trees (trees secured by permission), core path views, natural heritage, prime farmland, lack of need/demand, no local employment, road safety, of village character, legal agreement prevents other development until golf course developed, road capacity, privacy / amenity, property prices, construction disturbance, gas pipeline proximity, drainage/flooding, sewerage capacity, pond.
- Objections to NK02 because ugly, loss of village character, unneeded because of lower commuting, better alternative sites (Tore, Inverness, existing A9 service areas), additional traffic and pollution, litter, anti-social behaviour, road safety, blocks cycle route, gas pipeline, land north of A9 impracticable because of gradient and poor visibility, too small for meaningful modal shift, offer of bigger, developer funded site at Tore which will intercept more journeys.
- Objections to NK05 because loss of prime farmland, core path views, natural heritage, infrastructure capacity, lack of need/demand and local jobs, road safety, legal agreement prevents other development until golf course developed, loss of privacy / amenity, property depreciation, construction phase impacts, impact on pond, drainage/flooding, sewerage capacity.
- Objections to NK04 because loss of farmland, core path views, natural heritage.
- Lack of local public consultation on proposals
- Support for NK02 (esp for electric vehicles with charging or retail units), NK03 (but not for caravans and incorporate path) & generally for retail & sheltered housing.
- Any new housing should be low carbon.
- Extend 50mph limit to North Kessock A9 junction.
- NatureScot wants enhanced Green Networks (GNs) reference, woodland issue with NK02
- Landowner wants 150 houses and other mixed uses on bigger NK01 because site effective, and legal agreement can be modified.

Recommendations & Reasons

- A limited development would be acceptable on land to the west of the village. Because it lies at the northern gateway to the City of Inverness, North Kessock could also play a strategic role in managing travel and visitor impacts by accommodating a Park and Ride facility and a campervan servicing site. Land at Bellfield Farm (East) benefits from a previous development allocation and is unlikely to be feasible for business/commercial development in connection with a golf course. It may still support commercial or community use together with limited housing development. Land adjoining the A9 junction is the optimum location for an interceptor park and choose/ride site to encourage changes to more sustainable travel modes. Similarly, the existing A9 northbound car park and adjoining land is underutilised and could better manage the impacts of campervan visitor demand.
- Further development allocations are not justified in infrastructure, facility and environmental capacity terms.
- Woodland and other site-specific constraints to the allocated sites can be mitigated by implementation of defined developer requirements for each site.
- Add reference to safeguard and enhance green network and active travel connectivity.

- Landowner wants petrol filling station, retail and business on NK02 because it believes there are better Park & Ride sites.
- Landowner wants 100 houses and other mixed uses on NK05 because it is effective, there is a quantitative need and constraints can be mitigated.
- Knockbain Community Council supports NK01 for specialist/affordable housing, business and retail if infrastructure capacity improved. Opposes NK02 because of resident objections. Objection to NK03 unless amenity, pollution, management and boundary issues addressed. Objection to NK05 for reasons expressed by residents. Desire outdoor leisure facilities for tourists/locals.
- One view that North Kessock should be dropped 2 places in the Settlement Hierarchy because reached it has reached its physical limits and has no natural infill sites

- To support limited, mixed use expansion to the west of the settlement.
- To secure infrastructure improvements that play a strategic role in managing travel and visitor impacts.
- To presume against infill development on greenspaces within the village where they offer amenity, recreational and/or nature conservation value.
- To safeguard and enhance green network and active travel connectivity.

| Site Name Acceptable Use(s) | | Indicative 10 Year Housing Capacity |
|-----------------------------|--|-------------------------------------|
| Bellfield Farm | Housing, Community, Business | 80 |
| Land Adjoining A9 Junction | Community (Park & Ride/Choose), Retail | n/a |
| A9 Northbound Car Park | Business | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.





Summary of Issues Raised in Comments (8 comments)

- Landowner support for retention and development of TR01.
- Support for Park & Ride (P&R) site at Tore not at North Kessock because former will capture more people and decrease car miles.
- NatureScot seek reference to need to protect and enhance local blue and green networks. Also woodland retention and setback requirements for TR01 and TR02.
- Developer seeks development of TR04 for 200 bay P&R site, new primary school, retail, community uses, business development, and industry, new trunk road junction plus 1,000 homes because it will provide local employment opportunities and therefore allow sustainable economic growth, new infrastructure capacity can be created by the developer, P&R safer and more effective at Tore, marketable and strategic location, adopted plan allocation at Tore, Active Travel (AT) including footbridge improvements will be developer funded, all other constraints can be mitigated, development effective and viable.

Recommendations & Reasons

- Only promote very limited infill
 development at Tore because of the Plan's
 proposed spatial strategy of directing
 significant development to sustainable and
 viable locations. Land at Woodneuk
 benefits from a recent planning
 permission, would infill a cluster of existing
 development and is close to the primary
 school. Tore is a competitive location for
 industrial and storage uses and existing
 enterprises may require to be expanded.
 Treed land north of the grain mill has
 potential to absorb expansion of existing
 operations including larger scale buildings
 into the local landscape.
- There is no quantitative requirement for the scale of expansion proposed and the necessary upgrading of infrastructure and community facility capacities is very likely to be unviable.
- Add reference to need to safeguard and enhance local green network and active travel connectivity.
- Other comments can be addressed by sitespecific developer requirements.

- To only support limited infill development at Tore.
- To control that expansion to the limited capacity of local primary school and sewerage facilities.
- To define a development envelope that supports the infilling of the clusters of buildings that make up the settlement of Tore.
- To safeguard and enhance local green network and active travel connectivity particularly across the major roads that currently inhibit movement.

Greenspaces Map

There are no greenspaces proposed for the Tore settlement.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|------------------------------|--------------------|-------------------------------------|
| By Woodneuk | Housing | 14 |
| Land North of the Grain Mill | Industry, Business | n/a |

APPENDIX 2: CITY OF INVERNESS AREA COMMITTEE: SETTLEMENTS

MAIN SETTLEMENTS: ARDERSIER



Summary of Issues Raised in Comments (2 comments)

- NatureScot support the plan to improve transport connections including for nonmotorised users and want to see opportunities to tackle biodiversity loss and climate change for the renovation and redevelopment of vacant and derelict land.
- Respondent agrees with Placemaking Priority for better active travel links with Inverness.

Recommendations & Reasons

The recommended response is to follow the MIR preferences. This includes the allocation of the land south of Nairn Road as the site has permission for 117 homes and is currently being built out. The other site to be allocated is at Station Road which benefits from being centrally located and brownfield. Land previously allocated for an expansion to the industrial estate is not being carried forward due to availability issues. The main developable areas at the existing Milton on Connage site have since been used for agricultural proposes. The two sites to the north of the village are not being taken forward as they are both at risk of flooding.

- Improve sustainable transport connection to key employment destinations, particularly Inverness Airport, Nairn and Inverness, and delivery of the A96 Coastal Trail.
- Encourage the sensitive renovation and redevelopment of vacant and derelict sites within the village.
- Improve traffic management on the High Street. This should include measures which better manage the implications of traffic generated by new development in the area (particularly related to any conversion of Fort George), assist with the servicing of properties and for people to safely cross the public roads on required desire lines.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------|--------------------------------------|-------------------------------------|
| South of Nairn Road | Housing | 80 |
| West of Station Road | Housing, Business, Community, Retail | 10 |

BEAULY



Summary of Issues Raised in Comments (16 comments)

- Support for removal of BE07 & BE08.
- Request for Council to fund key Active Travel (AT) routes and use CPO powers especially Beauly-Lovat Bridge & Dunballoch-Cabrich sections and Muir of Ord to Conon Bridge.
- Safeguard shinty pitch and amenity of BE06
- Landowners supports allocation of BE01 for Housing, BE02 for Business & Housing and BE08(S) but won't release BE04,BE07 & BE08(N) for agricultural tenancy reasons.
- Beauly Community Council want BE04 & BE05 deleted and Care Home use on BE01-3. Request greater control on development towards Muir of Ord.
- NatureScot suggest green networks along burns and loop road.
- Network Rail won't fund rail halt expansion.
- Objection to BE04 because: better alternative sites for these uses; breach of natural settlement boundary; and, loss of amenity.

Recommendations & Reasons

- The recommended to be confirmed sites will maintain the compact settlement pattern of Beauly and respects its constraints. Other things being equal, compact mixed use development will encourage active travel because there will be the opportunity to walk or cycle to local employment and local facilities. A new primary school is supported in a central location. Business development is directed as close as possible to the town centre and passing trade to bolster footfall. The allotments at Fraser Street provide a community growing space but this could be provided elsewhere in Beauly. At least part of the allotments site, being flat and central to amenities, could be suited to housing accommodation specifically adapted for the elderly whether that is private flatted or institutional accommodation. New mainstream housing development is directed to more peripheral areas because of the limited capacity of Croyard Road and farm tenancy issues on land adjoining.
- Strategic AT links will be given greater support within other sections of the Proposed Plan.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

- To expand the town respecting the physical limits of the railway line and River Beauly flood plain.
- To complete a peripheral loop road to ease issues created by the outdated central road network.
- To safeguard, enhance and create green networks especially along existing watercourses and adjoining the loop road.
- To provide land to encourage a more self-contained community with local employment opportunities, more housing specifically adapted for the elderly, and better community facilities.
- To protect and enhance the town's historic and vibrant centre.
- To seek developer contributions and other funding towards the provision of active travel links within Beauly and to strategic links to Muir of Ord and Kirkhill.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-----------------------------------|--|-------------------------------------|
| Beauly North | Housing, Community | 120 |
| East Wellhouse | Community (including Care Home), Business | n/a |
| North East of Fire Station | Community (including Care Home), Business | n/a |
| West of Cnoc na Rath | Housing, Community (incl. School, Allotments), Business | 50 |
| Fraser Street Allotments | Housing (for Ageing Population Only), Community (incl. Allotments, Care Home) | 20 |
| Primary School and Playing Fields | Community | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.





Summary of Issues Raised in Comments (3 comments)

- Croy and Culloden Moor Community Council seek clarification on: 1) figure of 10% population increase in 10 years as they believe it is higher; 2) Scotia homes meeting housing needs for foreseeable future. Also the noted transport concerns were highlighted to Council prior to Scotia development.
- NatureScot highlight opportunities to create new green networks and connect with the nearby Ancient Inventory Woodland which could provide active travel measures including along the Croy Road to Tornagrain.
- Landowner objects to deallocation of CR03 due to: upfront onsite infrastructure investment associated with development of CR01; phasing was to ensure market demand; the site is effective; landowner opted for Scotia to ensure a better quality end product; both phased masterplanned including site wide design strategy; increased access to facilities (new shop and Tornagrain) and potential for other commercial uses; and, less need to travel to work and enhanced connections (e.g. Dalcross Rail).

Recommendations & Reasons

- The population change figure in the MIR was based on the latest mid-year estimate (2017) against the 2011 census figure. The figure is likely to have increased since then as more housing development is complete.
- An additional Placemaking Priority will be included to promote multi-use green networks, particularly the connection of woodland with active travel provision including Croy Road to Tornagrain.
- CR01 will continue to be allocated as it is under construction. Given that CR01 was designed as Phase 1 and a level of infrastructure was provided to accommodate further development, we propose to allocate CR03 for a maximum of 50 units. Opportunity exists to create a local enterprise/co-working unit within CR03 to allow residents to work closer to home.

Placemaking Priorities

- Improve the transport network, particularly around the junction of the B9091 and the B9006 and along Croy Road to Tornagrain.
- Ensure that the new primary school at Tornagrain and secondary school at Inverness East are delivered at an appropriate time to avoid undue pressure on the existing schools.
- Improve active travel connections to key destinations, particularly the delivery of the A96 Landward Trail and North South Links routes.
- Preserve existing green networks, particularly the woodland between Cory and Tornagrain, and enhance their role as active travel routes and biodiversity sanctuaries.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|---------------------------------|------------------------------|-------------------------------------|
| West of Primary School | Housing | 50 |
| North West of Primary School | Housing, Community, Business | 50 |

DORES



Summary of Issues Raised in Comments (4 comments)

Dores and Essich Community Council (DECC):

- Support DO01 as it is effective within the short term.
 DECC object to DO02 as it is considered ribbon development and have concerns over its availability.
- Request that DO03 and DO05 are merged and allocated for housing and community woodland due to Scottish Water commitment to upgrade water supply, willing landowner and community support. Both sites are required to ensure viability. Indicative site layout submitted in support.
- Support retention of the Community allocation DO04 but recognise no specific proposals at present.
- Request a new site to the west of the B862 be allocated for employment uses south of the Saw Mill as there are no other available sites in Dores.
- Raise no objection to Dores becoming a Growing Settlement but wish to remain informed of decision.
- NatureScot support recommendation not to allocate DO03 and DO05 due to protected woodland on the site.
 Recommend a developer requirement be applied to DO04 in relation to the GCR designation.
- Landowner of DO03 and DO05 supports allocation as a single housing site because: the housing projections in the MIR are too low; it will satisfy affordable and self build demand; the sites are effective taken as a whole noting that the Scottish Water will require part of the southern site; developer interest in the form of an affordable housing provider; associated with improved access to the village hall; Dores is a highly sustainable location; the allocation will avoid ad-hoc and unplanned housing in the countryside; and, compensatory planting will take place on other land in the same ownership.

- **Recommendations & Reasons**
- Retain DO01 and DO03 development sites (see detail in table below) because both have developer interest (affordable housing providers) and can deliver wider benefits for the community. DO01 is centrally located and is a logical expansion site. DO03 is associated with Scottish Water infrastructure upgrade works and an access upgrade to the village hall. However, being a wooded site with topographical constraints and slightly more detached from the settlement, there are deliverability concerns.
- Do not take the following sites forward:

DO02 – due to potential visual impact and better alternative sites.

DO04 – No specific proposals for development and potential visual impact.

DO05 – Detached from settlement, suggested active travel connections not practical, steep wooded site which could have a wider visual impact.

- Protect and enhance the playpark and grass sports pitch in the centre of the village.
- Increase car parking facilities to serve both the local community and visitors during peak times.
- Work with Scottish Water to upgrade the water supply capacity.

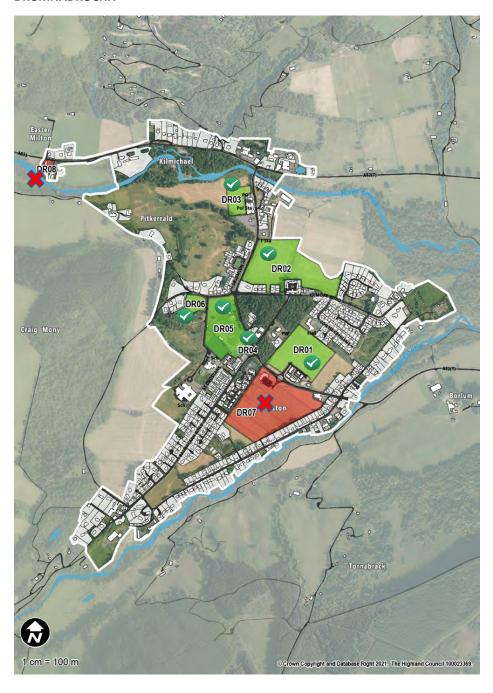
Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--------------------------|---------------------------------------|-------------------------------------|
| Land South of Dores Hall | Housing | 10 |
| Land South of Church | Housing, Community, Business, Tourism | 25 |

DRUMNADROCHIT



Summary of Issues Raised in Comments (19 comments)

- Opposition to any multiple, new housing developments (especially DR04,07,08) because of lack of infrastructure and transport capacity.
- View that developer of DR02 should follow Placemaking Audit and engage with Glenurquhart Childcare Centre (GUCC).
- Landowner of DR07
 seeks phased mixed use development
 including some self build housing
 because the site is central and
 serviceable.
- GUCC seek community uses on part of DR07.
- NatureScot seeks reference to enhanced Green Networks (GNs).
- Glenurquhart Community Council (GCC) seeks Local Place Plan, infrastructure investment, supports DR03,5,6 seeks green wedge for DR07, and opposes DR08 because of flooding.

Recommendations & Reasons

- That the 'legacy' allocations at Drum Farm and adjoining the new Co-op store should be completed but that no new expansion areas should be promoted. The two large central sites represent previous, in principle, development commitments. DR01 is part permitted and part constructed. Land at Drum Farm can also help consolidate the settlement in a central location where, other things being equal, a mix of uses can promote more sustainable travel to local facilities and employment. Land to the rear of the post office will be better protected from flooding following completion of the programmed flood scheme and is also in an optimum central location close to other commercial facilities and the principal public car park. Other than these sites, expansion of shinty facilities would most sensibly be made adjoining the existing pitch and underutilised land closer to the high and primary schools may have potential for complementary education or other community use.
- Better referencing to safeguard and enhance green network and active travel connectivity is also recommended to address issues raised.

- To consolidate the village by supporting the completion of its central development sites.
- To secure an improved range, quality and location of commercial and community facilities.
- To improve active travel accessibility to these more centralised facilities.
- To preserve the greenspaces and green corridors that permeate through the settlement and enhance their role as active travel routes.

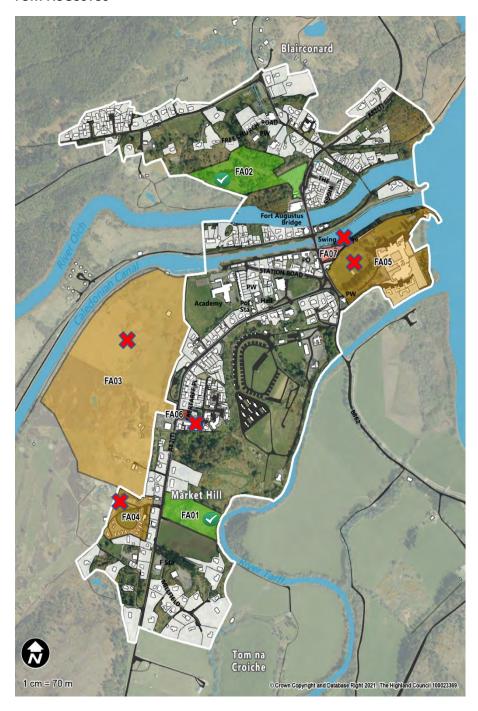
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------|--------------------------------------|-------------------------------------|
| Former A82 Retail Units | Housing | 10 |
| Land Adjoining Supermarket | Housing, Business, Community, Retail | 43 |
| Drum Farm | Housing, Business, Community, Retail | 93 |
| Land West of Post Office | Community, Business, Retail | n/a |
| Shinty Pitch and Adjoining | Community | n/a |
| Land | | |
| Schools Junction | Community | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



FORT AUGUSTUS



Summary of Issues Raised in Comments (3 comments)

- Fort Augustus and Glenmoriston Community Council supports small scale c. 10 units private/affordable housing developments – suggests need for campervan parking area with waste disposal facilities.
- Owner supports FA02 for tourism development and visitor management facilities.
- NatureScot requests better Green Network (GN) referencing and woodland safeguard for trees on FA02.

Recommendations & Reasons

- Consolidate rather than seek to promote expansion of Fort Augustus – i.e. a widely drawn Settlement Development Area that will support smaller infill development sites. The fragmented pattern of landownership within the village and other constraints limit the land that is available and viable for significant development. Land south of the Old Convent is already part developed and could be extended. Land within and adjoining the village car park is in the most sustainable location and could be reconfigured to allow more and better laid out car parking plus enabling mixed use development.
- Addition of a developer requirement to site FA02 to ensure that development fits around retained semi natural origin woodland.
- Placemaking priority references to need to safeguard and enhance Green Networks and internal active travel network connectivity.

- To support smaller scale infill expansion where land ownership and other constraints allow.
- To complete water supply improvements.
- To encourage comprehensively serviced mixed use development close to the village centre and south of the Old Convent.
- To avoid fluvial flood risk issues and mitigate the severance of active travel movement caused by the transport corridors.
- To safeguard and enhance local Green Networks.

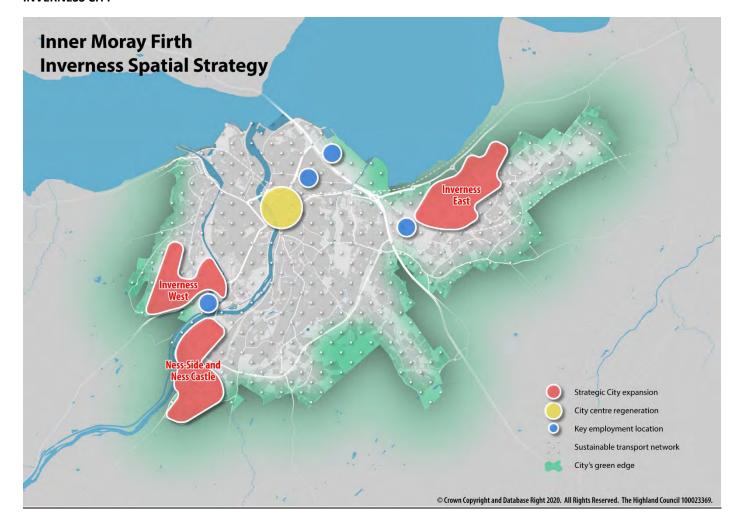
Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.

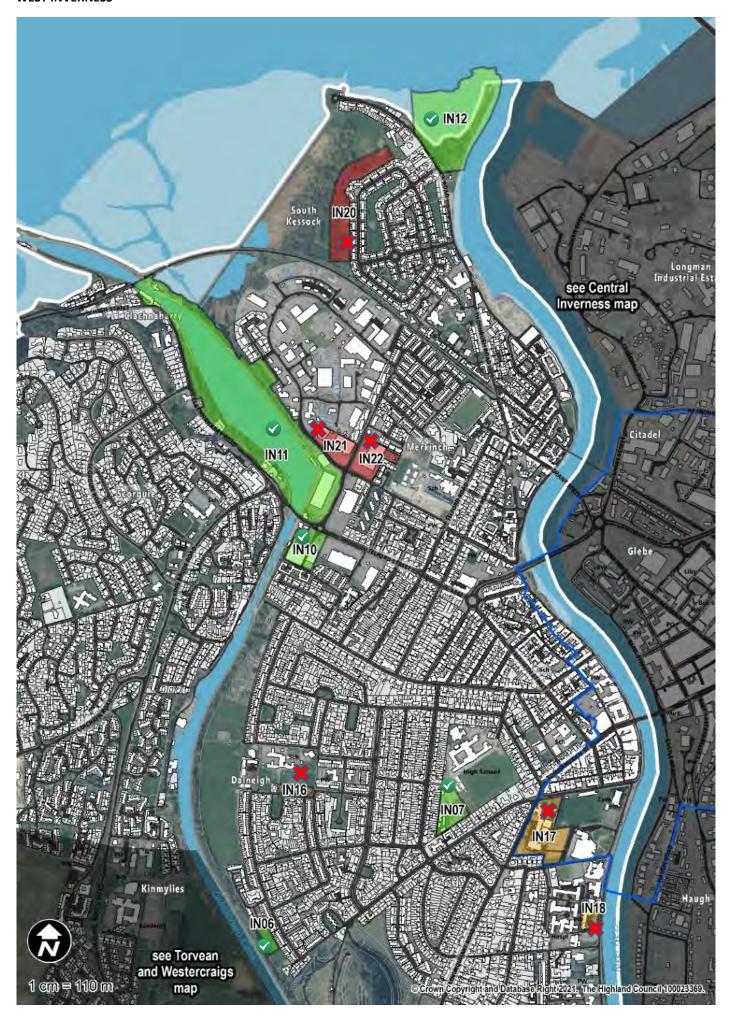


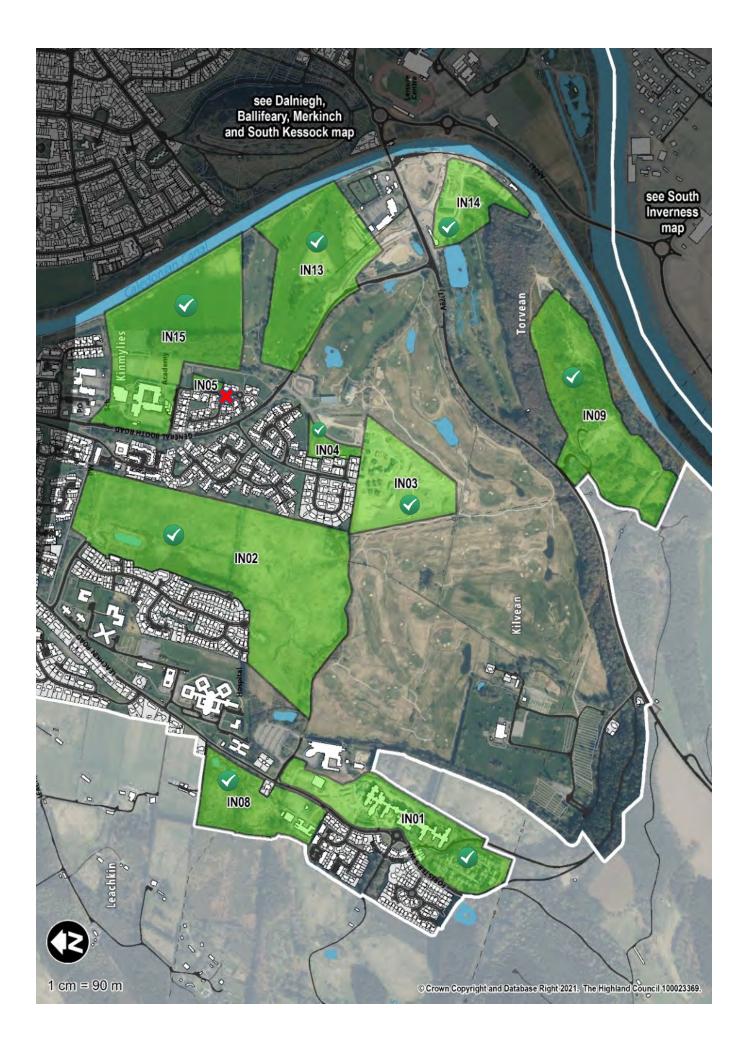
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------|--------------------------------------|-------------------------------------|
| Glebe | Housing, Community, Business | 10 |
| Village Centre | Housing, Community, Business, Retail | 10 |

INVERNESS CITY



- Support the regeneration of Inverness City Centre by directing footfall-generating uses there and by preventing an increase of out-of-town retail development.
- Celebrate the City centre as a core of living, working and leisure destinations for the Highland region.
- Deliver the City's housing needs in strategic expansion areas, shown on the Inverness Spatial Strategy Map, so that services and infrastructure can be effectively planned and delivered.
- Focus housing development within places that reduce the need to travel and where it is easy to walk, wheel, cycle or use public transport to reverse the trend of car-dependent suburban housing development.
- Bolster existing neighbourhood service centres and employment destinations by ensuring new development is conveniently located and well connected with them.
- · Prioritise transport improvements that get more people walking, cycling and using public transport.
- Safeguard and enhance the green networks, including the city's green edge, that run through the City and those that surround it.





Summary of Issues Raised in Comments (20 comments)

- NatureScot request plan provides opportunities to enhance green infrastructure to help promote active travel and safeguard the setting of Inverness.
- Lochardil and Drummond CC request active travel networks around Caledonian Canal and Torvean Quarry.
- Ballifeary CC note that large-scale events generate traffic and noise issues at Bught Park and Northern Meeting Park.
- Ballifeary CC request new community facilities,
 Northern Meeting Park and Bught Park may provide opportunities.
- Ballifeary CC request following green areas are protected from development: River Ness and Ness Islands; areas around Rugby Pitches, Holm Bridge and Caledonian Canal/Tomnahurich Bridge; Bught Park/Ballifeary area; Whin Park; Tomnahurich Cemetery; new park at Torvean Gateway; Playing fields for local primary schools and Canal towpaths. Note that some of these areas have potential for community growing, improved recreation facilities and management to encourage biodiversity and wildlife.
- Ballifeary CC request traffic management plan for area due to high traffic levels and parking on residential streets; improved public transport; active travel hub in or near the Northern Meeting Park; Infirmary Bridge kept open; better street lighting; pedestrian crossing on Bught side old swing bridge and improved provision for tourist coaches.
- Ballifeary CC concerned due to volume of holiday lets in area and wish for flats around Bught to be regenerated.
- Request for future development in Inverness West to be lower density; incorporate greater range of services and open space; encourage wildlife and incorporate effective insulation and renewable energy sources.
- Support for improvements to digital connections and schooling as these are vital services.

DALNEIGH, BALLIFEARY, MERKINCH AND SOUTH KESSOCK

- Objection to IN6 as wishes site to be allocated for greenspace and used for allotments.
- No comments were received on IN7 during consultation period. However, the Council's Education Service have since advised the site is required for the operational needs of the school and potentially further education provision.
- Landowner support for IN12 as proposal would complement nearby attractions and future development and provide economic and social benefits. NatureScot and RSBP suggest careful

Recommendations & Reasons

- The plan will show existing and opportunities for green infrastructure and a reference added to the West Inverness place making priorities.
- Improved active travel networks will be specified as a developer requirement for Torvean Quarry; the Torvean and Ness-side Development Brief identifies a number of active travel networks around the Caledonian Canal, further opportunities within the scope of the plan will be explored.
- Noise and traffic disruption during large-scale events at existing venues would usually be considered during the planning stages for an event and not in a development plan.
- There a number of new, existing and planned community facilities in the Ballifeary area, existing buildings and outdoor spaces at the Northern Meeting Park and Bught Park may provide opportunities.
- The plan will identify numerous greenspaces and green networks that will have protection from development including many of those requested by Ballifeary CC.
- A Transport Appraisal has been undertaken to inform the plan. It has a focus on developing a sustainable transport network. Any new development proposed will be required to prepare an appropriate level of transport study to accompany a planning application; this will help ensure existing transport issues are not exacerbated by new development.
- The Scottish Government have published legislation on introducing control areas to manage high concentrations of secondary letting in areas where it can affect the availability of residential housing. The Council are aware of the pressures in some areas of Highland and are considering options for a framework on policy on control areas.
- New mixed use development may act as a catalyst for regeneration of the wider Bught area.
- The range of development opportunities in West Inverness provide a variety of densities and incorporate a number of mixed use sites, protected open space and green networks.
- The Plan will continue to support improvements to digital connections and improved education facilities and increased capacity where required.

DALNEIGH, BALLIFEARY, MERKINCH AND SOUTH KESSOCK

Preferred MIR sites IN6, IN10, IN11 and IN12
 continue to be supported in the plan. Developer
 requirements will include mitigation to prevent
 adverse impacts on nature interests. Whilst IN6 is
 currently green space there is an opportunity for a
 large open space close by to the north be upgraded
 to compensate for the loss of open space at IN6.
 These sites represent opportunities for

- mitigation required to prevent adverse impacts on nature interests.
- Support for exclusion of IN20 due to loss of valued green space including from Merkinch CC.
 Preference to create a useable greenspace for wildlife and local community; suggest potential for extension of Merkinch Nature Reserve.
- No comments were received on IN16 during consultation period. However, Council's Education Service have since requested that IN16 is retained as part of the playing field as it is required for the operational needs of the school and amenity issues may arise from the close proximity of housing.
- Ballifeary CC support the redevelopment of IN17 as relocation of Council staff would bring economic benefits to the city centre.
- Ballifeary CC have a preference for tourism/leisure use for IN18 rather than housing, business and leisure.

TORVEAN AND WESTERCRAIGS

- Objections to IN04 and IN05 as valued green spaces that provides amenity value.
- Landowner supports allocation of IN02 for housing as its development would complete the Westercraigs expansion area and connect communities with the Charleston neighbourhood centre.
- Request for IN02 to include retail use; provide public transport and e-transport connections.
- Landowner supports allocation IN01 for housing but requests extension to include additional land (2.25ha) at south east of allocation because it does not form setting of listed building; to utilise green network opportunities; help form defensible settlement edge and add to residential offer at wider Westercraigs area.
- Landowner supports allocation of IN8 as it forms an integral part of the Westercraigs expansion area.
- Lochardil and Drummond CC do not support preferred uses at IN09 uses due to impact on trees, vegetation and wildlife; inconsistency with climate emergency and Loch Ness tourism potential area.
 Preference for allocation for recreation. NatureScot, Historic Environment Scotland and Ballifeary CC suggest careful mitigation required to prevent adverse impacts on nature and historic environment interests.
- Lochardil and Drummond CC object to uses suggested for IN14 due to landscape, visual and amenity impacts and consider uses are incompatible with green corridor and recreational use. Ballifeary CC wish to see a park and ride/cycle/stride facility to help reduce traffic in nearby residential areas.
- Objection to land at south eastern edge of Westercraigs development being excluded from the settlement development area because it creates an irregular shape; less defensible boundary and majority of land represents setting a listed building and therefore unlikely to be suitable for significant development.

- development consistent with the uses set out in the MIR.
- Allocate IN07 for community use to reflect to operational needs of the school.
- IN20 will be shown as protected greenspace to reflect the areas amenity value. This will also allow for opportunities to improve the open space.
- IN16 will be shown as protected green space given the entire playing field continues to be required for the operational needs of Dalneigh Primary School.
- IN21 and IN22 will not be allocated for development but shown as 'grey land' within the settlement development area given limited redevelopment opportunities for alternative uses due to flood risk.
- Comments on sites IN17 and IN18 are noted, however they will not be allocated for development. Instead they will be shown as 'grey' land within the settlement development area given there is currently no active redevelopment intention/interest.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

TORVEAN AND WESTERCRAIGS

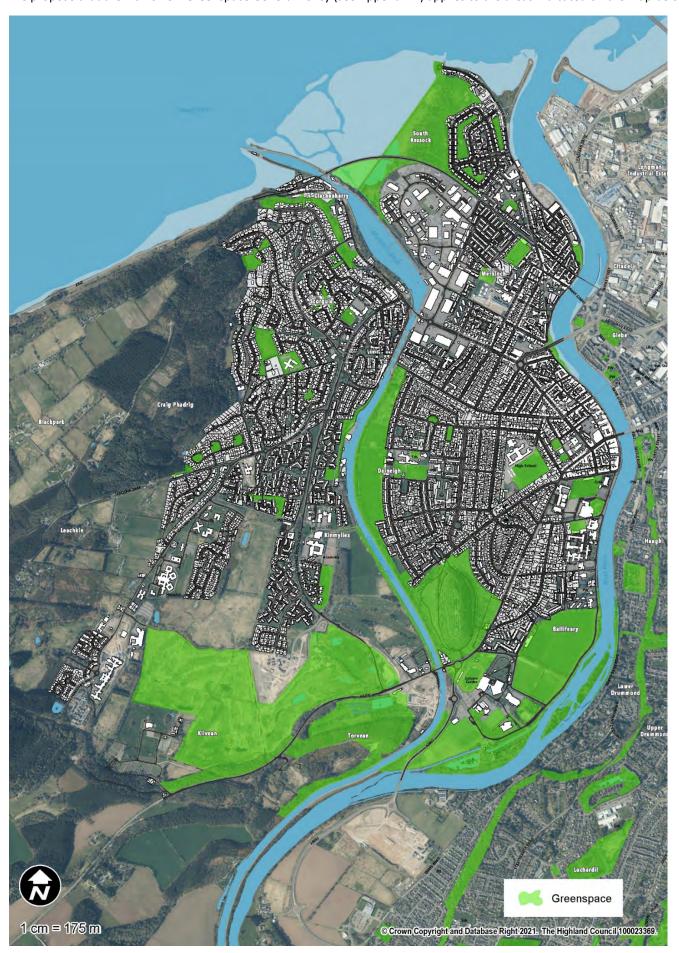
- The following preferred sites in the MIR continue to be supported: IN15, IN13; IN14; IN02; IN03; IN04 and IN08. Many of these sites benefit from longstanding support in the current Inner Moray Firth Plan and its associated development briefs, some also have planning permission and/or are currently being built out.
- IN04 currently comprises spoil heaps from nearby development. Its development will not affect the greenspace (including play area) adjacent to the north of the site and therefore the site continues to be supported for housing use.
- Site IN05 will be shown as protected greenspace to reflect the areas amenity value.
- Residential use only considered appropriate for INO2 given it is in relatively close proximity to shops and facilities at Charleston. Requirements for public transport connections and e-transport connections will be required as part of a planning application.
- Reduce IN01 to reflect area already built out within southern portion. Small extension to east of allocation to include currently vacant church building and open land. Change to mixed use allocation to include housing, retail and community to help facilitate the development of a mixed-use neighbourhood. Do not include requested extension at south east of site as would result in detrimental visual impact on the farmed slope that forms part of the setting of the city and additional housing sites are not required to meet the housing land requirement.
- Reduce IN03 to reflect area already built out.
- Continue to support mixed use development including community, business and industry at IN09. Developer requirements can ensure that nature and historic interests are protected and visual impact limited.

- Object to reduction of settlement boundary on the western edge of the city (adjacent to Westercraigs and encompassing Dunain Woods) because: forms an established and successful existing edge to this part of the City; sets a clear emphasis that area is an asset; enhances potential for limited development and general policies are sufficient to allow only appropriate development.
- Request new allocation for tourism/leisure use (community woodland with appropriate pockets of tourism / leisure development) on hill on land around Dunain Woods as would increase range of holiday accommodation in attractive locations in Inverness area; is close to public transport links; would provide contribution to upgrades to woodlands and this part of Great Glen Way; integrate with community woodland; establish area as a destination for local communities and visitors.
- The uses supported at IN14 are consistent with the Torvean and Ness-side Development Brief and continue to be considered appropriate in this location. The wider area provides a significant amount of green space. Detailed design advice to ensure high quality development is also set out in the development brief.
- IN19 was presented as an alternative option in the MIR will not be allocated for development. Instead it will be shown as 'grey' land within the settlement development area given there is currently no active redevelopment intention/interest.
- The settlement development area drawn in the MIR generally reflects the built up areas of Inverness and allocated sites. One reason for this was to provide additional control over development out with allocations to help reduce unplanned, piecemeal development. On this basis it is not considered appropriate to include land at the south eastern edge of IN01.
- The settlement development area at the south western edge of the city continues to be considered appropriate as it reflects the built up area of the city. Whilst the provision of additional quality tourism attractions and accommodation is supported in Highland it is not appropriate to include land partially within woodland to the west and allocate for tourism/leisure use given the limited potential for development within this area due to constraints. Should a proposal of this nature come forward in the future, the principle of development would be determined by policies contained in the Highland-wide Local Development Plan.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

- Safeguard the setting of the City in the west and south west afforded by the wooded and farmed slopes by restricting development to the current built up areas of Westercraigs, Kinmylies and Scorguie.
- Support the completion of the Westercraigs City expansion area, including provision of neighbourhood facilities.
- Promote the regeneration of Muirtown and South Kessock into vibrant mixed use neighbourhoods centred on new canal destinations that serve locals and visitors to the City.
- Promote mixed use development of the Torvean Gateway as a new City destination with parks and open space and new leisure, retail and food and drink destinations that celebrate the Caledonian Canal.
- Support the redevelopment of the Charleston Campus.
- Enhance greenspace and green networks to help promote active lifestyles and nature.

Greenspaces Map

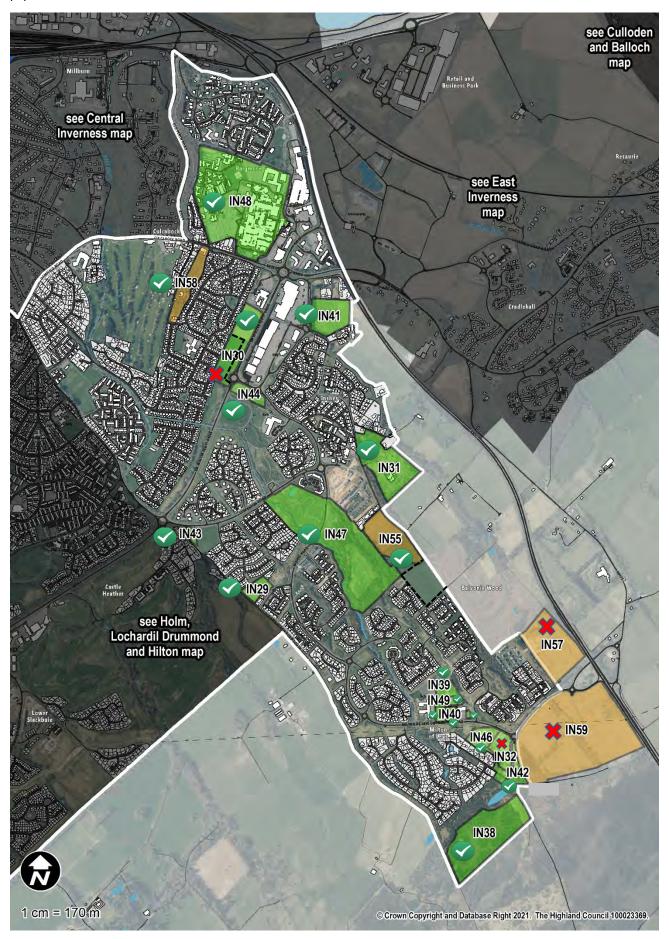
We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.

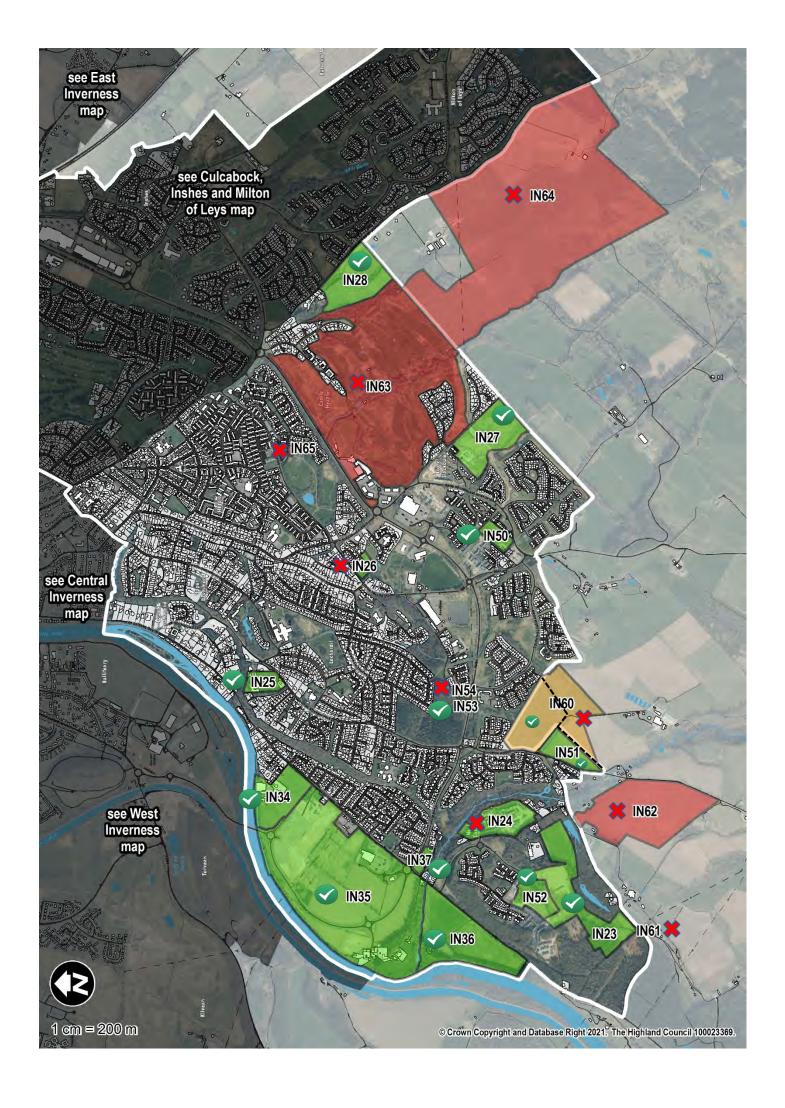


| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--------------------------|---|-------------------------------------|
| West of St Valery Avenue | Housing 16 | |
| East of Golfview Road | Housing | 12 |
| South of Golfview Road | Housing | 117 |
| East of Stornoway Drive | Housing | 90 |
| Muirtown Basin | Housing, Business, Community, Tourism, | 20 |
| | Leisure | |
| East of Muirtown Locks | Housing, Retail, Business, Tourism | 60 |
| Torvean North | Housing, Community (Education), | 30 |
| | Greenspace | |
| Torvean South | Community, Leisure, Office, Business, Retail, | 10 |
| | Housing (limited to one bedroom homes) | |
| Torvean Quarry | Business, Industry, Community | n/a |
| Westercraigs South | Housing, Retail and Community | 30 |
| Westercraigs North | Housing and Retail | 66 |
| Charleston Campus | Community (Education), Greenspace n/a | |
| East of Dochfour Drive | Community n/a | |
| Merkinch Shore | Community | n/a |

SOUTH INVERNESS

Several sites received a small number of comments in support or against sites or suggestions for amendments to uses, these comments are not summarised individually here but have been taken into account in preparing the recommendations for these papers.





| Summary of Issues Raised in Comments | Recommendations & Reasons |
|---|---|
| IN23: Holm CC raise concerns over transport impacts of development at Ness Castle. | Ness Castle has an established strategy to manage its impacts on the transport network through the permissions granted for the site, it is considered that this, coupled with detailed Developer Requirements for the site will manage development appropriately. |
| IN26: Lochardil and Drummond CC do not support development of Culduthel Place (IN26) because of concerns about floodrisk and impacts on biodiversity. Other concerns about the site include that it is an important wetland with biodiversity value that floods and that further development could impact upon residential amenity and road safety. Local residents highlight part of the site is in their ownership and that they do not support developing it for another use, the site proponent has confirmed ransom-free access to the site. | It is considered that, given the value of the site to local residents and the wider community, coupled with the biodiversity and greenspace attributed afforded by the current land use, that development of the site would not be appropriate and should therefore be safeguarded as protected open space. |
| IN30: Culcabock and Drakies CC do not support the preference of this site, but request that any development that is permitted be restricted to a maximum two storey, incorporating areas of open space for amenity, a separation buffer from Drakies and Sir Walter Scott Drive, and no connecting vehicular access into Drakies. Similar requests were also made from members of the public. Other comments include concerns that the site is currently shown as protected open space in the aIMFLDP which could be lost to development, that residential amenity should be protected, that flooding is a problem for the site, that schools cannot accommodate further housing growth and that there are legal restrictions over the use of the land. One respondent requested retail and business use to be added to the mix of uses permitted on the site. | It is recognised that the Drakies Park area is a valued community space. The site boundary is proposed to be amended to limit development of this area <i>only</i> to permit vehicular access, with compensatory open space provided for that lost set required of developers of the site. Detailed Developer Requirements will be set for the site to take account of environmental constraints and residential amenity, as well as requiring financial contributions to mitigate impacts of development on infrastructure, including local schools. It is considered that whilst this site could be supported for residential use, it would not be acceptable to introduce other uses to the site in order to safeguard the integrity of the adjacent open space, residential amenity, and to limit further impacts on an already congested part of the transport network. |
| IN36: Holm CC raised concerns about impacts of development on the transport network, and suggest a range of interventions to address the impacts. Another comment requested that Proposed Plan recognises that the site has potential to deliver housing, a retirement village, a residential care home and a nursery. | Developer requirements will be set for the site to ensure that any impacts of the range of uses identified for the site will be mitigated by the developer. |
| IN44: Inshes and Milton of Leys CC object to identifying the site for a mix of uses because it does not want to preclude integrating the site into Inshes park; sufficient commercial uses are adjacent; allocation contradicts the vision and placemaking priorities; and retail development in proximity to the school would be inappropriate and would cause road safety concerns. Other comments include support for the site and mix of uses identified, highlighting that it is not an integral part of the park, but could provide additional services and an active use for the site, and objections to the mix of uses that would undermine the ability to complete the vision to integrate this land as a gateway/ car park for Inshes District Park, would result in a loss of greenspace an undermine the work undertaken to establish the district-scale park facility. | The potential for the site to form a gateway to Inshes District Park is supported, but the evidence from the lifetime of the Adopted Plan is that an allocation for Community Use only did not realise this aspiration. It is considered that supporting a carefully controlled mix of uses (through explicit developer requirements for the site) will enable housing and other commercial uses to be supported, which will enable the development of the community aspirations for the site. |
| IN51 & IN60: Lochardil and Drummond CC consider the sites should be retained for agricultural/ food growing, but consider IN51 is not accessible for community use due to the presence of the flood alleviation channel and limited width of the public road. Other public comments reflected this position. A community-led initiative to acquire the site and deliver allotments is underway, with local surveys showing support for food growing uses for the site. | The local community energy to deliver local food growing is a positive opportunity to reflect the vision and placemaking priorities set out in the Plan as well as wider Council and national government agendas. However, this has to be considered on balance with the need to support effective sites to deliver much-needed housing for the city. Moreover the scale of the site would result in a major allotment site that could result in people driving to the site to grow food, rather than growing in their local area. Therefore two MIR sites have been merged, and the boundary refined to show a single mixed use site for housing and community food growing. It is |

Other comments included concerns over transport impacts, considered that this will enable the community's aspirations loss of good quality agricultural land for food growing and for food growing to be realised and, through the use of capacity of local schools. Developer Requirements, the housing element of the site can provide the enabling infrastructure for the allotments to be delivered in parallel to the housing development. **IN57:** comments on this site support its safeguarding for The Main Issues Report proposed removing the allocation for community use only, some highlighting local initiatives to the site and moving the Settlement Development Area deliver a woodland and park. Boundary to exclude the site. This is considered an appropriate way to safeguard the site from development by it being in the countryside hinterland, whilst not preventing the community aspirations for afforestation and recreation uses. IN59: Some comments argue housing would not be It is considered that the Main Issues Report reasons for not appropriate for the site, others highlight recreation and supporting the site remain valid and that it should not be public access needs of the local community. One comment supported for development, but rather safeguarded from it argues the site should be supported for development as it is through non-allocation and contracting the Settlement effective and would deliver 25% affordable homes. Development Area boundary of the city. IN61: Dores and Essich CC object to site not being included It is considered that the Main Issues Report reasons for not supporting the site remain valid and, coupled with the range of because they consider it will help meet housing needs in the other sites supported in the Proposed Plan, this site should not area outwith Dores village, consider it does not have infrastructure constraints and can be served by sustainable be allocated. transport. Lochardil and Drummond CC support the nonpreference of the site. Other comments support the nonpreference of the site to safeguard natural heritage and rural character of area. IN63: Slackbuie CC, Lochardil and Drummond CC and Inshes It is considered that the Main Issues Report reasons for not and Milton of Leys CC support the non-preference of the site supporting the site remain valid and the overwhelming for development for reasons that include its openspace, majority of comments support this position, including the biodiversity, recreation and settlement character. They raise community's support through the local and neighbouring two concerns that such a scale of development would impact community councils. It is therefore recommended that the site community and transport infrastructure and lead to a be safeguarded from development and should continue to be significant community resource. Other comments received on protected as an important greenspace for the city. this site reflected the community council views. All comments, except one, supported the non-preference of the site for development. IN64: Inshes and Milton of Leys CC support the non-It is considered that the Main Issues Report reasons for not preference of the site for development, concerned about supporting the site remain valid and most comments support increased flood risk, transport and community infrastructure this position, including the community's council's. It is impacts, impacts on historic environment as well as impacts therefore recommended that the site not be allocated for on landscape and settlement character. Other comments housing, and remains part of the countryside hinterland received on this site reflect the community council views. surrounding the city. One comment argued against the conclusions of the Site

Assessment's conclusions on the range of topics considered,

arguing the site should be allocated for housing.

- Support the long-term strategy of delivering new, sustainable city expansions at Ness-side and Ness Castle.
- Encourage more sustainable, walkable communities by delivering neighbourhood services and facilities, as well as housing, in central locations where it is easy to move around by active modes (walking, wheeling and cycling).
- Support the delivery of improved active travel and public transport provision by ensuring higher density development, where appropriate.
- Safeguard the character and setting of the City to the south by preventing further development on upper slopes.

Recommended Development Sites

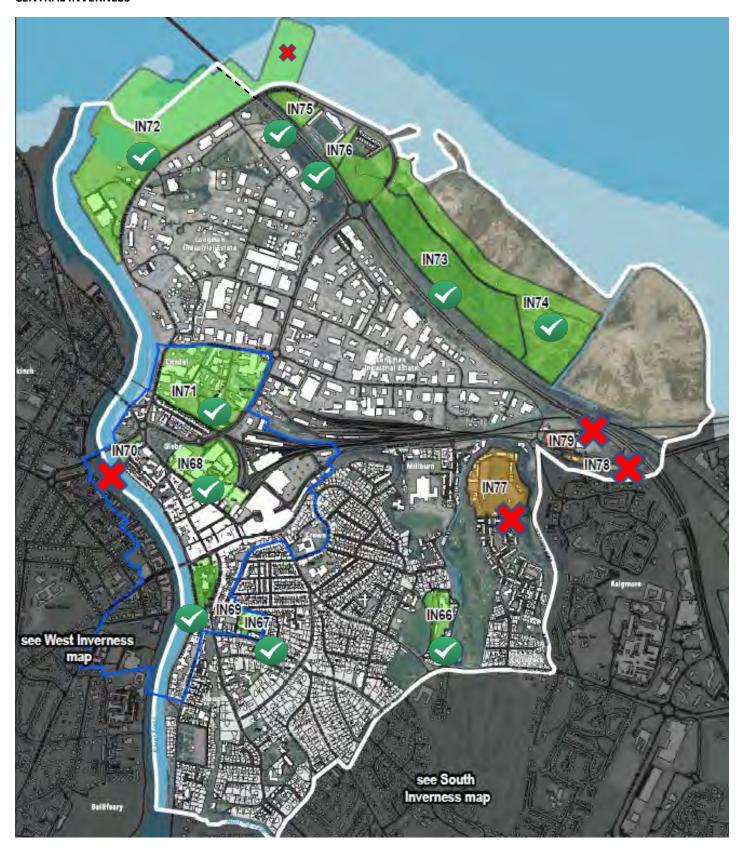
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|---------------------------------------|--|-------------------------------------|
| Drakies House | Housing | 36 |
| Inshes Small Holdings | Housing | 101 |
| Dell of Inshes | Housing | 50 |
| Druid Temple | Housing | 155 |
| Milton of Leys Centre | Housing | 11 |
| Wester Inshes Farm South | Housing | 40 |
| Milton of Leys Care Home | Housing | n/a |
| Bogbain West | Housing | 100 |
| Earls gate | Housing | 110 |
| Drummond Hill | Housing | 38 |
| Ness-side (Central) | Housing | 300 |
| Holm Burn Place | Housing | 10 |
| Ness Castle West | Housing | 110 |
| Ness Castle East | Housing | 180 |
| Ness-side South | Housing | 150 |
| Sir Walter Scott Drive | Housing | 80 |
| Ness-side North | Housing, Tourism, Retail, Business | 100 |
| Knocknagael | Housing, Community (Allotments) | 100 |
| Ness-side South East | Care Home, Business (Day Nursery) | n/a |
| East of Milton of Leys Primary School | Housing, Retail, Business | 15 |
| Old Edinburgh Road South | Retail, Community, Business | n/a |
| Inshes Road | Housing, Business, Community (Inshes Park) | 20 |
| Milton of Leys Centre (East) | Business, Retail | n/a |
| Culduthel Road Funeral Home | Business | n/a |
| North of Redwood Avenue | Business | n/a |
| Slackbuie Pitches | Community | n/a |
| Raigmore Hospital | Community | n/a |
| Milton of Leys Primary School | Community | n/a |
| Inshes District Park | Community | n/a |
| North of Castleton Village | Community | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



CENTRAL INVERNESS



Several sites received a small number of comments in support or against sites or suggestions for amendments to uses, these comments are not summarised individually here but have been taken into account in preparing the recommendations for these papers.

Summary of Issues Raised in Comments

- Suggestion to include a green recovery plan within the Placemaking Priorities to address biodiversity loss and the climate emergency.
- Concerns about allocating land in Inverness Old Town due to potential for impacts on historic built environment.
- Concerns over potential impacts on biodiversity and residential amenity north of the Firth, direct impacts on the Moray Firth SPA and SAC, and indirect impacts on other designates sites and species, which require to be carefully assessed and mitigated. Concerns over proposed land reclamation, which could impact resilience of coast to sea level rise and flooding, therefore contrary to key national policy documents.
- Transport Scotland highlight potential for some of the development of sites identified to impact trunk roads.
- Concerns over loss of parking for Caledonian Stadium for sporting events and impacts on surrounding areas.
- Support for expansion of city centre, with potential to meet economic needs, including small-scale industrial/business and significant footfall generating uses.
- Support for reconnecting the city centre with a regenerated, mixed-use waterfront that can support economic growth.
- Support for inclusion of integrated public transport interchange.

Recommendations & Reasons

- Placemaking priorities have been revised to reflect the importance of green assets as part of the Climate Emergency and green recovery.
- Concerns over potential impacts on the built and natural environment are addressed through Developer Requirements for allocated sites that ensure potential impacts are assessed and appropriately mitigated.
- Green space and green networks are identified for the Plan and therefore concerns about impacts on these assets and the wider biodiversity benefits they bring are addressed by the Plan.
- A Transport Appraisal has been updated to inform the preparation of the Plan, in consultation with Transport Scotland. Transport issues are addressed in both this document and within the Developer Requirements for specific sites, where impacts can be assessed, and appropriate mitigation put in place.
- It is recommended that the Settlement Development Area be amended edited IN72

Placemaking Priorities

- Consolidate the city centre and prioritise urban living through strategic expansion of residential-led mixed use development to the north and reuse/repurposing of existing buildings (e.g. empty and underutilised floorspace above retail units), while safeguarding retail, food and drink and business opportunities.
- Increase employment opportunities by supporting redevelopment of existing buildings for office, business, leisure, healthcare and community uses.
- Support diversification of the economy, including the creation of new and unique visitor and leisure attractions that make best use of existing assets and improve the urban environment.
- Embed walking and cycling as the logical choice and easiest way to make every journeys, including delivering active travel and public realm improvements across the city centre.
- Meet regional and local industrial land supply needs at the former Longman landfill site.
- Harness the district's built, natural and cultural heritage assets to ensure the area is distinctive, attractive and supports a green recovery.
- Ensure relevant development proposals comply with Policy XX: Inverness City Centre Development Brief.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------|--|-------------------------------------|
| Diriebught Depot | Housing | 70 |
| Porterfield Prison | Housing and Tourism | 30 |
| Inverness Public Transport | Public Transport Interchange, Ancilliary | 30 |
| and Freight Interchange | Retail and Leisure, Storage and Distribution | |
| Inverness Central | Housing, Community (Civic/ Green and | 40 |
| | Open Space), Retail, Business. | |
| Shore Street City Centre | Housing, Business, Retail, Industry, | 50 |
| Expansion | Community | |
| Harbour Gait (Boundary | Industry, Business, Retail, Cultural and | n/a |
| limited to west side of | Tourism | |
| Kessock Bridge) | | |
| Stadium Road West | Office, Business, Industry | n/a |
| Stadium Road East | Business and Industry | n/a |
| Former Longman Landfil | Business, Industry, Temporary Stop Site for | n/a |
| Westl | Travelling People | |
| Former Longman Landfill | Industry | n/a |
| East | | |

EAST INVERNESS



Summary of Issues Raised in Comments (36 comments)

GENERAL COMMENTS

• NatureScot requests plan identifies existing and opportunities for green infrastructure to help develop active travel links and improve connectivity for people and wildlife.

CULLODEN AND BALLOCH

- Support from landowners for long established development sites at Stratton Farm (IN81, IN82, IN83, IN89, IN90, IN91, IN92, IN93). Landowners committed to continuing to deliver wider site and infrastructure requirements during the plan period.
- Suggestion that there may be capacity for housing to be developed rather than retail at Stratton Farm, subject to further traffic modelling and mitigation.
- Objections to IN102 because: loss of greenspace and good agricultural land; impact on
 woodland and wildlife; limited capacity of roads, schools and other public facilities;
 road safety issues and no community benefits. Requests, including from Balloch CC, for
 infrastructure to be provided first and allocation for greenspace and community use
 only and for these uses as well as housing.
- Historic Environment Scotland request developer requirements for IN102 require
 mitigation of impacts on Inventory Battlefield of Culloden, Culloden Muir conservation
 area and Culloden House Garden and Designed Landscape.
- Request for large extension/new allocation for 200 homes north and west of IN102 due to future farming viability issues caused by development of IN102.
- Support for IN104, including from Balloch CC, but preference to be retained as greenspace for sports pitches and all-weather courts; oppose any development of buildings or car parking.
- Landowner of IN105 wishes site to be allocated for housing as it is allocated in current
 plan and forms part of a development brief, under control of two developers who are
 committed to delivering the site and is not constrained by infrastructure or viability
 issues.

Recommendations & Reasons

GENERAL COMMENTS

 The plan will show existing and opportunities for green infrastructure and a reference added to the East Inverness place making priorities.

CULLODEN AND BALLOCH

- Allocate sites at Stratton Farm (IN81, IN82, IN83, IN89, IN90, IN91, IN92, IN93) for uses specified in the Main Issues Report and consistent with the Inverness East Development Brief as many of these sites benefit from an extant planning permission and/or an allocation in the current development plan and are detailed in the Inverness East Development Brief. Together they will promote the coordinated expansion of the eastern part of the city.
- Whilst planning permission is in place at Stratton Farm, the Inverness East
 Development Brief allows for some flexibility in this area subject to a new
 planning application with appropriate supporting information.
- Allocate IN102 given planning permission was granted for 298 dwellings and associated works in August 2021. Specify housing and community uses to reflect planning permission and ensure community use would be provided should any alternative proposals come forward for the site. Specify developer requirement to ensure appropriate mitigation of historic interests.
- Do not allocate new site suggested north and west of IN102 because it was submitted too late in the plan making process to be fully considered and is not required to meet forecast housing need/demand.
- Allocate IN104 for redevelopment of Culloden Academy but reduce extent
 of site to reflect area acquired by the Council for redevelopment of the
 school. Do not specify form or layout of development to allow for flexibility
 as proposals are developed. Should built development be proposed within
 expansion site appropriate mitigation required to limit impacts.
- Allocate IN105 for housing given that sufficient evidence has been provided to demonstrate the site is viable and not constrained by landownership.
- Exclude IN106 and IN108 because they are peripheral to the City's structure and facilities. Furthermore, sufficient land is identified to meet the areas housing need and no evidence has been provided to demonstrate the sites are effective.
- Settlement Development Area (SDA) to be drawn in to exclude allocations that are not confirmed.

ASHTON FARM/RETAIL PARK/CRADLEHALL AND WESTHILL

- Concern that infrastructure upgrades required to deliver housing, including affordable housing, are not committed in terms of funding and timescales.
- Support from landowner of IN80 for allocation of site. Site is effective as under construction intend to submit planning application for remainder of site in 2021.
- Support from landowners of IN95, IN84, IN86, IN88 (part) at Ashton area of Inverness
 East for development. Firm commitment to deliver development following confirmation
 of delivery of East Link.
- Landowner of IN88 (part) does not intend releasing land for community use in the future.
- Landowner of IN97 wishes allocation of a greater range of uses including hotel, leisure, retail and food and drink because: limited demand for office or business use; existing over supply of office accommodation in Inverness; complement existing uses at retail park and access infrastructure already in place.
- Landowner of IN103 wants site allocated for housing as well as office, business and retail as there is a precedent for housing in this area. Also request an extension to include land to the west for 3 houses.
- Historic Environment Scotland consider potential for adverse effects on the historic environment assets close to IN109 and support exclusion of IN110 as part of the site is likely to be a key feature of Culloden Battlefield.
- Support for non-inclusion of IN111, IN113 and IN114 for reasons including to impact on natural environment and biodiversity; additional pressure on infrastructure (roads, schools and amenities); flood risk and adverse landscape impact on the approach to Inverness and wider views.
- Landowner accepts that inclusion of IN111 in the forthcoming plan may be premature but asserts site could include a primary school to help capacity issues.
- Request for IN115 to be allocated for affordable housing as would help address the current shortfall.
- Request for IN113 to be allocated for housing for the following reasons: principle
 established through current consent for leisure and tourism complex; no demand for
 leisure/tourism complex; no reduction of useable open space; accessible; no impact on
 core path; no landscape or cultural heritage impacts with mitigation and willing to pay
 developer contributions.
- Request for additional site to be allocated at Myrtlefield (south of Culloden Road) for 200 homes because: no major constraints; compensate for the loss housing land due at Milton of Culloden due to deallocation; viable and limited landscape and visual impacts and cultural heritage impacts.

ASHTON FARM/RETAIL PARK/CRADLEHALL AND WESTHILL

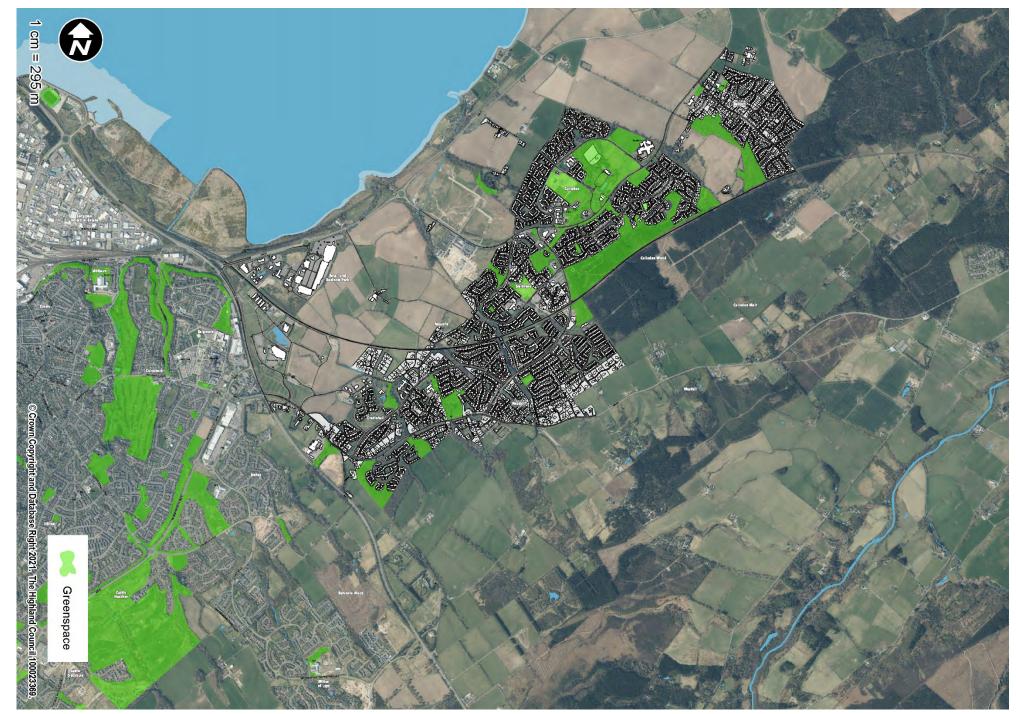
- Continue to support development at Inverness East. The Inverness East
 Development Brief acknowledges that delivery of significant parts of
 Inverness East are dependent upon the delivery of East Link and dualling of
 the A96. East Link is now at an advanced stage and expected to be delivered
 prior to 2027 and a firm commitment to dual the A96 remains. Sites within
 Inverness East area allocated for community uses, including schools and a
 health centre.
- Allocate IN80 for housing as site is effective and will help promote the coordinated expansion of the eastern part of the City close to existing and planned local facilities and services.
- Allocate sites at Ashton Farm (IN84, IN86, IN87, IN88, IN94, IN95, IN96) for
 uses specified in the Main Issues Report and consistent with the Inverness
 East Development Brief. Allocate IN99 for community and leisure uses as
 well as office, business and industry to allow for recent velodrome
 proposal. Many of these sites are in the middle and later phases of the East
 Inverness expansion area and dependant on the delivery of certain pieces
 of infrastructure prior to development.
- Allocate IN97 for wider range of uses including office and business, leisure, tourism, storage and distribution subject to city centre options being thoroughly assessed and any impact on the city centre considered acceptable. It is accepted that there is limited demand for additional office accommodation in Inverness. Site has been vacant for some time; an appropriate development would improve the appearance of site and provide additional facilities at the retail park. Retail and food and drink uses continue to be considered inappropriate in the absence of any evidence of impact on city centre.
- Allocate IN103 for housing as well as office, business and retail. Housing
 considered an acceptable land use as site lies within a predominately
 residential area. Specify access must be taken from existing access to
 Cradlehall Neighbourhood Centre. Do not support extension to west due to
 constraints, in particular presence of woodland and burn.
- Exclude IN110, IN109, IN115, IN111, IN114 and IN112 because they are
 peripheral to the City's structure and facilities. Furthermore, sufficient land
 is identified elsewhere to meet the areas housing need. Exclude IN107 due
 to presence of constraints.
- Exclude IN113. Site is allocated for business/tourism in current plan and has
 planning permission for a leisure/tourism complex. Its current use does not
 cause any negative impacts and it would be inappropriate to allocate for
 housing use when there are other, adequate, better located sites already
 allocated for housing. Given that there is currently no proven demand for
 the tourism/leisure development permitted is considered showing the land

| are not confirmed | | as countryside out with the settlement development area would be most appropriate. Do not allocate additional housing site at Myrtlefield as it was suggested too late in the process to be considered and sufficient land is identified elsewhere to meet the areas housing need. No comments were received on IN100, IN101 and IN85. It is proposed to carry these sites forward to the proposed plan for the uses outlined in the Main Issues Report. Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed. |
|-------------------|--|---|
|-------------------|--|---|

- Apply the Inverness East Development Brief to deliver modern, sustainable, mixed use city expansion.
- Support further development of Inverness Campus as a world-class business location for life sciences, digital healthcare and technology.
- Support the diversification of uses at neighbourhood centres to achieve vibrant mixed-use employment and retail uses.
- Safeguard the green network, character and setting of the City by limiting development to the existing built edges of Culloden, Balloch, Westhill and Cradlehall.
- Develop active travel links and improve connectivity for people and wildlife.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--|---|-------------------------------------|
| Easterfield | Housing | 30 |
| Stratton North Housing | | 160 |
| Stratton East | Housing | 235 |
| Stratton South | Housing | 140 |
| Ashton East | Housing | 90 |
| Castlehill | Housing | 125 |
| Ashton South | Housing | 110 |
| Milton of Culloden South | Housing | 330 |
| Ashton West | Mixed Use (Housing, Community (primary school), Business, Retail) | 90 |
| Ashton Central | Mixed Use (Housing, Community (High School), Business, Retail) | 180 |
| Stratton Central | Mixed Use (Housing, Business, Retail, Community) | 65 |
| Stratton West Mixed Use (Housing, Retail, Park and Ride) | | 60 |
| Eastfield Way | Mixed Use (Office, Business, Leisure, Tourism, Storage and Distribution) | n/a |
| Ashton Southwest | Mixed Use (Office, Business, Industry, Leisure and Community) | n/a |
| Inverness Campus | Mixed Use (Office, Business, Community) | n/a |
| Castlehill Road | Mixed Use (Housing, Office, Business) | 10 |
| Cradlehall Court | Mixed Use (Office, Business, Retail, Housing, Greenspace) | 15 |
| Balloch Farm | Mixed Use (Housing and Community) | 180 |
| Stratton Primary School | Community (Primary School) | n/a |
| Stratton Park Community | | n/a |
| Ashton Park Community | | n/a |
| Ashton District Park Community | | n/a |
| Inverness East Recycling Centre | Community (Recycling Centre) | n/a |
| Culloden Academy | Community (Secondary School) | n/a |
| Stratton Health Centre | Community (Healthcare) | n/a |
| Highland Prison | Community (Prison) | n/a |



Summary of Issues Raised in Comments (15 comments)

- Objections to site KT05, KT06 and KT08 because of settlement pattern, loss of good farmland, sustainability, no quantitative need/demand, and infrastructure capacity issues.
- Support for KT01, KT02, KT07 because sustainable, extant permission, fit with settlement pattern, serviceable and/or will deliver much needed community facilities.
- Belladrum Estates support KT01, KT02 but oppose KT03 because excessive land take and suggest KT07 for longer term development.
- Kiltarlity Community Council supports KT01 and KT02 subject to improved infrastructure, KT03 subject to much reduced size and KT07 if longer term and possible community use.
 Objects to KT05, KT06 & KT08.
- NatureScot suggests woodland and greenspaces as Green Networks (GNs).
- Landowner of KT05 & KT08 asserts KT05 sustainable, serviceable, effective and any infrastructure constraints can be addressed via contributions or public investment.

Agrees KT08 currently unsuitable.

- Development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school and sewage works can accommodate this limited expansion. Land at Glebe Farm is part developed, part serviced and close to the local primary school. There are other alternative development sites in close proximity to Kiltarlity's facilities but these would open up much larger development opportunities for which there is neither quantitative need nor servicing capacity. The Old Mill is a brownfield redevelopment opportunity that could provide local employment opportunities. Additional lair capacity is likely to be needed at the parish burial ground within the Plan period so a proportionate (reduced) expansion area is safeguarded.
- Add better references to need to safeguard and improve GN habitat and active travel connectivity.

- To consolidate Allarburn village as a compact hub of facilities to serve the wider parish catchment and to safeguard land for the expansion of the parish burial ground.
- To limit further housing development to the capacity of existing education, water and sewerage assets.
- To direct that development to the core of the settlement. In the longer term, a further phase of development between the school and the Glebe would be the optimum location for future growth.
- Mature woodland, amenity area and recreational pitch features surround and punctuate the village, are important to its character, and therefore merit protection and enhancement. The tree belts in particular are vital as green networks and as visual breaks and frames for public views.
- To retain and enhance active travel connectivity within Kiltarlity in particular to its facilities such as the village hall, primary school and burial ground.

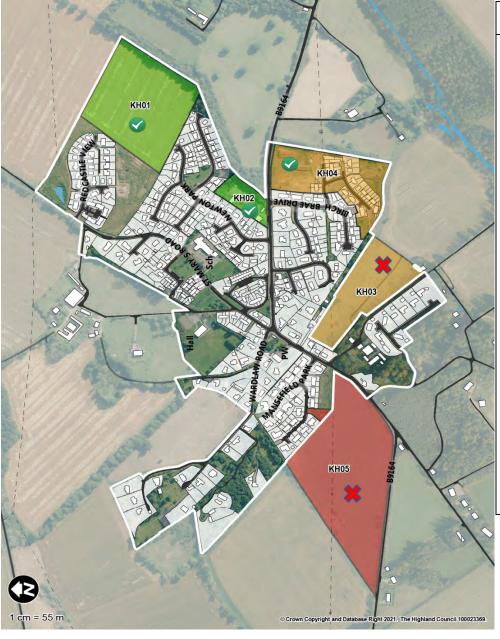
Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--------------------------|--|-------------------------------------|
| Glebe Farm Phase 2 | Housing | 40 |
| Glebe Farm Frontage Land | Community | n/a |
| Kiltarlity Parish Church | Community (Burial Ground extension only) | n/a |
| Old Mill | Business | n/a |

KIRKHILL



Summary of Issues Raised in Comments (10 comments)

- Support for Kirkhill section of strategic cycle route to Beauly and Inverness, to be referenced in Plan.
- Support for no development on site KH05.
- Opposition to large scale development.
- Support for local shop and small scale affordable housing.
- Support for restrictive Hinterland policy around Kirkhill.
- Proposal for 36 houses on site KH04.
- Proposal for 1 house on site of former Clunes House.
- Kirkhill & Bunchrew Community Council support tighter control on rural development or seek infrastructure improvements to service it.
- Support for protection of local woodland and Green Networks (GNs) as multi use corridors.
- Housebuilder proposal for development of KH05 – argue that large scale development will increase local facilities and decrease commuting.

- Future development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school, with a small extension, and sewage works can accommodate this limited expansion. Land at Groam Farm is permitted, close to the local primary school and is already part serviced. The builder's yard is central to the community, has been underutilised for several years and would therefore benefit from redevelopment.
- Other expansion options are not required in quantitative terms and/or suffer from greater constraints.
- A single house at Clunes may be acceptable but should be pursued as a housing in the countryside proposal.
- Add better referencing to GN and active travel connectivity to reflect comments on these topics.

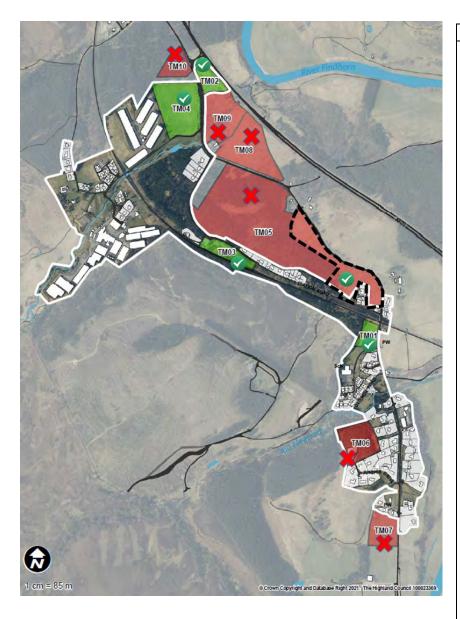
- To consolidate Kirkhill with new development closest to its facilities but to curtail larger, peripheral expansion.
- To limit further housing development to the capacity of education, water and sewerage assets.
- To direct that development to land at Groam Farm which is part developed, part serviced and close to the local primary school and is the optimum location for consolidating the village in a compact form.
- Mature woodland, amenity area and recreational pitch features surround and punctuate the village, are important to its character, and therefore merit protection.
- To seek developer contributions and other funding towards the provision of an active travel link between Kirkhill and both Beauly and Inverness.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------------------|--------------------------------------|-------------------------------------|
| East of Birchbrae Drive | Housing | 25 |
| Groam Farm | Housing, Community, Business, Retail | 94 |
| Contractor's Yard | Housing, Community, Business, Retail | 10 |



Summary of Issues Raised in Comments (6 comments)

NatureScot support the Placemaking Priority to safeguard all areas of woodland but highlight opportunity to protect watercourses along with enhancement of green and blue corridors which can be multi-use, particularly Tomatin and Moy.

Network Rail note the aspiration to reopen the rail station but highlight a STAG appraisal needs to be undertaken to consider viability and as owners of TM03 they have no plans for the site.

Strathdearn Community Developments (Local Community Company)

- object to Tomatin becoming a Growing Settlement
- request reference to other facilities, not listed in MIR
- support smaller, more sustainable housing allocations (including custom/self-build plots options) to replace 'non preferred' sites TM05 and TM08.
- request expansion of uses of TM03 to Mixed Use (Community, Business, Tourism, Light Industry, Housing)
- Other priorities for development include: active travel to village centre; wastewater treatment plant; affordable housing; inclusion of home working units; multi-use green network; transition to mixed species woodland.

Tomatin Estate:

objects to the de-allocation of large scale housing sites from the plan because: new housing is required to sustain services/facilities; the only proposed housing allocation has detailed planning consent and will be built out in short term; undermines the prospect of reopening the rail station; best way to deal with foul drainage issue is to allocate sufficient housing land; helps join up the settlement; capitalises on the A9 dualling; more viable now than previously; efforts have been made to develop the site; they gifted TM7 for

- Reaffirm Tomatin as a Main Settlement.
- Placemaking Priority relating to woodland protection broaden to protect and enhance green networks more generally for active travel and biodiversity.
- Reaffirm site TM03 mainly as safeguard for a new rail station if, as Network Rail highlight, that a viable business case can be made, and funding is secured.
 With no specific proposals to develop the site for anything else and it's availability for alternative uses unknown, it is proposed to retain the allocation for Business and Industry.
- Tomatin to remains in the third tier of the settlement hierarchy which reflects the limited level of local facilities and sustainable transport options available. Consequently, support for modest levels of housing growth is appropriate. Land west of the church was gifted as a means of offsetting affordable housing contributions on land elsewhere, and the optimum site for this would be land north west of the railway viaduct as it is relevantly close to facilities and active

- affordable housing to offset the requirement for other sites.
- Object to Placemaking Priority to protect all woodland as some areas, including TM5 (adopted Plan ref) includes commercial plantation soon to be harvested.

Landowner of Melfort Estate (area around Allt Neacrath) requests: allocation of brownfield site capable of providing 2 homes, no infrastructure constraints, rounds off Tomatin, close proximity to school, alternative access from TM01; and Distillery Wood allocated for tourist accommodation which will help address increase in demand.

- travel connections are achievable (see black pecked site boundary on the map opposite).
- Land put forward at Melford Estate does not meet minimum requirements for allocation in the Plan and such proposals are considered best considered against Highland's general planning policies.

Placemaking Priorities

- Create a new mixed-use development close to the A9 junction to take advantage of its upgrade and the passing trade and employment opportunities that may flow from it.
- Develop new housing, particularly affordable housing to help retain young people and attract new people to the community.
- Create a continuous active travel connection between Tomatin and Moy.
- Explore potential for reinstating a rail halt to enhance public transport options for residents, attract business and tourists and reduce traffic on A9.
- Consider vehicle parking improvements at the community hub, including provision of EV charging points and disabled spaces.
- Preserve and enhance green networks within and around the settlement, particularly areas of woodland and watercourses, for the benefit of active travel use and biodiversity.

Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------|---------------------------|-------------------------------------|
| West of Church of Scotland | Housing | 12 |
| North West of Railway | Housing | 36 |
| Viaduct | | |
| Former Little Chef | Business, Tourism, Retail | n/a |
| Former Railway Station | Industry and Business | n/a |
| Distillery expansion | Industry | n/a |

Greenspaces Map

There no protected greenspaces recommended for Tomatin.

TORNAGRAIN



Summary of Issues Raised in Comments (3 comments)

- Croy Culloden Moor Community Council highlight the following: lack of affordable housing developed at Tornagrain is disappointing and is major priority; road from A96 to Tornagrain and onto Croy is exceptionally poor state of repair; Tornagrain has put pressure on both the primary school at Croy and Culloden Academy.
- Moray Estates as landowner broadly supports MIR position but objects to Placemaking Priority relating to A96 Landward Trail because: no further detail provided in plan of its delivery, proposed route and connections (if any) to Tornagrain.
- NatureScot recommend additional
 Placemaking Priorities: 1) identify nearby
 designations incl Kildrummie Kames GCR
 and SSSI, consists of large areas of Ancient
 Woodland Inventory and Scottish Semi Natural Woodland Inventory; 2)
 opportunities to include multi-use green
 networks throughout the settlement along
 with linking to the wider green spaces; 3)
 opportunities to incorporate the
 watercourses and waterbodies throughout
 the new settlement as blue networks and
 as nature-based solution for water
 management.
- NatureScot request exclusion of remaining woodland from allocation and developer requirement to protect woodland and another for the SSSI and GCR.

- Comments by Croy and Culloden Moor CC are noted but due to existing consents the Plan has limited scope to address the issues in the short term. Placemaking Priorities will ensure that they are considerations for future applications.
- Reference to the A96 Trails is included as it forms part of the adopted Green Network Supplementary Guidance (2013). It has been amended to fit with a more general active travel Placemaking Priority.
- Placemaking Priorities have been added to: Safeguard the Kildrummie Kames SSSI and GCR designations; Preserve and enhance green and blue networks.
- Much of the woodland within the site boundary is plantation forests and forms part of the approved development identified in the masterplan. It is therefore not suitable to remove them from the allocation.

- Continue the timely delivery of key facilities and infrastructure, particularly enhancements to connectivity and education provision.
- Upgrade the A96 roundabout prior to Phase 2 of development and Transport Scotland to deliver the A96 dualling between Inverness and Tornagrain prior to Phase 3 (unless demonstrated that additional phases can be suited accommodated).
- Ensure affordable housing is delivered and meets the needs of the wider community.
- Enhance options for active travel and other sustainable transport modes to key employment destinations, including Inverness Airport Business Park, and through the delivery of the A96 Landward Trail and North South Links.
- Maintain the delivery of high-quality design and layout by following the principles set out in the masterplan and design code.
- Preserve and enhance green and blue networks within and around the settlement, particularly areas of native woodland and watercourses, for the benefit of active travel use, water management and biodiversity.

Greenspaces Map

There no protected greenspaces recommended for Tornagrain as most of those masterplanned have yet to be provided/completed.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|---------------------|----------------------------|-------------------------------------|
| Tornagrain New Town | Housing, Community, | 750 |
| | Business, Retail, Industry | |

GROWING SETTLEMENTS

Summary of Issues Raised in Comments

Inchmore, which was/is proposed to be reclassified from being a Main Settlement to a Growing settlement, received the most comments. The Placemaking Priorities below have been augmented to reflect issues raised. NatureScot was the main respondent making similar comments about most Growing Settlements seeking Plan wording to better protect and enhance local greenspaces and green networks as conduits for the movement of people, wildlife and flood waters particularly along and across watercourses and woodland areas. Landowners at Inchmore oppose its reclassification as a Growing Settlement and suggest retention of allocated sites and a new development site to east of settlement. All claim their land is available, serviceable, and free of insurmountable constraints. These sites are ineffective in the Council's view and are not needed in quantitative terms. Local groups seek enhanced active travel connectivity, public transport links and flood alleviation at Inchmore. Glenurquhart Community Council agree with the stated Placemaking Priorities and concur with need to minimize development outwith the village envelope. At Balnain, residents seek enhancement to road safety via a lower speed limit and more footway provision, better management of surface water issues but agree that any further development should be very small scale and fit with preserving the rural character of the glen. Strathnairn Community Council's requests for land immediately adjacent to the East of Farr hall to be available for future development for a village store / coffee shop or community use and provision for affordable housing even within small developments are supported and included within the Placemaking Priorities for Farr and Inverarnie. For Foyers, Gorthleck and Whitebridge, the Local Development Plan aligns with the Stratherrick and Foyers Community Action Plan and identifies it as a material consideration within the Placemaking Priorities. A housebuilder supports the inclusion of Foyers as a Growing Settlement as this will encourage de

PLACEMAKING PRIORITIES

ABRIACHAN

- To respect the historic pattern of crofts and absence of a public sewerage system which necessitate continuity of the loose scatter of buildings and small existing groups of buildings at Balchraggan and Balmore.
- To take account of the limitations of the substandard horizontal and vertical alignment of the township road and its largely unadopted side roads which reduce the scope for safe vehicular access.
- To avoid the more visually prominent land either side of the road which should remain substantially open.
- To respect the settlement's elevation and climatic exposure which suggest that new building plots should be located where they offer some shelter from landform and/or retained planting.
- To protect the identity and setting of the community by avoiding its sporadic extension.

BALNAIN

- To support further small scale housing development where it will help underpin local community facilities.
- To direct most future development north of the A831 so as to protect the fine outlook west across open ground bordering Loch Meikle and avoid land at risk to flooding or erosion.
- To respect the limited local waste water treatment capacity.
- To support community initiatives to enhance local amenities, including management of the woodland beside the school, refurbishment of the play area, creation of a visitor focal point with better signage of local attractions and places of interest, and improved priority for active travel movement.
- To better protect and enhance local greenspaces and green networks as conduits for the movement of people, wildlife and flood waters particularly along and across watercourses and woodland areas.

CANNICH

• To diversify local employment opportunities taking advantage of Cannich's Western Glens visitor gateway location.

- To support further central housing development in parallel with this diversification including at the land adjoining the camping and caravan site.
- To respect the physical constraints of the settlement by not supporting development within or adjacent to the fluvial flood risk areas and not allowing sporadic development up the glen sides.
- To support a scale of development that helps sustain local facilities but doesn't overburden the limited capacity in the local water and sewerage network.
- To better protect and enhance local greenspaces and green networks as conduits for the movement of people, wildlife and flood waters particularly along and across watercourses and woodland areas.

FARR AND INVERARNIE

- Future development must only add to the existing clusters at Farr and Inverarnie. The limits of development should be Croftcroy junction to south and the Hall to north.
- Land immediately adjacent to the East of Farr hall must be safeguarded for community/local retail use such as a village store and/or coffee shop.
- Deliver new affordable housing including within suitable small-scale developments.
- Risk of flooding will limit further development in certain areas particularly further westwards towards the bridge over River Nairn and the area surrounding the bridge over the River Farnack.
- Safeguard areas of woodland from development.
- Create a continuous active travel connection between the two settlements.
- Continue to develop community and recreational facilities and enhance the environmental features within the community-owned School Wood and Milton Wood.
- Enhance green and blue networks as part of retaining woodland and creation of active travel connections.

FOYERS

- Use the Stratherrick and Foyers Community Action Plan as a material consideration in determining planning applications and investment decisions.
- Deliver well designed affordable housing to encourage families and young people to the area and strengthen the community and demand for its facilities.
- Need for better roads maintenance and signage together with enhancements to safe walking and cycling routes to schools.
- New housing should to be located close to facilities, such as the school and shop, or added to existing clusters of development.
- Support the renovation/redevelopment of Boleskine House to help boost the local economy.
- Make the most of the commercial and active travel opportunities arising from the National Cycle Network running through the village.
- Protect and enhance all areas of woodland from development.
- Enhance multi-use green and blue networks, such as the area around River Foyers, and nature-based solutions, such as retaining natural buffer strips, to protect the water environment and support biodiversity.

GORTHLECK

- Use the Stratherrick and Foyers Community Action Plan as a material consideration in determining planning applications and investment decisions.
- Housing development should continue to be focused in close proximity to the school and typically be infill between existing clusters of development.
- Further development along side roads will be required to upgrade the roads to adoptable standards.
- Preserve public views across Loch Mhor.
- Safeguard the pockets of native and ancient woodland from development.
- Enhance multi-use green and blue networks, such as watercourses and Loch Mhor, and nature-based solutions, such as road side verges and planting, to protect the water environment and support biodiversity.

INCHMORE

- To direct any further, smaller scale housing and other development to land adjoining the former village hall and away from more steeply sloping and visually prominent land to the south, and land subject to unacceptable flood risk to the east.
- To limit the scale of any development to the capacity of local infrastructure in particular the capacity of junctions onto the A862, of Kirkhill Primary School and of Glen Convinth Water Treatment Works.
- The settlement has very limited public greenspace and therefore the few attractive features such as the former school playing field, road side verges and woodland clusters should be protected from future development proposals.
- To secure land safeguards and/or developer contributions towards the Inchmore section of the Beauly to Inverness strategic active travel link.

TOMICH

- To protect the architectural character of the settlement which is strongly linear in form.
- To support limited expansion opportunities that are in keeping with maintaining and if necessary then extending this linear form.
- To support the further expansion of visitor facilities at Tomich particularly where these are also available to the permanently resident population.
- To better protect and enhance local greenspaces and green networks as conduits for the movement of people, wildlife and flood waters particularly along and across watercourses and woodland areas.

WHITEBRIDGE

- Use the Stratherrick and Foyers Community Action Plan as a material consideration in determining planning applications and investment decisions.
- Support the hotel to continue to provide an important role within the community.
- Ensure development respects the setting of the Listed Buildings.
- Safeguard the pockets of native and ancient woodland from development.
- Enhance the role of watercourses, including River Fechlin, as part of green and blue infrastructure to deliver nature-based solutions to tackling flooding, and wetlands and natural buffers.

ECONOMIC DEVELOPMENT AREAS (EDAs):

CASTLE STUART



| Summary of Issues Raised | Recommendations & Reasons |
|---|---|
| in Comments (2 | |
| comments) | |
| Placemaking Priority to preserve and enhanced green networks throughout the site. Also, developer requirements for protection of the woodland and in relation to the nearby environmental designations (effects on SPA to be considered as part of HRA). Similar comments made by RSPB. | Developer requirements added as per NaureScot's comments: preserve and enhanced green networks; protection of the woodland; avoid impact on environmental designations (effects on SPA to be considered as part of HRA) |

| EDA Name | Acceptable Use(s) |
|---------------|----------------------------|
| Castle Stuart | Business, Leisure, Tourism |

FORT GEORGE



Summary of Issues Raised in Comments (4 comments)

NatureScot highlight opportunities for Placemaking Priorities to be included to provide benefits for people as well as protecting the features of the designated sites. Recommend Semi-Natural Inventory Woodland on site is highlighted. Developer requirements should include: preserve and enhance woodland from development and use them as green networks for biodiversity and active travel (similar comments made by RSPB); restrictions of development near the coastal edge south of the B9006; avoid adverse impact on integrity of SPA and SAC and negative effects on GCR and SSSI.

Historic Environment Scotland supports the MIR position in recognising the heritage value and the need to consider future uses. Confirm site is now Listed. Data held on potential climate change impacts on the site. Supportive of housing within the potential mix of uses as other examples show how it can work. Keen to work with stakeholders to support suitable future use.

DIO (landowners) support the aspirations of the Plan but requests: greater flexibility, particularly housing being part of the mix of uses (it is currently closest to residential use); highlight it is Listed rather than a Scheduled Monument; clarify there are two vehicular access points to the Fort; 0.6ha site to the east should also be allocated. Viable uses will help to ensure coastal maintenance works can be undertaken.

Recommendations & Reasons

Add requirements: assessment of impacts of coastal erosion may affect developable areas, particularly along edge south of the B9006; preserve and enhance woodland from development and use them as green networks for biodiversity and active travel; avoid impact on environmental designations (effects on SPA to be considered as part of HRA).

Inclusion of Housing as part of the mix of uses as, at this early stage, the flexibility ensures all possible options can be explored. Industrial uses have also been included to reflect existing uses south of the firing range.

| EDA Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------|-------------------------------|-------------------------------------|
| Fort George | Housing, Community, Business, | None (long term housing potential) |
| | Tourism, Industry, Retail | |

INVERNESS AIRPORT BUSINESS PARK



Summary of Issues Raised in Comments (3 comments)

Inverness Airport Business Park Limited (IABP) supports the allocation of its site but objects to Placemaking Priority relating to developer contributions for active travel provision because there is already an agreement in place. IABP questions necessity of new allocation supporting expansion of Dalcross industrial estate given the approved IABP includes industrial uses. If it is allocated then to have IABP support, developer contributions will be required to contribute towards the investment in infrastructure which was made to accommodate growth in the area.

NatureScot recommend that these woodland interests should be excluded from the developable area and related developer requirement. Also recommend additional Placemaking Priority relating to enhancement of multi-use green and blue networks which connect to both allocations, Tornagrain new town and rail and air travel options. Badger present so protected species survey required. Mitigation identified through HRA must be included. IAO2 - opportunities to create multi-use green networks and to take advantage of the coastal views through development at a landscape scale.

Network Rail highlight the proposals to deliver the new railway station and enhanced active travel provision.

Recommendations & Reasons

To allocate both sites for commercial uses as per the MIR. IABP is a long-established commercial development hub and benefits from significant infrastructure in place. Dalcross Industrial Estate is virtually full, and its allocation could help address the lack of industrial space in certain parts of the Plan area, particularly if speculative units can be built. Development may also help to address surface water drainage issues at the industrial estate and the lack of active travel provision. It is not considered reasonable nor appropriate to seek contributions for infrastructure provision which was agreed to support the IABP.

As per NatureScot's request, developer requirements will be added for: multi-use green and blue networks to key destinations; woodland protection; protected species survey; mitigation identified for European Sites identified through HRA.

| EDA Name | Acceptable Use(s) |
|----------------------------|-----------------------|
| Inverness Airport Business | Business and Industry |
| Park | |
| Dalcross Industrial Park | Industry |
| Expansion | |

WHITENESS



| EDA Name | Acceptable Use(s) |
|-----------|-------------------|
| Whiteness | Industry |

Summary of Issues Raised in Comments (4 comments)

- Landowner at the time of the MIR commented alongside the industrial use, requests the site is allocated for Mixed Use development (housing/leisure) because: assists with addressing climate & ecological emergency; regenerate long term vacant site; utilises existing infrastructure; will provide employment and range of facilities to serve new community; delivers a 20 min neighbourhood; active travel connections to surrounding area; renewable energy can be considered; no evidence that the site should be safeguarded for industry; Plan recognises importance of tourism/leisure to economy; addressing housing demand; renewal application pending (now Minded to Grant); inconsistent with HwLDP; no significant environmental impacts. Also concerned about strategic environmental assessment inaccuracies - water environment has been assessed and development will not have any residual significant adverse effects; mixed use development will have positive impact on openspace, active travel provision, public transport; meets the six qualities of Designing Places; renewal of application demonstrates viability.
- NatureScot comments that site very challenging due to its location, plus potential and actual impacts on protected areas. Significant coastal erosion issues which may need addressed but will impact on designations. If this EDA is taken forwards into the proposed plan, effects on these European sites should be assessed in your HRA. Confirmation that the Moray Firth 'proposed' SPA has now been designated.
- RSPB Scotland support the Placemaking Priorities acknowledging the designations but highlight opportunity to incorporate biodiversity enhancement measures.
 Support Industrial rather than mixed use development.
- Individual questions retention of Whiteness as an EDA because: significant infrastructure issues; significant flooding and coastal maintenance issues; better alternative sites; viability issues; environmental issues.
 Better for it to be flagship ecological restoration initiative.

Recommendations & Reasons

To continue to allocate Whiteness for Industrial uses because the site has changed ownership since the comments were made on the MIR by the previous owner. The new owners have confirmed plans for energy sector related development. This is consistent with industry data which identifies the site's strategic importance.

The environmental concerns are recognised and appropriate developer requirements relating to the environmental designations, biodiversity enhancements where appropriate, and coastal erosion will be added.

Within the Plan's revised Spatial Strategy, Whiteness forms part of the Strategic Renewable Energy Zone which is now identified.

APPENDIX 2: DINGWALL AND SEAFORTH COMMITTEE:

SETTLEMENTS CONON BRIDGE



Summary of Issues Raised in Comments (8 comments)

- RSPB seeks commitment to safeguard bird interest at Conon Islands SAC/SSSI.
- Respondent seeks firm reference to Muir of Ord to Conon Bridge Active Travel (AT) link as part of Dingwall Academy route (feasibility evidence supplied).
- Developer of CB05 asserts site is viable and an application will be lodged imminently.
- Developer of CB02 asserts site is viable, part serviced and in discussions with owner.
- Owner of CB01 and CB02 asserts sites are viable, serviceable and will work with community.
- NatureScot seek reference to role of woodland Green Networks as AT routes, as natural flood defences, and heritage assets.

- Taking account of these development factors we believe that the Plan should reassess and then reduce its existing development site commitments. Land at Braes of Conon is part serviced, has a willing landowner, an attractive outlook, likely developer interest, and is in reasonable proximity to the village's principal shop and primary school and is therefore allocated for new housing development. Flood risk and other issues are capable of mitigation. Sites at the former fish processing factory and public house have received recent planning permissions and the related flood protection scheme will be progressed. The derelict former petrol station has flood risk issues but is central, brownfield and would lead to a marked environmental improvement.
- Draw in Settlement Development Area (SDA) and don't confirm CB05 and CB07 because sufficient better sites allocated for development.
- Local bird interests are already protected under other existing legislation and development plan policy.

- To support limited growth hand in hand with a programmed increase in local primary school capacity.
- To undertake flood defence works that will reduce the risk of flooding to existing properties and potential redevelopment sites.
- To locate new development closest to the rail halt, school and commercial facilities notably at Braes of Conon.
- To seek developer contributions and other funding towards the provision of an active travel link between Conon Bridge and Muir of Ord.
- To protect and enhance local woodland Green Networks as active travel routes, as natural flood defences, and as heritage assets.

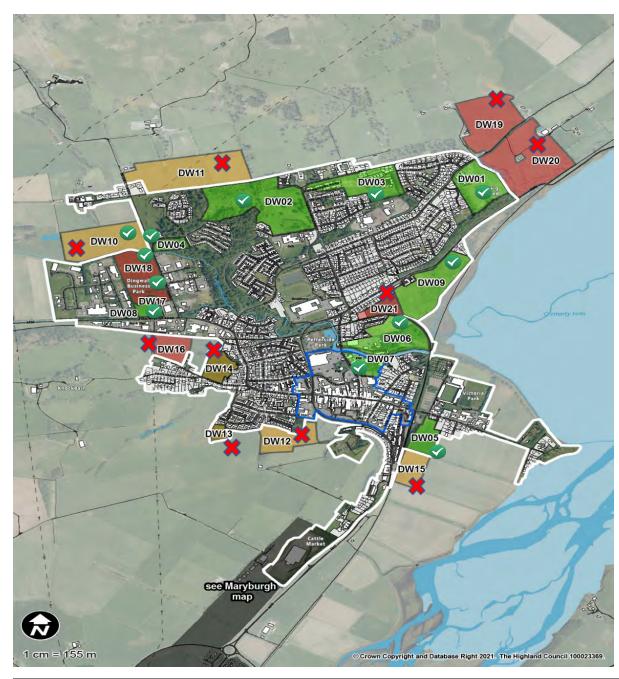
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------------------------|--------------------------------------|-------------------------------------|
| Former Petrol Filling Station | Housing | 10 |
| Braes of Conon (North) | Housing | 27 |
| Former Public House and | Housing | 21 |
| Adjoining Land | | |
| Braes of Conon (South) | Housing, Community, Business | 50 |
| Former Fish Processing Site | Housing, Community, Business, Retail | 72 |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



DINGWALL



- NatureScot would like a placemaking priority included which recognises the
 importance of blue and green networks especially along River Peffery. Seeks
 developer requirements for woodland protection at DW02 and active travel
 links at DW02 and DW07. Effects on Cromarty Firth SPA should be
 considered via HRA.
- Request for an additional allocation on land between DW12 and DW13 as a community woodland at Knockbain Farm.
- Dingwall Community Council seeks the reinstatement of Kinnardie Link Road into the Capital Programme; The link between St Andrews Road and Chestnut Road will not provide equivalent traffic management measures. With exception of DW10 and 11, considers all other alternative and non-preferred sites should be excluded from Plan and is content with all preferred sites being allocated. Does not support Housing as a use on DW05. Supports Community Use (District Park) on DW09 but should not involve significant building.
- Sawmill owner objects to DW03 being used for further housing due to proximity to his business and potential future bad neighbour issues.
- Some objections to DW04 due to flood risk, overgrown site and potential disturbance of protected species. Dingwall CC supports allocation of site.
- Landowner supports retention of DW05. Objections include surface water flooding, poor access, loss of biodiversity. Also seeks support for having DW15 as an extension to the site at DW05, for housing and business uses. Reasons include it sits outwith flood risk, is not constrained by Kinnardie Link Road and has good proximity to the railway station for commuting and freight. Objections to DW15 based on biodiversity loss.
- Objection to DW06 due to flood risk, coastal erosion, biodiversity loss.
 Landowner supports retention of site but seeks housing as an additional land use.
- Support for retaining DW08 including from Dingwall Community Council.
- Landowner objects to DW10 not being included as it is currently allocated, and proposals have been drawn up for site. Site has been constrained by Kinnardie Link Road and River Peffery Flood Protection measures.
- Landowner objects to site not being included because it is an existing
 allocation and has planning permission. Development is being constrained
 due to a planning condition that no development can commence until Ph1 of
 Kinnardie Link Road is complete. Landowner states this is outwith their
 control.
- Landowner seeks support for DW16. Considers it would round off settlement, is in close proximity to the town and has ease of access to services.
- Landowner seeks support for DW19. Asserts viability and deliverability.
- Landowner seeks support for DW20. Considers the sites as a logical direction for future expansion of the town.

• The proposed allocations are supported because: DW01, DW02, DW03 and DW04 are all viable, central housing sites for the short to medium term, with development either already happening on site or active interest in them. Will also aide progress with the provision of the road link between St Andrews Road and Chestnut Road. DW02 will include a developer requirement for primary school drop off/parking. DW05 is a central site with good proximity to the rail station which can provide some housing subject to flood risk assessment. DW06 and DW07 are existing allocations for B/I/C which can be retained as viable sites. Northern section of DW06 is at risk of flooding and is not suitable for housing. Include developer requirements on active travel and green networks. Following Member discussion, it is recommended that DW08, DW17 and DW18 be amalgamated into one site allocated for Business/Industrial Uses. All development proposals will be subject to Flood Risk Assessment and may require the River Peffery Flood Protection Scheme to be in place for some sections of the site to be developed. DW09 will provide greenspace for recreation and visitors and will augment the green network. A modified and reduced in size DW10 is supported for community use, as a potential site for the replacement St Clements School.



- Other sites are not supported because: The remainder of DW10 is not required for a replacement St Clements School and is not supported for housing development due to lower lying sections of site being at risk from flooding from the river. DW11 is a large edge of settlement site which may provide for a longer-term direction of growth for housing once other more central sites are developed. Equally DW19 and DW20 feel more removed from the town and are not required whilst there are other more viable, central options for housing sites. DW12 is constrained by the steepness of the site and DW14 and DW16 are constrained by a single track road access. DW13 is not a large enough site to be shown as an allocation however it could stay within the SDA and provide an opportunity for a small amount of infill development. The eastern section of DW21 is at risk of flooding and is considered unsuitable for housing.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.
- No additional sites consultation is being undertaken for new sites proposed, however reference will be made in settlement text and placemaking priorities to the potential for a new community woodland at Knockbain Farm.

| • | Objections to DW21 include waterlogged ground and adjacent houses been |
|---|---|
| | affected by flooding and drainage issues. Landowner asserts that these issues |
| | can be dealt with. |
| | |

- Deliver improved transport infrastructure including the Kinnardie Link Road and the completion of the link between St Andrews Road and Chestnut Road
- Improvement of active travel routes in the town and intra-settlement links between Dingwall and Evanton and the Peffery link to Strathpeffer
- Provide additional car-parking and drop-off points at the Primary School
- Protect and enhance the Conservation Area and continue with the improvement of historic buildings on the High Street.
- Safeguard and enhance blue and green networks especially along River Peffery
- Potential for a new community woodland at Knockbain Farm.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing |
|-----------------|---------------------------------|----------------------------|
| | | Capacity |
| DW01 | Housing | 28 |
| DW02 | Housing | 98 |
| DW03 | Housing | 38 |
| DW04 | Housing | 40 |
| DW05 | Business, Tourism, Community, | 10 |
| | Housing | |
| DW06 | Business, Industrial, Community | n/a |
| DW07 | Business, Retail, Community | n/a |
| DW08 DW17 DW18 | Business, Industry | n/a |
| DW09 | Community | n/a |
| DW10 (modified) | Community | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



MARYBURGH



Summary of Issues Raised in Comments (10 comments)

- RSPB seeks text to safeguard and enhance Conon Islands SAC/SSSI.
- Owner of part of MB05 seeks Housing allocation because of quantitative demand, serviceable, green networks can be created, next to proposed employment area.
- Brahan Estate support MB05 & MB06 for Housing (350 units) and other uses – suggest standalone first phase of 30 units, road ransom issue being resolved with new A835 access for longer term phases, possible safeguard for new primary school.
- Objection to MB06 woodland and habitat loss, inadequate school capacity, loss of safety and quality of Active Travel (AT) route, excessive scale.
- Historic Environment Scotland seek removal of Designed Landscape designation component of sites MB05 and MB06.
- NatureScot seeks better safeguarding and enhancement of blue and green networks (GNs), natural flood measures, MB04 to consider effects on SPA, MB05 amended to safeguard Inventory woodland & consider effects on SPA.
- Landowner/developer supports MB04 for employment uses as agricultural enterprises hub but also seeks MB07 for additional layout flexibility and users, helps viability, buildings already at that elevation, happy to commit to structural planting.
- Maryburgh Community Council objects to MB04 and MB07 - adverse visual impact of industry, loss of 'village life', loss of good farmland, insufficient good housing, lack of business unit demand as evidenced by Dingwall Business Park, lack of school capacity, coalescence of Dingwall and Maryburgh, increased HGV movements, loss of old Maryburgh to Dingwall walking route, lack of local GP practice.

- Two smaller housing sites close to the Maryburgh Roundabout and at Birch Drive the latter of which had a previous planning permission be reaffirmed but otherwise major housing growth should be restricted because of viability, environmental and infrastructure capacity issues. The project to enhance a community hub is worthy of reference.
- Land for industrial and business uses between the Dingwall Marts and the trunk road roundabout is proposed for business and industrial development to allow the option of local employment which should be more sustainable in that local jobs could reduce the village's dependence on longer distance commuting. The land south of the former primary school benefits from a recent planning permission and is under construction.
- Additional reference to safeguarding and enhancing AT & GN connectivity.

- To limit the scope for new housing development sites to the land that is least constrained and to local infrastructure capacity notably the new primary school.
- To explore the potential for expanding local employment opportunities by allocating land between the trunk road roundabout and the Dingwall Marts.
- To otherwise respect the trunk road, side road, woodland and flood risk constraints that inhibit expansion.
- To safeguard and enhance active travel and green network connectivity.

Recommended Development Sites

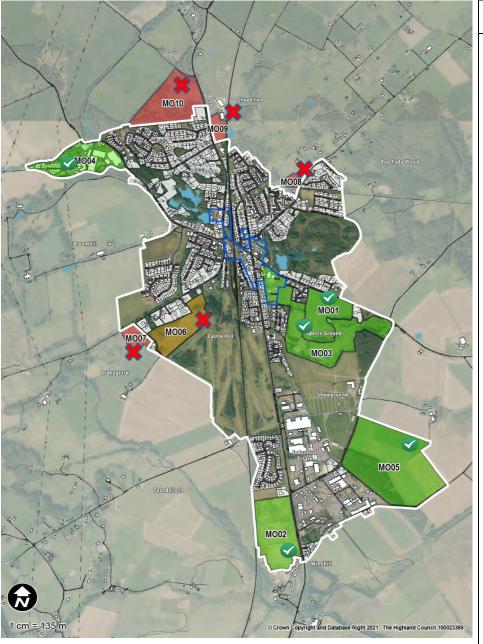
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------------------|--------------------|-------------------------------------|
| Land West of Maryburgh | Housing | 15 |
| Roundabout | | |
| Land at Birch Drive | Housing | 30 |
| Northern Part of Former | Community | n/a |
| Primary School | | |
| Land North of Maryburgh | Industry, Business | n/a |
| Roundabout | | |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



MUIR OF ORD



Summary of Issues Raised in Comments (18 comments)

- Requests for firm commitment to complete Active Travel (AT) link to all high schools specifically Muir of Ord to Conon Bridge link because it would improve teenage health and save school transport costs.
- Developer of MO08 seeks allocation because close to facilities, self build opportunity, previous lapsed permission, pending application, visually self contained, and quantitative requirement.
- Landowner/developer/agent of MO07 seeks allocation because close to facilities, quantitative requirement, self build opportunity, would accept Settlement Development Area (SDA) enclosure, natural heritage impacts can be mitigated, degraded previously tipped land.
- Muir of Ord Rovers object to Business use on any current sports use land.
- Landowner supports retention of MO02 because effective, close to employment, happy with proposed uses, site recently marketed.
- Landowner supports retention of MO09 because close to centre of settlement and its facilities, good travel connectivity, effective, serviceable, could offer self build plots or accommodation for the elderly.
- Landowner supports retention of MO10 because effective, serviceable, could offer self build plots and accommodation for younger people, used to be fly tipped so environmental improvement to develop it, best woodland can be kept, as close to centre as MO02.
- Muir or Ord (Tarradale) Community Council –
 wants AT links in place before any development
 of MO01, MO03 should be for Community use
 only, oppose MO06 and MO07, query why
 MO08-MO10 are non-preferred if only about
 distance when Cairns supported.

- Reallocate the majority of previously identified development sites except at Broomhill and Ord Hill where the previous permissions are almost complete and at Corrie Road where land has not come forward for development. Land at Lochan Corr and South of The Cairns has permission and firm development interest and are respectively, close to community facilities and employment opportunities. Central community and recreational facilities would benefit from safeguarding, possible reconfiguration to improve active travel access to them and enhancement. Industrial areas on the margins of the town provide valuable local employment opportunities and their expansion should be supported.
- Add references to safeguard and enhance AT and green network connectivity.
- Other housing options are not required in quantitative terms and/or

- Landowner seeks SDA extension at Hawthorn Rd for family self build because good fit with landscape and settlement pattern.
- Historic Environment Scotland seek in-situ safeguarding and setting setback from monument within MO02.
- Diageo seek safeguard of distillery operation, expansion opportunities and protection from additional sensitive receptors closeby that might inhibit expansion.
- NatureScot seek nature-based solutions to AT links and SuDS – e.g. Conon Bridge AT link. Seek developer requirements for woodland protection and AT links for MO02 and MO01. MO05 seek woodland retention and setback for landscape and nature conservation reasons.

- suffer from woodland, drainage, road access, ground conditions and/or peripherality constraints.
- Appropriate and necessary setbacks between new development and existing features will be addressed in the specifics of individual site developer requirements.

- To support the continued growth of the town in locations that best support local facilities and promote sustainable travel patterns.
- To secure developer contributions to help resolve remaining infrastructure and facility deficiencies.
- To reallocate existing development sites near Lochan Corr and The Cairns because they are closest to facilities and offer the prospect of sustainable travel.
- To safeguard and enhance recreational and other community facilities at the heart of the village.
- To seek developer contributions and other funding towards the provision of an active travel link between Windhill and Tarradale Mains, and also between Conon Bridge and Muir of Ord.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------------------|---------------------------|-------------------------------------|
| Lochan Corr | Housing | 104 |
| South of Cairns | Housing, Business, Retail | 60 |
| Recreation and Leisure | Community | n/a |
| Areas | | |
| Glen Ord Distillery | Industry, Business | n/a |
| Land East of Industrial | Industry, Business | n/a |
| Estate | | |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



NORTH KESSOCK



Summary of Issues Raised in Comments (30 comments)

- Objections to NK01 because of adverse impact on greenspace, trees (trees secured by permission), core path views, natural heritage, prime farmland, lack of need/demand, no local employment, road safety, of village character, legal agreement prevents other development until golf course developed, road capacity, privacy / amenity, property prices, construction disturbance, gas pipeline proximity, drainage/flooding, sewerage capacity, pond.
- Objections to NKO2 because ugly, loss of village character, unneeded because of lower commuting, better alternative sites (Tore, Inverness, existing A9 service areas), additional traffic and pollution, litter, anti-social behaviour, road safety, blocks cycle route, gas pipeline, land north of A9 impracticable because of gradient and poor visibility, too small for meaningful modal shift, offer of bigger, developer funded site at Tore which will intercept more journeys.
- Objections to NK05 because loss of prime farmland, core path views, natural heritage, infrastructure capacity, lack of need/demand and local jobs, road safety, legal agreement prevents other development until golf course developed, loss of privacy / amenity, property depreciation, construction phase impacts, impact on pond, drainage/flooding, sewerage capacity.
- Objections to NK04 because loss of farmland, core path views, natural heritage.
- Lack of local public consultation on proposals
- Support for NK02 (esp for electric vehicles with charging or retail units), NK03 (but not for caravans and incorporate path) & generally for retail & sheltered housing.
- Any new housing should be low carbon.
- Extend 50mph limit to North Kessock A9 junction.
- NatureScot wants enhanced Green Networks (GNs) reference, woodland issue with NK02
- Landowner wants 150 houses and other mixed uses on bigger NK01 because site effective, and legal agreement can be modified.

Recommendations & Reasons

- A limited development would be acceptable on land to the west of the village. Because it lies at the northern gateway to the City of Inverness, North Kessock could also play a strategic role in managing travel and visitor impacts by accommodating a Park and Ride facility and a campervan servicing site. Land at Bellfield Farm (East) benefits from a previous development allocation and is unlikely to be feasible for business/commercial development in connection with a golf course. It may still support commercial or community use together with limited housing development. Land adjoining the A9 junction is the optimum location for an interceptor park and choose/ride site to encourage changes to more sustainable travel modes. Similarly, the existing A9 northbound car park and adjoining land is underutilised and could better manage the impacts of campervan visitor demand.
- Further development allocations are not justified in infrastructure, facility and environmental capacity terms.
- Woodland and other site-specific constraints to the allocated sites can be mitigated by implementation of defined developer requirements for each site.
- Add reference to safeguard and enhance green network and active travel connectivity.

- Landowner wants petrol filling station, retail and business on NK02 because it believes there are better Park & Ride sites.
- Landowner wants 100 houses and other mixed uses on NK05 because it is effective, there is a quantitative need and constraints can be mitigated.
- Knockbain Community Council supports NK01 for specialist/affordable housing, business and retail if infrastructure capacity improved. Opposes NK02 because of resident objections. Objection to NK03 unless amenity, pollution, management and boundary issues addressed. Objection to NK05 for reasons expressed by residents. Desire outdoor leisure facilities for tourists/locals.
- One view that North Kessock should be dropped 2 places in the Settlement Hierarchy because reached it has reached its physical limits and has no natural infill sites

- To support limited, mixed use expansion to the west of the settlement.
- To secure infrastructure improvements that play a strategic role in managing travel and visitor impacts.
- To presume against infill development on greenspaces within the village where they offer amenity, recreational and/or nature conservation value.
- To safeguard and enhance green network and active travel connectivity.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------|--|-------------------------------------|
| Bellfield Farm | Housing, Community, Business | 80 |
| Land Adjoining A9 Junction | Community (Park & Ride/Choose), Retail | n/a |
| A9 Northbound Car Park | Business | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.





Summary of Issues Raised in Comments (8 comments)

- Landowner support for retention and development of TR01.
- Support for Park & Ride (P&R) site at Tore not at North Kessock because former will capture more people and decrease car miles.
- NatureScot seek reference to need to protect and enhance local blue and green networks. Also woodland retention and setback requirements for TR01 and TR02.
- Developer seeks development of TR04 for 200 bay P&R site, new primary school, retail, community uses, business development, and industry, new trunk road junction plus 1,000 homes because it will provide local employment opportunities and therefore allow sustainable economic growth, new infrastructure capacity can be created by the developer, P&R safer and more effective at Tore, marketable and strategic location, adopted plan allocation at Tore, Active Travel (AT) including footbridge improvements will be developer funded, all other constraints can be mitigated, development effective and viable.

Recommendations & Reasons

- Only promote very limited infill
 development at Tore because of the Plan's
 proposed spatial strategy of directing
 significant development to sustainable and
 viable locations. Land at Woodneuk
 benefits from a recent planning
 permission, would infill a cluster of existing
 development and is close to the primary
 school. Tore is a competitive location for
 industrial and storage uses and existing
 enterprises may require to be expanded.
 Treed land north of the grain mill has
 potential to absorb expansion of existing
 operations including larger scale buildings
 into the local landscape.
- There is no quantitative requirement for the scale of expansion proposed and the necessary upgrading of infrastructure and community facility capacities is very likely to be unviable.
- Add reference to need to safeguard and enhance local green network and active travel connectivity.
- Other comments can be addressed by sitespecific developer requirements.

- To only support limited infill development at Tore.
- To control that expansion to the limited capacity of local primary school and sewerage facilities.
- To define a development envelope that supports the infilling of the clusters of buildings that make up the settlement of Tore.
- To safeguard and enhance local green network and active travel connectivity particularly across the major roads that currently inhibit movement.

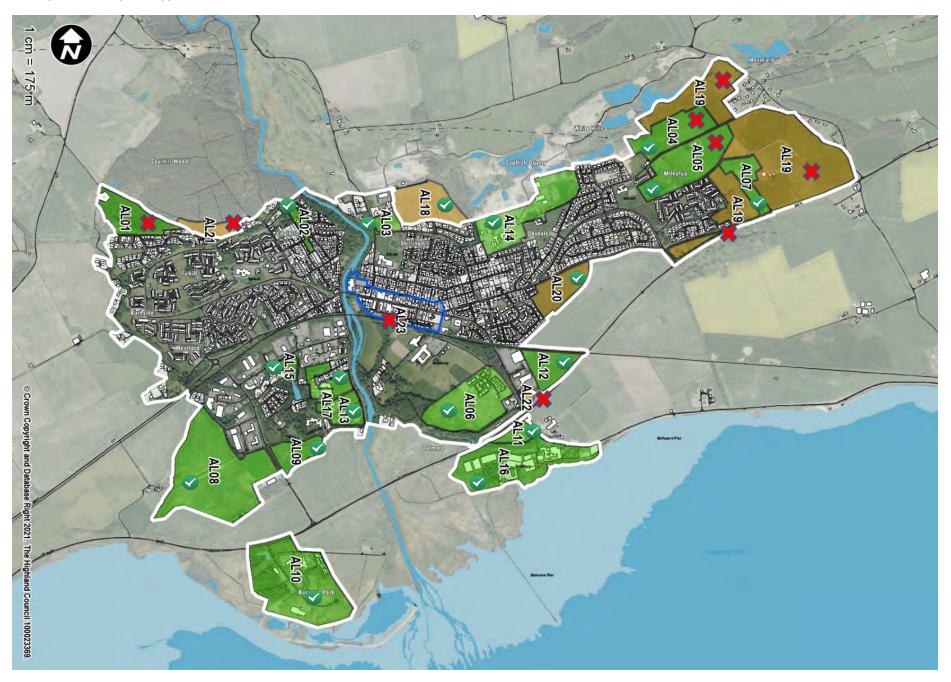
Greenspaces Map

There are no greenspaces proposed for the Tore settlement.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|------------------------------|--------------------|-------------------------------------|
| By Woodneuk | Housing | 14 |
| Land North of the Grain Mill | Industry, Business | n/a |

APPENDIX 2: EASTER ROSS COMMITTEE: SETTLEMENTS

MAIN SETTLEMENTS: ALNESS



Summary of Issues Raised in Comments (13 comments)

- NatureScot supports the placemaking priority to maintain quality green spaces and a high quality rural setting but recommends amending text to promote enhancement. Suggest that placemaking priorities would benefit from additional emphasis on the multi-uses of green networks, including active travel routes between proposed sites to existing green networks and adding active travel routes from the town centre to the coast. NatureScot is not supportive of either ALO1 or AL21 due to the sites being predominantly Ancient Woodland Inventory (AWI) and Scottish Semi-Natural Woodland Inventory and the associated biodiversity and landscape interests.
- Settlement text should highlight the importance of the growth of Teaninich Distillery in bringing significant social and economic benefits to Alness in terms of tourism, inward investment and employment opportunities.
- Support for retaining AL02.
- Agent support allocating AL03 for housing and would support land at AL18 being included as part of a wider masterplan.
 Both sites are linked in terms of access and infrastructure.
- Some concern about the extent of proposed development at Alness East (AL04, AL05, AL07, AL19) in terms of pressure on school and healthcare facilities in an already deprived area.
- Owner of site AL09 supportive of retaining allocation for Mixed Use (Business/Tourism).
- NatureScot would like developer requirements included for coastal erosion, flood risk, and active travel on AL10. HRA will also be required due to proximity to Cromarty Firth SPA. RSPB consider it should be identified as greenspace with potential to maintain and enhance biodiversity.
- Support for retaining AL13 for Business Use and AL15 for Industry.
- Support for retaining AL17 for industry.
- No comments received for AL06, AL08, AL11, AL12, AL14, AL16, AL20, AL22, AL23

Recommendations & Reasons

• The proposed allocations are supported because: housing land at ALO2 Willowbank is partly developed and ALO6 Dalmore is actively being developed. Land at ALO3 and AL18 Crosshills and AL20 Obsdale Road are available for housing development and have no major constraints. Land at Alness East has the ability to continue to deliver housing in the short to medium term, however there are concerns about road safety both in terms of pedestrian/active travel around existing streets and cars using the junction at Rosskeen to get onto the A9. It is recommended that two modified allocations are shown in the proposed plan. The site outlined in blue would allow for the delivery of 73 houses which are the remaining units covered by extant planning permissions and associated Transport Assessment. A second allocation outlined in red on part of ALO4 could provide up to 50 units. ALO7 already provides space for community uses and will continue to be allocated to support those continued uses. There are a range of active and viable sites allocated for Business, Industrial, Commercial, Retail and Tourism uses in the south of the settlement (ALO8, ALO9, AL10, AL11, AL12, AL13, AL15, AL16, AL17) on either side of the A9. These will help to support and consolidate existing businesses and provide opportunities for new or expanding businesses. AL14 supports the continued allocation of Caplich Quarry.



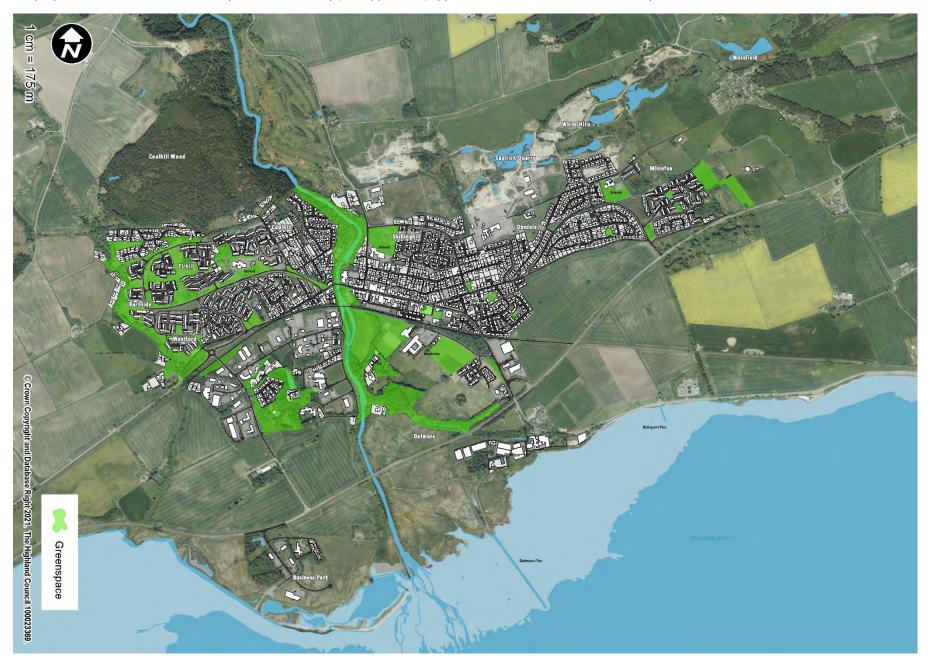
- Other sites are not supported because: AL01 and AL21 are constrained by woodland, greenspace and landscape interests. AL23 would provide less than 10 houses therefore is generally of a scale that it would not be allocated. However it sits within the SDA and would be suitable for small scale infill development. Whilst it is recognised that Alness East could provide a long term direction of growth for the town, the remainder of AL04 and AL05 as well as AL19 are constrained by road infrastructure, in particular the requirement for a new trunk road junction onto the A9 at Rosskeen. Settlement text will reflect that Alness East would be an appropriate longer-term expansion of the town subject to the necessary improvements to infrastructure. The remainder of the land at Alness East will remain in the SDA however no development should take place there prior to a new transport assessment being completed. Land at Blackmuir in between AL07 and the western boundary of houses at Milnafua will remain in the SDA.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

- Preserve attractive setting of Alness.
- Protect and enhance the vibrant town centre.
- Increase capacity in local primary schools.
- Improve and expand on active travel links between sites and between the town and the coast.
- Maintain and enhance the high quality rural setting and quality green spaces
- Protect and enhance local Green Networks as active travel routes.

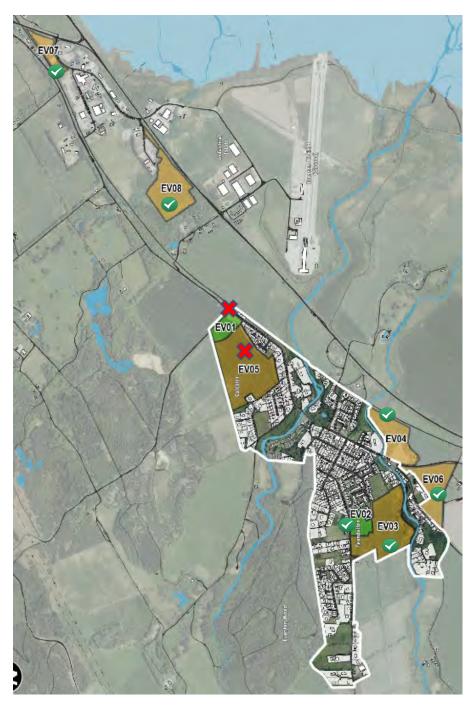
| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--|----------------------------|-------------------------------------|
| AL02 Willowbank Park | Housing | 5 |
| AL03 and AL18 Crosshills | Housing | 25 |
| AL04 Whitehills and AL05 Milnafua Farm | Housing | 123 (73 & 50) |
| (Modified boundary) | | |
| AL06 Dalmore | Housing | 100 |
| AL07 Achnagarron Farm | Community | n/a |
| AL08 West and South of Dail nan Roca | Business/Commercial | n/a |
| AL09 South of Teaninich Road | Business/Tourism | n/a |
| AL10 Alness Point | Business/Industry | n/a |
| AL11 Field to North West of Dalmore Distillery | Business/Industry | n/a |
| AL12 Invergordon Road East | Retail | n/a |
| AL13 Averon Way | Business | n/a |
| AL14 Caplich Quarry | Industry | n/a |
| AL15 | Industry | n/a |
| AL16 | Industry | n/a |
| AL17 | Industry | n/a |
| AL20 | Housing/Business/Community | 50 |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



EVANTON



Summary of Issues Raised in Comments (4 comments)

- NatureScot would like the Ancient Woodland Inventory and Scottish Semi-Natural Woodland Inventory which is throughout the settlement, noted in the Placemaking Priorities.
- Network Rail notes the aspiration to reopen the former railway station. This would however be subject to STAG appraisal to assess viability and should be referred to in the Plan.
- Suggestion made for improvements to active travel paths out with Evanton heading towards Alness.
- No comments received for EV01 & EV05.
- No comments received for EV07 & EV08.
- For EV02 & EV03 NatureScot requests developer requirements to highlight woodland interest on site and to protect and enhance green network.
- EV04 and EV06 Landowner/agent request to continue to allocate both sites for housing due to deliverability, proximity to major employment centres, sustainable location and suitability of Evanton housing growth.

Recommendations & Reasons

- The proposed allocations EV02 and EV03 are supported because both sites benefit from planning permission and the site is actively being developed. Amend boundary to amalgamate into one site not two. Developer requirements will refer to phasing as per planning permission 19/05404/FUL. Land at EV04 and EV06 will provide centrally located sites for housebuilding over the plan period. The retention of business and industrial land allocations at EV07 and EV08 will continue to provide valuable local employment opportunities.
- Other sites are not supported because: Viability and likelihood of EV01 and EV05 sites being developed is unclear, sufficient viable housing land at Teandallon which benefits from planning permission.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

- Aspiration to re-open the rail halt, subject to STAG appraisal.
- Improve internal road provision, particularly along Swordale Road where capacity issues exist.
- Support active travel links to Alness.
- Support active travel links over the River Sgitheach and Allt Graad.
- Protect the Ancient Inventory Woodland and Scottish Semi-Natural Inventory Woodland.
- Address limited capacity at Kiltearn Primary School.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|----------------------------------|--------------------|-------------------------------------|
| EV02 & EV03 Teandallon East | Housing | 56 |
| EV04 Southeast of Evanton Bridge | Housing | 5 |
| EV06 Drummond Farm | Housing, Community | 5 |
| EV07 Airfield Road | Business | n/a |
| EV08 Evanton Industrial Estate | Business, Industry | n/a |

INVERGORDON



Summary of Issues Raised in Comments (4 comments)

- NatureScot comments: Cromarty Firth including the SPA, Ramsar and SSSI should be safeguarded through placemaking priorities; multi-use green networks should be included as a placemaking priority between the settlement and the coast; if sites IG04, IG05, IG06 and IG07 are taken forward into the proposed plan, effects on the SPA should be considered within the HRA.
- Landowner of IG10 objects to removal of allocation: the housing projections in the MIR are too low; capable of delivering 30-60 units; highly sustainable location in terms of access to employment opportunities and facilities; potential to deliver variety of housing types, e.g. self-build; sufficient infrastructure capacity; previous developer interest and extensive assessments undertaken; compares favorably in comparison to other preferred sites in terms of deliverability; lack of allocations will undermine aims of supporting the town to grow; no visual impact and attractive setting. Finally, the name should be changed to Castle Grounds, Rosskeen.
- One respondent states that IG04 is only suitable for housing, business and community, not industrial: close to the town centre; potential new school site. Also states that industrial uses (rig repairs and fabrication) at IG05 are not compatible with tourism and residential, including damaging image of the town for visitors and residents.

Recommendations & Reasons

- Placemaking Priority added to ensure development does not adversely impact on relevant environmental designations. It will be further refined through the HRA process.
- Another Placemaking priority will be added to promote the creation of multi-use green networks between the settlement and the coast
- Don't support the reallocation of the castle grounds of Rosskeen (IG10) because there are better alternative sites which meet and exceed the housing needs. There are also woodland and access challenges. The willingness of the landowner and previous developer interest is noted and there may be scope for inclusion in future development plans but that is likely to depend on the extent of build out rates of allocations.
- It is considered that due to the scale of fuel tank site IG04 that opportunities exist to allocate a wide range of uses to ensure flexibility and encourage redevelopment.

<u>Placemaking Priorities</u>

- Consolidate the town with growth focused on brownfield development and rounding off sites.
- Improve the public realm along the B817 and connections between the harbour area and the High Street to enhance the visitor experience and links with the local community.
- Redevelop and regenerate under utilised brownfield sites within the central area of the town.
- Support further business and industrial expansion at allocated and established employment sites.
- Continue to enhance the vibrancy and vitality of the town centre to better attract visitors such as those from cruise ships and travelling on the NC500.
- Support Transport Scotland in identifying suitable improvements to Tomich Junction and seek developer contribution towards its delivery.
- Proposals must demonstrate no adverse impact on the Cromarty Firth SPA as well as avoiding disturbance to features of the Cromarty Firth SSSI.
- Create and enhance multi-use green networks between the settlement and the coast where possible.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|------------------------------------|--|-------------------------------------|
| Cromlet | Housing | 93 |
| Invergordon Mains | Housing | 100 |
| Land south west of Railway Station | Housing, Retail, Business, Community | 32 |
| Disused fuel tank farm | Housing, Business, Community, Industry | 45 |
| Invergordon Harbour | Industry | n/a |
| Inverbreakie Industrial Estate | Industry | n/a |
| Cromarty Firth Industrial Estate | Industry | n/a |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



SEABOARD VILLAGES



Summary of Issues Raised in Comments (46 comments)

- NatureScot would like all proposals to be asked to demonstrate how
 they will avoid sedimentation and pollution reaching the Cromarty Firth
 SPA as well as avoiding disturbance to features of the Cromarty Firth
 SSSI. Developer requirements should include issues such as coastal
 erosion, flood risk, and active travel.
- NatureScot and RSPB must take account of potential impacts on Moray Firth SPA/SAC and the Rosemarkie to Shandwick Coast SSSI, plus significant effects are likely through increased footfall and disturbance to breeding cormorant; these effects on European sites should be considered with relevant HRAs.
- Nigg & Shandwick Community Council does not support allocation of SB04 prior to SB03 being developed due to unsuitable access road for additional heavy vehicles in terms of road condition and safety or nearby residents.
- Nigg & Shandwick Community Council objects to SB06 and SB08 not being allocated for housing. SB06 has planning permission for 13 houses and SB08 has easy access to Primary School, shop, post office, pub & community hall.
- Nigg & Shandwick Community Council and others object to SB05 being allocated for development for following reasons: poor road access, water supply/foul drainage at capacity, change character of village, flood risk, coastal erosion, threat to dunes, impact on natural habitat, loss of public sea views. NatureScot would support site not being allocated. Landowner supports site as an effective housing site which could be, asserts that other land (in their ownership) could be made available for community and recreational use, flood risks can be mitigated.
- Nigg & Shandwick Community Council and others object to SB02 and SB07 for the following reasons: poor road access, loss of public sea views, coastal erosion, flood risk, drainage issues, threat to dunes, visual impact on Shandwick Stone, impact on natural habitat, change character of village. NatureScot would support site not being allocated. Some support for sites to provide opportunity for small-scale holiday park which could provide economic and employment opportunities. Landowner seeks allocation for housing, caravan site and holiday pods, but seeks the site SB07 to be reduced in size.
- New site for housing suggested below Hilton of Cadboll Farm, behind Back Street and Lady Street.

Recommendations & Reasons

• The proposed allocations are supported because SB01 is in a central location and close to Primary School and benefits from a planning permission. It is considered that the focus of business and industrial development should be at SB03 Balintore Industrial Estate prior to considering other sites. SB02 and SB07 will provide opportunities for tourism uses (caravan/holiday pod site) on site and a limited amount of housing. It is recommended that SB02 and SB07 are amalgamated into one site, with the section currently shown as SB07 reduced in size as indicated by the landowner (map below shows red line boundary of amalgamated site).



- Other sites are not supported because they have a combination of road capacity constraints, valued green space, potential impact on character of the village, no indication of active interest on site, planning permission has expired and/or are not required to meet forecast need/demand.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.
- No additional sites consultation is being undertaken for new sites proposed.

- Focus limited housing growth close to existing facilities.
- Key infrastructure improvements.
- Protect the setting of the 'Shandwick Stone' scheduled monument and areas of prime agricultural land.
- Improve and enhance the shore paths.
- Proposals must demonstrate how they will avoid sedimentation and pollution reaching the Cromarty Firth SPA as well as avoiding disturbance to features of the Cromarty Firth SSSI.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|--|---------------------|-------------------------------------|
| SB01 Land East of Primary School | Housing | 32 |
| SB03 Balintore Industrial Estate | Business/Industrial | n/a |
| SB02 and SB07 Land South of Shore Street | Tourism, Housing | 5 |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.





Summary of Issues Raised in Comments (12 comments)

- NatureScot would like placemaking priorities included which recognise the importance of blue and green networks and the role of woodland for active travel opportunities
- Dornoch Firth and Loch Fleet SPA, Dornoch Firth and Morrich More SAC,
 Morrich More SSSI must be taken account of in placemaking priorities.
- New site requested on land adjacent to the former Morangie Farm Steading (west of A9) for a potential Eco-Energy Plant linked to the distillery.
- SportScotland would like the mix of sports pitch types and sports in relation to the new campus to be considered.
- Owners/agent of Glenmorangie support the continued location of TN05 as distillery is a significant part of the local economy. Request boundary to be redrawn to reflect the full extent of the distillery site boundary. Also support the continuation of as Business allocation at TN04 as it safeguards land for business use between the Glenmorangie Warehouses and Tain Industrial Estate, has excellent strategic road connections and is accessible for local employment. They also would like TN06 to be allocated for housing because: it focusses housing development closer to town centre; active travel distance to major employers; previously granted consent; access to services. Considered a more deliverable site than others in the town.
- The owner/agent of TN08 seek to have it retained as allocation because: it is currently allocated; plays a part in planned expansion of Tain and 20 minute neighbourhoods; provides effective housing land supply; developer interest continues; Masterplan been prepared for site; will potentially provide self-build plots. Objections to TN08 because it is considered unlikely that this large mixeduse site will be deliverable during the lifetime of the plan.
- NatureScot highlights that TN10 is adjacent to Morangie Forest SPA which is
 designated for its capercaillie interest and recreational disturbance from
 housing on site would have a likely significant effect on capercaillie. Also advise
 that there is potential for cumulative effects if TN11, TN12 and TN13 were also
 taken forward. Mitigation will be required.
- Objections to TN10, TN11, TN12, TN13 because sites are removed from town centre and conflicts with sustainability principles.
- No comments received on TN03, TN07, TN09, TN14 OR TN15.

Recommendations & Reasons

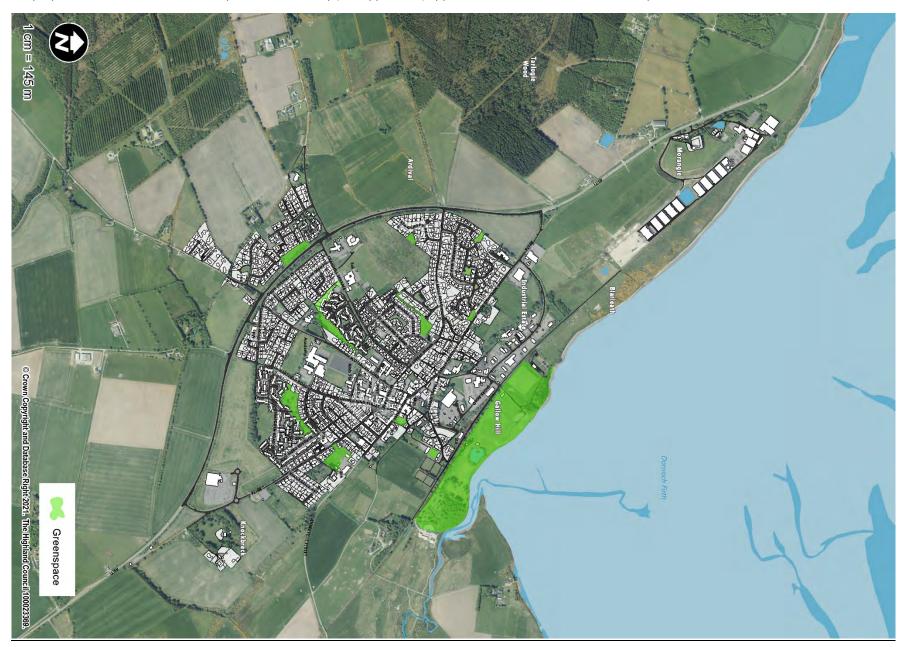
- The proposed allocations are supported because: Delivery of a new 3-18 campus is a long held aspiration for Tain. The development of the campus and the subsequent re-use of the existing Academy site at TN02 will influence the scale and direction of growth for the town. It will provide an opportunity to focus on development closer to the town centre. Land at TN03 is a viable site which can provide housing in a central location. TN07 could provide for a small amount of lower density housing, potentially self-build housing within a central site. TN04 and TN05 continue to be important Business and Industry sites. Boundary of TN05 will be redrawn to reflect the full extent of the distillery site boundary. TN11 is in Council ownership, is considered deliverable and it could provide a good location for self-build housing plots. TN10, TN12 and TN13 are recommended for allocation for housing at the request of Local Members. In particular it is considered that land at TN13 is deliverable. TN12 and TN13 could potentially provide for several hundred houses over the longer-term. For the 10 year period of the Plan it is considered that the sites would not be built out fully and this is reflected in the indicative housing capacity figures. A masterplan would be beneficial for the wider Viewfield and Croft Arthur area. TN14 The Grove is a smaller site than would normally be allocated, however it is considered that the redevelopment of this site is of such importance to the town that it would benefit from being allocated.
- Other sites are not supported because: At TN06 there is no indication of
 active interest for housing development on the site and there are road access
 issues to overcome. It is however recommended that the land stays within the
 SDA. There are other more centrally located and viable sites than the large
 mixed-use site at TN08 and the proposed expansion to it at TN15. Once these
 other more central sites are developed, this could be a potential future longterm direction of growth for Tain.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed. The Cemetery will no longer be shown as an allocation as the expansion is complete; it will however remain within SDA. Include SDA extension to include land between railway line and coast, from where it currently ends along to TN05.
- No additional sites consultation is being undertaken for new sites proposed.

- Delivery of a new 3-18 campus.
- Ensure the historic core of the town in protected.
- Improve town centre environment, diversify activity and improve accessibility.
- Active travel link between the town and Glenmorangie Distillery.
- Develop new uses for redundant space and buildings, including The Grove and Tain Picture House.
- Preserve blue and green networks and enhance their role as active travel routes.
- Enhance the role of woodland for active travel opportunities.
- Avoid any adverse effect on adjacent European nature conservation sites.

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|---|--|-------------------------------------|
| TN01 Land to Rear of Craighill Primary School | Mixed Use (Community/Housing) | 10 |
| TN02 Tain Royal Academy | Mixed Use (Housing/Community/Business) | 50 |
| TN03 East of Burgage Drive | Mixed Use (Housing/Community Greenspace) | 40 |
| TN04 Blarliath | Business | n/a |
| TN05 Glenmorangie | Industry | n/a |
| TN07 Kirksheaf Road | Housing | 10 |
| TN10 Ardlarach Farm | Housing | 10 |
| TN11 Croft Arthur | Housing | 10 |
| TN12 West of Viewfield Road | Housing 3.45ha | 5 |
| TN13 Viewfield | Housing 21.9ha | 50 |
| TN14 The Grove | Housing | 8 |

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



GROWING SETTLEMENTS

BARBARAVILLE

Summary of Comments and Recommendations

RSPB: Barbaraville is adjacent to Nigg Bay RSPB reserve and internationally important designated sites and there may be disturbance issues <u>Recommendation</u>: Check the designations and if appropriate include words in PP.

NatureScot - Adjacent to Cromarty Firth SSSI, SPA and Ramsar and there are watercourses including the Pollo Burn which flow into these protected areas. Effects on the SPA need to be considered in HRA. A placemaking priority should be included that development must avoid sedimentation and pollution reaching the SPA, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI and Ramsar. Text should also highlight that there are strips of Scottish Semi-Natural Woodland in places and that development should not impact on woodland and tree roots. Highlight opportunities to retain and establish green networks.

Recommendation: Include placemaking priority as suggested by NatureScot. No sites to be considered by HRA.

Active travel routes west towards Invergordon and east towards the village hall and church at Polnicol should be improved, whether by providing footpaths or widening existing ones.

Recommendation: Include text on active travel provision.

Placemaking Priorities

- Preserve public views across the Cromarty Firth.
- Development must avoid sedimentation and pollution reaching the SPA, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI and Ramsar.
- Enhance green and blue networks.

HILL OF FEARN

Summary of Comments and Recommendations

NatureScot supports the placemaking priority to safeguard areas of Scottish Semi-Natural Woodland Inventory and Ancient Woodland Inventory. Watercourses including The Canal flows through the settlement and into the Tallich SSSI; Placemaking Priority should be included for development proposals to demonstrate how they will protect the interests of the SSSI. Opportunities to create green and blue networks, linked into the wider woodlands as well as active travel routes.

Recommendation: Include text as per suggested by NatureScot.

Placemaking Priorities

- Safeguard areas of Scottish Semi-Natural Woodland Inventory and Ancient Woodland Inventory to the north of the village from development.
- May be opportunity for limited amounts of housing development infill. Older parts of village have some sections of vennels or alleys, these should be preserved.
- Discourage development encroaching in a linear pattern along B9165 Station Road towards Fearn. Equally discourage development to the south of the B9165 Station Road.
- Village green area should be protected from development.
- Enhance blue and green networks.
- Development proposals should have regard to Tallich SSSI.

INVER

Summary of Comments and Recommendations

NatureScot supports the placemaking priority to preserve open views to the north over the Morrich More and Dornoch Firth. Effects on the SPA and SAC should be considered in the HRA. Text should be added stating that proposals must demonstrate how they will avoid sedimentation and pollution reaching the SPA and SAC, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI and Ramsar. Green buffer strips along the waterfront may help protect the water environment.

Recommendation: Include text as per suggested by NatureScot. No sites to be considered by HRA.

Placemaking Priorities

- May be development potential to immediate south east of settlement.
- Potential for development along Shore Street heading towards the Primary School.
- Preserve open views to the north over the Morrich More and Dornoch Firth by ensuring adequate distances between houses and preventing infill development on the road between Tain and Portmahomack.
- Development must avoid sedimentation and pollution reaching the SPA and SAC, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI and Ramsar.
- Enhance green network along the coast.

MILTON OF KILDARY

Summary of Comments and Recommendations

NatureScot supports the plan to protect Ancient Woodland Inventory which is also Scottish Semi-Natural Woodland Inventory. Opportunities to enhance access to core path through enhancement of multi-use green networks. There are a number of watercourses through the settlement which flow into the Balnagown River, which in turn, flows into the Sands of Nigg. The Sands of Nigg are situated within the Cromarty Firth Ramsar, SPA and SSSI. Development proposals should demonstrate how they will avoid sedimentation and pollution reaching the Cromarty Firth SPA, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI. Effects on the SPA should be considered within the HRA.

Recommendation: Include text as per suggested by NatureScot. No sites to be considered by HRA.

Landowners do not agree with Milton of Kildary not having any allocations and would like it moved up the settlement hierarchy to either tier 3 or 4 main settlement. Allocated sites would provide certainty to landowners and local residents. Two site allocations suggested to be included in plan: Land at Wester Tarbat (site sits to the south of Milton of Kildary) and Land to the South West of Milton of Kildary.

Recommendation: Retain as a Growing Settlement. Do not include land at Wester Tarbet or Land to the South West of Milton of Kildary.

Placemaking Priorities

- Safeguard areas of native and ancient woodland, Scottish Semi-Natural Woodland Inventory and the Tree Preservation Order at Balnagown Bridge and East Lodge.
- Protect and where possible enhance access to Core Paths through enhancement of multi-use green networks.
- Protect and enhance the village's heritage assets notably the Conservation Area and several listed buildings.
- Development proposals should demonstrate how they will avoid sedimentation and pollution reaching the Cromarty Firth SPA, so as to avoid any adverse effect on integrity, plus protect the interests of the SSSI.

PORTMAHOMACK

Summary of Comments and Recommendations

NatureScot – opportunities to include mulit-use green networks to help enhance core paths. Adjacent to the Moray Firth SPA and SAC and effects on these European sites should be considered within the HRA. Development proposals should demonstrate how they will avoid sedimentation and pollution reaching the SAC and SPA, so as to avoid any adverse effect on integrity.

Recommendation: Include text as per suggested by NatureScot. No sites to be considered by HRA.

Landowner does not agree with Portmahomack not having any allocations and would like it moved up the settlement hierarchy to either tier 3 or 4 main settlement. Would like land at Bindall Farm allocated (south east of Portmahomack).

Recommendation: Retain as a Growing Settlement. Do not include land at Bindall Farm as an allocation.

Placemaking Priorities

- Protect and where possible enhance access to Portmahomack to Tarbatness and Portmahomack to Inver Core Paths.
- Support local community with efforts to enhance the harbour and its facilities.
- Seaward land on the western approach into the village should not be built on to safeguard public views over water.
- Potential for infill development.
- Development proposals should demonstrate how they will avoid sedimentation and pollution reaching the SAC and SPA, so as to avoid any adverse effect on integrity.

RHICULLEN/NEWMORE

Summary of Comments and Recommendations

NatureScot supports the Placemaking Priority to protect the Ancient Woodland Inventory which is also Scottish Semi-Natural Woodland Inventory. Opportunities to link multi-use green networks into the wider woodlands.

Recommendation: Include text as per suggested by NatureScot

Landowner does not agree with Rhicullen/Newmore not having any allocations and would like it moved up the settlement hierarchy to be a main settlement. Site allocation suggested to be included in plan (to the east of Rhicullen/Newmore).

Recommendation: Retain as a Growing Settlement. Do not include suggested land as an allocation.

Placemaking Priorities

- Any new housing should be clustered around the existing housing group.
- Limit development to consolidation on east-west axis.
- Safeguard areas of native and ancient woodland and Scottish Semi-Natural Woodland Inventory to the north and south of the village from development.
- Playing field should be protected from development.
- Rhicullen Training Trenches Scheduled Monument to be safeguarded from development.

ARDROSS

Landowner objection to non-identification of Ardross as a Growing Settlement because: it has similar level of facilities to other Growing Settlements; clusters of housing east and west of B9176 Struie road; without it, future house building potential will be inhibited, and school roll may fall. Would like Ardross to be included as a Growing Settlement and a site allocated for housing adjacent to Dublin Cottages. The proposed site would: address local housing need including affordable housing; consolidate Ardross as a Growing Settlement. Ardross has a Primary School, Community Centre, local business/facility, local employment at the new distillery, good access to road network.

Recommendation: Do not include as a Growing Settlement or allocate the suggested land for housing. All planning applications to be determined by general policies of the Development Plan. Ardross is not a single cluster development community and the potential merger of groups is not appropriate. Applying Policy 35 of the Highland wide Local Development Plan will allow limited rounding off of the several existing groups that comprise the community.

ECONOMIC DEVELOPMENT AREAS:

HIGHLAND DEEPHAVEN



Summary of Issues Raised in Comments (4 comments)

NatureScot request additional Placemaking Priorities/developer requirements: protection of Cromarty Firth SSSI; Allt Graad watercourse runs through the site and into firth, so protection of water environment needed; mitigation to be included for SPA and SAC resulting from HRA; woodland interests should be excluded from the developable area and developer requirement added to not impact on it; safeguard and enhance green and blue corridors to provide multi-use networks (similar comment from RSPB); assessment of potential future coastal change and its effects on future flood risk.

Network Rail whilst the rail halt is not promoted by them, recognise the possible future uses (including potential 'Greenport') and support the safeguarding of land. Suggest a single halt for Evanton and Highland Deephaven should be explored.

Recommendations & Reasons

Retain Highland Deephaven as an EDA for Industry. Include developer requirements relating to: the avoidance of impact on the European Sites based on the outcome of the HRA and other relevant designations; safeguard and enhancement where appropriate of woodland; safeguard and enhance green and blue corridors to provide multi-use networks; assessment of potential future coastal change and its effects on future flood risk.

| Site Name | Acceptable Use(s) |
|--------------------|-------------------|
| Highland Deephaven | Industry |

NIGG ENERGY PARK

Summary of Issues Raised in Comments (7 comments)

NatureScot:

- Support placemaking priority to protect environmental designations but request additional developer requirement relating to the SPAs and SACs, and the Ramsar and SSSI and other EPS (similar comments by RSPB).
- Recommend that the woodland interests should be excluded from the developable area and developer requirements added to avoid impacts on them.
- Highlight opportunity to add additional placemaking priority for delivery of multi-use networks based on the
 woodland within and around the EDA to create improved access routes and wildlife corridors which could
 help to address biodiversity loss and the climate emergency.

Landowner of land east of B9175:

- supports the revised position as shown in the MIR because: the proposed allocation better protects the surrounding environment and landscape character; limits the visual impact on the historic town of Cromarty; protects and enhances the amenity value to locals and visitors.
- Objects to the existing boundary because: it is excessive (200ha/500acres), ill-considered (e.g. land most recently developed at Nigg was not on allocated land) and largely unsuitable for industrial development; the land is within his ownership; it is not viable for industrial uses, which is highlighted by the site lying undeveloped for 50 years and previous owner failing to find a commercial buyer. Supports the proposal to not carry forward the Development Masterplan, adopted as Supplementary Guidance in 2013.

 Whilst the comments made by Global Energy Group about the future growth prospects are noted, we recommend that the allocation boundary encompasses the existing footprint of the facility (to support intensification/redevelopment) are
- Objects to the Placemaking Priority statement to "safeguard suitable land to the east of the B9175".
- With recent investment and plans for the area, including his own proposed world class golf course, the IMFLDP recognises the importance of sustaining industry and tourism alongside each other at Nigg and around the Cromarty Firth, and these can co-exist. Support existing references in this regard.

Tain and District Development Trust support the proposed changes to the industrial allocation as shown in the MIR.

Landowner of land adjoining Nigg Yard (Wakelyn Trust and Dunskaith Property Company):

- The respondent's organisation has helped support the development of both the yard and an industrial centre an area which extends around the eastern side of the Nigg and the ferry which promotes the tourism in the area.
- Supports the revised position as shown in the MIR and believes it is vital that the Plan recognises the importance of sustaining industry and tourism alongside each other. No-one has approached them to develop the land east of the B9175 since the 1970s.
- Supports the proposed golf course as it offers huge opportunities and can co-exist with industrial development, i.e. the hallmark of the Cromarty Firth.
- Support the Placemaking Priority to minimise levels of noise and light pollution during construction and operation stages.
- Further placemaking priority that any further industrial expansion should be designed in a way to minimise adverse visual impacts on the historic town of Cromarty and those visiting the Firth on cruise liners.

Recommendations & Reasons

The Plan continue to highlight the strategic importance of Port of Nigg within the energy industry and its continued expansion. Highlight the regions of the Plan which are best placed to support the growth of the renewable energy industry, the Spatial Strategy identifies 'Strategic Renewable Energy Zones', which includes Port of Nigg.

Developer requirements will be added to: protect the European Sites based on the outcome of the HRA; protect woodland and highlight multi-use networks within and around the EDA for recreational and wildlife benefits where appropriate.

Whilst the comments made by Global Energy Group about the future growth prospects are noted, we recommend that the allocation boundary encompasses the existing footprint of the facility (to support intensification/redevelopment) and on land to the east of the B9175 as was shown in the Main Issues Report. At present, it is considered that this boundary represents the most effective potential expansion east of the B9175 for Global Energy Group.

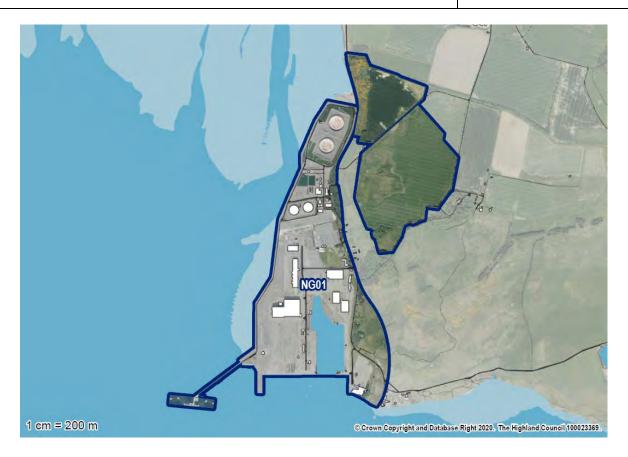
This position takes account of the differing views of the landowners and potential significant economic benefits from the proposed tourism and leisure facilities to the east of Nigg Energy Park. To highlight the tourism/leisure opportunities, an area which extends around the eastern side of the Nigg Peninsula and around Cromarty has been identified in the Plan's Spatial Strategy as a 'Sustainable Tourism Potential Growth Area'. These features reflect areas which have been identified as having current proposals and the capacity to develop a range of tourism and leisure facilities.

Whilst the Plan will make reference to the Council's support for the co-existence of the industrial development and the tourism/leisure proposals, this position will not rule out other commercial uses, such as further industrial development, indefinitely on the land east of Nigg Energy Park. The Council's general planning policies, including HwLDP Policy 41 'Business and Industrial Land' and the new Industrial Land

Individual supports the golf course proposal at Nigg because it will help sustain the local community, bring a neglected site back into use and create jobs.

Global Energy Group (owner/operator of Nigg Energy Park) objects to the revised position as set out in the MIR and seeks the continuation and expansion of the existing allocations because: Nigg Energy Park is of national significance; significant interest in establishing the Port of Nigg into a renewables hub, which will result in new manufacturing and logistics jobs for the whole Region; the land is included in the Opportunity Cromarty Firth application for Greenport status, which will further enhance the opportunities for inward investment; the sites removed are the most cost effective and operationally effective solutions to the expansion of Nigg Energy Park, highlighted by a study in 2014

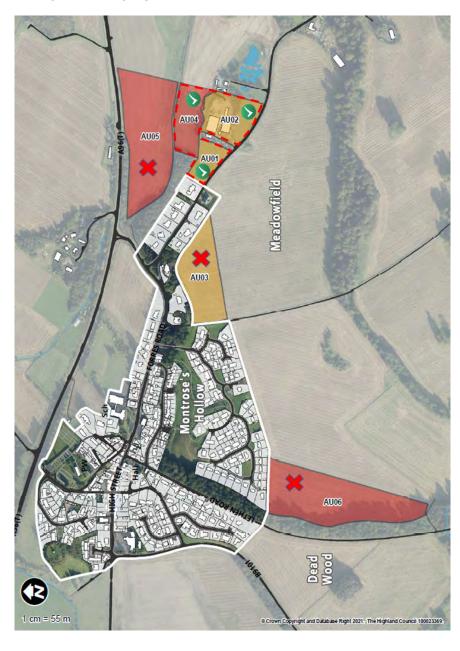
Policy being introduced through this Plan, will provide support for appropriate industrial developments on non-allocated land.



| Site Name | Acceptable Use(s) |
|------------------|-------------------|
| Nigg Energy Park | Industry |

APPENDIX 2: NAIRNSHIRE COMMITTEE: SETTLEMENTS

MAIN SETTLEMENTS: AULDEARN



Summary of Issues Raised in Comments (7 comments)

- Historic Environment Scotland note that should AU05 be allocated then the boundary needs to be redrawn to exclude the scheduled monument or developer requirement added. Agree that AU06 should not be supported due to impact on Inventory Battlefield of Auldearn.
- NatureScot recommend multi-use green networks for active travel and open space requirements.
- Landowner seeks allocation of AU03 based on: natural infill, low density housing proposed, reflective of adjacent settlement pattern, suitable access achievable onto Moyness Road; site is effective.
- Housebuilder argues for reallocation of AU01 and AU02 and allocation of AU04 and AU05 based on: effectiveness of the sites, allocations will support the village and services, no significant environmental constraints, detailed design / masterplanning work can address other concerns.

Recommendations & Reasons

- Add Placemaking Priority to preserve and enhance multi-use green networks.
- AU01, AU02 and AU04 allocate for housing development but flood risk, enhancement of green network, siting and design, active travel connections, and transport/access upgrades will be important development factors.
- AU03 don't retain the site as suitable access arrangements have not been shown to be achievable.
- AU05 don't retain site as the additional land is not required in quantitative terms. Also, without any connection onto the A96, it results in all traffic using Moyness Road. Post delivery of the A96 bypass, the site may merit inclusion in future Plan reviews.
- AU06 is not supported because of impacts on Battle of Auldearn designated site and settlement character and poor access/transport connections.

- Consolidate Auldearn with any new development helping to round off and infill the settlement.
- 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.
- Preserve and enhance the green network within and around Auldearn, particularly areas of woodland and watercourses, for active travel use and biodiversity.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|---------------------|-------------------|-------------------------------------|
| Land at Meadowfield | Housing | 30 |

Summary of Issues Raised in Comments

(24 comments)

Nairn West and Suburban Community Council (CC) and Nairn River CC make similar comments:

- Support Placemaking Priorities but highlight challenges delivering them. Lack of investment in infrastructure (roads, flood and drainage, schools and care provision) have not been recognised.
- Local Place Plan is required prior to LDP and it must focus on Nairn's specific needs: self-reliant community; business/job growth; build on Nairn's reputation as a tourism and leisure destination; infrastructure first/delivery; strengthening the town centre; digital connectivity; community action. It must utilise local and up-to-date evidence as the MIR is based on incorrect and old data.

Nairn West and Suburban CC only

- A96 By-Pass for Nairn is imminent and the route should be safeguarded on settlement map.
- Include a series of multi-use 'Linear Parklands' combining active travel, biodiversity and flood plains and bringing in areas of woodland and wetland.
- NA03 (Sandown) is common good land and CC have objected to its release for development. The Common Good should not be liable for developer contributions. The housing market is currently depressed and the land should not be considered for sale at this time.
- NA05 (Delnies) Support its retention as the site has permission and to avoid it becoming isolated from Nairn.
- N06/07 (Nairn South) Acknowledges its central location but highlights the transport network as potential unsurmountable constraint. Consideration should be given to new road bridge given the school is be re-sited.
- NA09 (Granny Barbour Road) The CC favours the allocation over others because it can help deliver aims listed above and will benefit from the A96 bypass.
- NatureScot recommend additional Placemaking Priority highlighting the opportunity to create multi-use green networks.
- RSPB state that Moray Firth SPA, Moray and Nairn Coast SPA, Inner Moray Firth SPA, Moray Firth SAC and Culbin Bar SAC need to be identified within Placemaking Priorities.
- One respondent supports the plans for the town centre but stresses it is dependent on A96 bypass.
- Nairn should be considered the topmost tourism destination due to its existing assets rather than Loch Ness which has infrastructure constraints and is overloaded with visitors.
- One respondent objects to the content of the MIR because: it is focused on housing; lacks vision; fails to recognise Nairn's strengths, particularly tourist appeal and potential; infrastructure inadequacies have not been addressed. Supports the Placemaking Priorities but highlights the lack of detail to deliver them. Investment in water quality is required to accommodate development.
- Housebuilder supports Nairn being in the top tier of the settlement hierarchy but questions the far lower levels of
 development proposed in the MIR compared to other Tier 1 settlements. Argues that NA09 (Granny Barbour
 Road) site is more suitable than 'preferred' NA03 (Sandown) as: there remains uncertainty over its availability due
 to being within Common Good ownership; is equally distant from the town centre. Also, DA05 (Delnies) is well
 established with extant permission for 300 houses and there is developer interest. Whilst NA06 (Nairn South) is
 allocated in HwLDP and IMFLDP, the transport issues appear insurmountable and compatibility concerns with the

Recommendations & Reasons

- General support for the Placemaking Priorities identified in the MIR is acknowledged but we agree that many of the other aims highlighted by the CCs are best explored further and planned for through a Local Place Plan (LPP) which the community have been actively encouraged to prepare. The Scottish Government have made provisions for communities to undertake LPPs and the Plan emphasises the desire to do so within the Nairn community.
- The Plan will emphasise the importance of A96 bypass for Nairn and the need to continue to prioritise development and investment in the town centre through a reinforcement of the Town Centre First principle and the shared delivery of the Nairn Community Town Centre Plan.
- Additional Placemaking Priorities to cover: promoting opportunities for multi-use green networks within and surrounding the town; highlighting the importance of the new replacement secondary school.

Sites recommended to be allocated and their justification:

- NA01 Town Centre to reflect wider regeneration priority and reuse opportunities.
- NA03 Sandown Unresolved Common Good issues are recognised (indicative housing capacity identified for the Plan period is reflective of this) but the site is well established in planning terms and relatively well integrated with existing built development.
- NA04 Former Showfield –Approximately ¼ of greenspace proposed to be allocated for 20 homes, with site area reduced from the adopted Plan position to address any significant adverse impact on overall amenity value, and noting that the site benefits from being centrally located.

- neighbouring sawmill. NA09 (Granny Barbour Road) benefits from: fitting well within landscape; no insurmountable physical, infrastructure or environmental constraints; the site is effective and viable; can be accommodated and well integrated within the transport network, including active travel and public transport provision; the housebuilder has a proven track record in Nairn, compared to other allocations/developers.
- Owner of John Gordon & Son Limited sawmill objects to allocation of NA06 (Nairn South) because: policy support
 is subject to consideration of transport and infrastructure, which have yet to be resolved; development will limit
 growth of the sawmill; restrictions on the operating requirements of the sawmill would impact the company,
 economy, public interest and housing market. Suggested developer requirement for NA06 if allocated relating to
 mitigation and highlight the need for sufficient buffer which takes account of expansion of the sawmill. The
 sawmill owner supports allocation of NA07 (Sawmill Expansion) because: it is well established in policy terms; has
 extant permission for sawmill expansion; is the town's largest employer and contributes significantly to the local
 economy; it's potential to grow and remain competitive is essential for Nairn's prospects
- Landowner/developer consortium support the reallocation of NA06 (Nairn South) for 520 homes, employment and
 community uses for the following reasons: logical and sustainable southern expansion of Nairn; strengthen Nairn's
 role as a social and economic hub; deliver high quality placemaking; maximise benefits of the A96; close proximity
 to transport options; can deliver 20 minute neighbourhoods. Supporting information was submitted as part of
 their representation.
- Sportscotland state that for NA04 (Former Showfields) consideration is needed in relation to the effect on adjacent
 pitch. Another respondent objects to any development at NA04/NA12 as: it's a valued and safe greenspace which
 is central and well used, particularly since the pandemic; identified in the Council's greenspace audit; removal of
 greenspace goes against national policy. One respondent requests it be shown as greenspace.
- Landowner of NA05 (Delnies) supports the reallocation of the land for the following reasons: it is justifiably a tier 1 settlement but not enough housing land supported in the MIR; A96 Nairn bypass will reduce congestion in the town; current housing need figures are not confirmed yet; principle of housing development is firmly established; extant permission for 300 homes including a new school up to Jan 2024; associated with the delivery of development of Sandown as per the Development Brief; de-allocating it would lose a school site and much needed affordable housing; viability is being used as a strong steer for supporting allocations, this site has developer interest and extant permission.
- Landowner of NA08 (Achareidh) supports the reallocation of the site for 30 homes for the following reasons: very sustainable location with good active travel connections to key facilities (also better than alternative sites); helps consolidate the town; greatly benefits from A96 bypass; free of major constraints; smaller scale than alternatives; capable of providing self build opportunities; extensive work already gone into assessing access, woodland etc.

Several individuals raised similar comments:

- Community wishes to prepare its own Local Place Plan (LPP). The data used in preparing the MIR is out of date.
- Support NA01 (Town Centre) but disagree with recent Council-led development within it and flag there was no reference an empty property report which highlights opportunities for reusing existing buildings/land.
- NA02 (Kingsteps) should be removed as now built out.
- NA03 (Sandown) highlights that: it is 'inalienable' common good land; reference to current developer interest
 conflicts with previous statements made by the Council; pre-empts the outcome of the common good
 consultation; significant infrastructure required.
- NA05 (Delnies) highlights the extant permission but questions whether it is being land banked. One person expressed support for the site as is offers 90 affordable units as part of the permission.

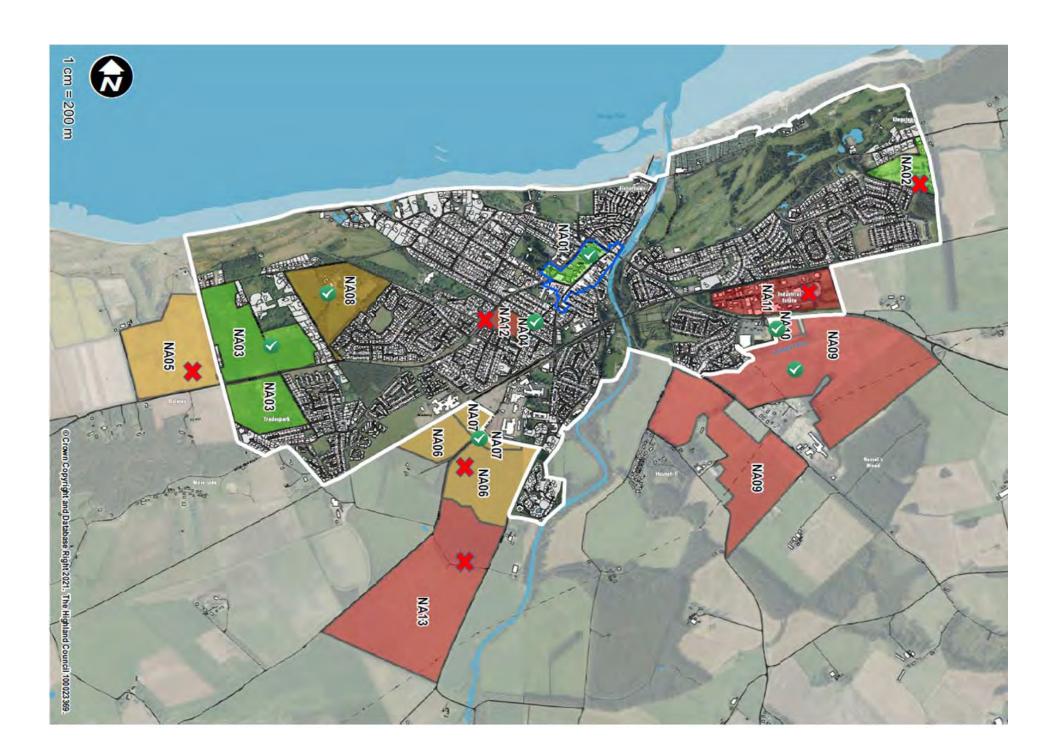
- Enhancement of the remaining greenspace (including access) will be a requirement.
- NA07 Sawmill Expansion Well established business and major employer which is within walking distance of much of Nairn.
- NA08 Achareidh Relatively central site which has scope for development. Indicative capacity limited to 30 units but this will be dependent on demonstration that appropriate transport/access can achieved.
- NA09 Granny Barbour Road –Recommended that the site at Nairn East is allocated and forms a key part of the long term growth strategy for Nairn because: with proper masterplanning and phasing strategy, it can be well integrated into the built fabric of the town and has ability to connect well to the transport network for all modes of the transport hierarchy; it does not suffer from physical constraints which cannot be overcome by appropriate mitigation; its scale allows for long term appropriate infrastructure delivery. Addressing flood risk, connectivity to the town centre and Balmakeith, education provision and impacts on the transport network will be key requirements.
- NA10 East of the Retail Park Supported for Housing, Business and Community uses as it will form part of the wider strategy for Nairn East.
 Further expansion of the retail park will not be supported as part of the allocation and similar requirements to NA09 will be included to ensure appropriate delivery of the site.

Sites not recommended for inclusion in the Plan and the justification:

- NA02 Kingsteps Now fully built out.
- NA05 Delnies Extant PIP consent not progressed to detailed application. Detached from the settlement and viability concerns.
- NA06 Nairn South Whilst the site is in close proximity to certain key facilities, significant concerns remain about the capacity of the

- NA06/NA13 (Nairn South) objects to the site insofar that it remains problematical and not viable.
- NA09 (Granny Barbour Road) and NA10 (East of retail park) objects due to transport constraints and reliance on the bypass solve these.
- NA13 (Nairn South Ext) objects to the site's inclusion in the Plan.
- Two respondents favour NA09 (Granny Barbour Road) over others because: it provides opportunity to develop Nairn's economy, making it less reliant on Inverness; residents of Sandown would be more likely to travel to Inverness than those at NA09; opportunity to create path networks into countryside; sufficient level of growth to provide proper infrastructure; closer to facilities and green network.
- A new housing site located south of Firhill/Nairn South was submitted by the landowner during the MIR consultation. Justification for inclusion: Nairn identified within top tier of settlement hierarchy but few sites preferred; it can be delivered in the short term, unlike other sites; free from major constraints; sustainable location.

- transport network to accommodate the development and the ability to deliver sufficient mitigation measures.
- The justification for not taking forward the other sites remain the same as shown in the MIR.
- The new site suggested at Firhill/Nairn South is not supported as it is not needed in quantitative terms, suffers from similar constraints as NA06 and there are better alternatives.



- 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.
- Replace the existing secondary school with a modern, sustainable and dynamic learning environment for students.
- Implement the Nairn Community Town Centre Plan to make the town centre 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.
- Preserve and enhance green networks within and surrounding Nairn, particularly those along the coast and inland to neighbouring settlements, for both active travel use and biodiversity. This should include the delivery of the A96 Coastal and Landward Trails.
- Concerted effort to maintain, and improve wherever possible, the water quality of the beaches in Nairn.
- Support the delivery of a community led Local Place Plan for Nairn and its role in helping to shape development and investment decision making.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-------------------------|--|-------------------------------------|
| Achareidh | Housing | 30 |
| Former Showfield East | Housing | 20 |
| Nairn Town Centre | Housing, Business, Retail, Community | 20 |
| Sandown | Housing, Business, Community | 150 |
| Nairn East | Housing, Business, Community, Industry | 250 |
| East of the Retail Park | Housing, Business, Community | 40 |
| Sawmill expansion | Industry | n/a |

GROWING SETTLEMENTS

In Cawdor, we continue to propose its re-categorisation to a Growing Settlement, which will promote more organic and smaller scale development, as the settlement lacks many key facilities and there is limited capacity within the existing infrastructure. Based on comments from Cawdor Castle Ltd, we propose to amend the first Placemaking Priority, which provides support for small scale and infill development, to also support the redevelopment of suitable brownfield sites.

CAWDOR

- Support small-scale infill and rounding off the village and redevelopment of brownfield sites which have no heritage value.
- 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.
- Preserve and enhance the woodland and watercourses within and around Cawdor for both active travel use and biodiversity.
- Deliver enhanced active travel connections including the A96 Landward Trail.

APPENDIX 2: WESTER ROSS, STRATHPEFFER & LOCHALSH COMMITTEE: SETTLEMENTS

MAIN SETTLEMENTS: STRATHPEFFER



Summary of Issues Raised in Comments (44 comments)

- Strathpeffer and District Community Council does not support any
 further large scale housing development in the village during the
 lifetime of this plan. The village has already had substantial recent
 housing development and any further growth needs to take account of
 this and be modest. Supportive of existing buildings being re-purposed
 and small infill brownfield sites being developed.
- Strathpeffer and District Community Council and others supportive of carrying forward greenspaces in adopted plan and identifying more at Loch Kinellan, Nether Kinellan Nature Reserve and part of SP02.
- NatureScot supports the placemaking priority to protect and enhance natural heritage features; seeks developer requirements for woodland protection and reference to better safeguarding of and enhancement of blue and green networks, including along the Peffery Way.
- Objections to SP02 from Strathpeffer and District Community Council
 and others because: excessive scale of housing development, impact on
 landscape, negative impact on tourism, impact on Nether Kinellan
 Nature Reserve, impact on historic environment, change character of
 village, impact on biodiversity. RSPB advise that Slavonian grebes and
 red kites breed in close proximity to the site. Strathpeffer and District
 Community Council would prefer it to be used for community
 greenspace.
- Objections to SP03 because: excessive scale of housing development, impact on landscape, visual prominence of particularly northern section of site, change character of village, impact on biodiversity, challenging topography, inappropriate scale of development. RSPB advise that Slavonian grebes and red kites breed in close proximity to the site.
 Strathpeffer and District Community Council, one Landowner and others would support small amount of development in southern section of site adjacent to SP01. Another landowner would like site allocated for 20-30 self build plots and asserts that steep topography and landscape impacts can be overcome.
- Objections to SP04 because of impact on historic environment, change character of village, visibility from A834, detrimental impact on village entrance.

Recommendations & Reasons

- The proposed allocation at the southern section of SP03 (outlined in red on the map below) is supported because it provides a modest amount of growth for the village after Strathpeffer having significant amounts of new housing in recent times. It will also have minimal impact on landscape. Mitigation/surveys will be required for potential flood risk and protected species. SP04 benefits from planning permission for 15 houses.
- Other sites, including the majority of SP03, are not supported due to a combination of issues including steep topography, impacts on natural environment, impact on village character and landscape.
- Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed. The settlement boundary has been drawn to allow for a small amount of infill development at the serviced plots at Ulladale Crescent.
- SP01 should be completed by the time of plan adoption, therefore it is not being shown as an allocation but will remain within the SDA.



- Support Peffery Way active travel link to Dingwall.
- Enhancement of tourist attractions and facilities.
- Protection and enhancement of outstanding built and natural heritage features.
- Main development focus should be on small infill brownfield sites and existing buildings being re-developed.
- Retain the greenspace and green networks in and around the village.

Greenspaces Map

We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



| Site Name | Acceptable Use(s) | Indicative 10 Year Housing Capacity |
|-----------------|-------------------|-------------------------------------|
| SP03 (Modified) | Housing | 7 |
| SP04 | Housing | 15 |

GROWING SETTLEMENTS

Very few comments were received in relation to these settlements. NatureScot suggested additional references to safeguarding and enhancing local natural heritage assets. Historic Environment Scotland commented that development should avoid any adverse impact on the scheduled monument at Contin. A landowner suggested a 50 house development on land east of the primary school at Marybank. The additional/amended references suggested by the national agencies are recommended for inclusion but not the specific site allocation requested at Marybank which is deemed too large relative to the community's constraints and infrastructure/facility capacities. However, a smaller infill proposal would be supported by the Plan's proposed text.

CONTIN

- Maintain Five Acre Wood as green space.
- Ensure development is set back from any mature trees.
- Any development close to Black Water River will need to ensure that it is not at flood risk.
- Any proposed tourist facilities near the filling station should ensure frontage onto the A835.
- Ensure no impact on Preas Mairi Chambered Cairn Scheduled Monument or its setting.
- Promote active travel links which connect to existing paths.
- Sits within the Hinterland so infill development opportunities should be pursued.
- Improve public transport connectivity.

GARVE

- New houses should be directed towards existing clusters.
- Discourage ribbon development along A832 or A835 especially north of village within Gorstan crofting area.
- Support re-development opportunities at the hotel and the land adjacent to it.
- Safeguard areas of native and ancient woodland, Scottish Semi-Natural Woodland Inventory and Red Squirrel Priority Woodland from development.
- Continue to develop community and recreational facilities.
- Improve public transport connectivity.
- Enhance green and blue networks to protect the water environment and for recreational purposes at the Black Water River.

MARYBANK

- To support the local community's desire to bring back a village shop facility possibly as an enhancement of facilities at the community hall.
- To protect the stands of mature trees, particularly on roadside verges, that are important to the amenity of Marybank and to extend and augment this 'policy' planting across the village and to connect with other green networks.
- To protect and improve local water quality by additional riparian planting especially in the watercourses that flow into the River Conon and may affect its associated European natural heritage designations.
- Subject to addressing these constraints to support clustered expansion of the village most acceptably east of Balloan Road and South of Ord Road.
- To support other development as infill opportunities rather than extending single plot depth "ribbon" development along the frontage of the settlement's roads as they pass into surrounding open countryside.
- To improve public transport connectivity.