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**Action for Planning Transparency (APT) response to
the consultation on the draft National Planning
Framework 2 document and accompanying Strategic
Environmental Assessment**

(Submission deadline 150408)

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1. Respondent Information

Action for Planning Transparency (APT) is a group composed of members of the public. The Objectives of APT are:

- **To** encourage honest and open debate between communities and planners;
- **To** create a focus for communities and a sharing of experience in planning matters;
- **To** raise public awareness of the planning process, and strengthen the participation of local people in all stages of that process.

APT is based in the Inner Moray Firth area of the Highlands of Scotland.

Given its aforementioned objectives, APT does not seek to 'represent' its membership and this response reflects a cross section of the views of members of the Management Committee only, as a group of people seeking to comment on the National Planning Framework for Scotland. It is anticipated that APT members will submit views on their own behalf as individuals.

2. Structure of APT Submission

In presenting this response to the **Draft NPF2** document, APT has set out to note and establish an understanding of the issues and perspectives as presented in the **NPF1 document**, the **06 Monitoring Report**, and the **NPF2** draft, with regard to the overall picture for Scotland, and the local area within that context. Responses are provided in categories with reference to sections from **NPF1, the 06 Monitoring Report and NPF2**.

This response also highlights concerns regarding the lack of meaningful engagement, involvement and participation of the public in the production of the proposals for the 'A96 Corridor Development Framework', between Inverness and Nairn that Highland Council has presented for consideration.

The **Strategic Environmental Assessment (SEA)** is discussed in a separate section, but comments are also incorporated throughout the document.

3. Introduction to NPF

It is the understanding of APT that the first draft of the National Planning Framework for Scotland, published in 2004, identified key issues and drivers for change; identified priorities and opportunities for different parts of the country in spatial perspectives, and set out a vision to 2025. It stated the importance of looking outwards and embracing the challenges and opportunities of globalisation and the enlargement of the European Union. NPF1 sought to bring an evidence based dimension to strategic planning to ensure that **resources would be targeted where they could achieve most**. The NPF also broke new ground in applying the principles of strategic environmental assessment (SEA) at a national scale. APT welcomes the use of an evidence based approach.

A monitoring report was produced to inform the review and revision process for NPF2 and NPF2 was published as per the original intention in 2008.

4 General Comments on the Presentation, Content and Consultation Timescale of the Draft NPF

The document is written in 'bite size' sections in a reasonable print size. However we have found preparing a response quite difficult and time consuming due to the sheer volume of factual information presented in the document and the inter-relationship between categories. Colours on Maps were hard to differentiate on occasions, possibly dependant on light levels in some cases. It was interesting to note that a significant proportion of the population of the Highlands and Islands live in the Lowland areas of Northern Scotland (Map 2).

Information is presented as factual description, which for the most part is accessible in terms of terminology, e.g. "*There are around 100 inhabited islands...*" (Para 16) However description in many other parts, for example on page 33, regarding 'Structural Funding' is less easy to comprehend without at least a little background knowledge.

We have experienced difficulties in obtaining relevant information for this response, and extensive background research is needed to compile an evidence based submission.

Despite the consultation period running from January to April, there still does not seem to have been enough time to prepare the depth of response that we would have wished in this timescale. We feel that alongside the 'normal' time constraints that members of the public and other bodies can have, pressures building within the planning system itself, both nationally and locally, have significantly hindered us in this respect.

Whilst we welcome all opportunities for involvement, members of the public and community groups are now being consulted on a broad range of documents. At various points through the January to April time period, members of our Action Group, through APT itself, and also through involvement with other groups and organisations, have been asked to comment on and become involved in a huge range of issues such as.

- Major planning applications such as the Inverness Airport Business Park application, with a large volume of detailed assessment documents and an exhibition. A range of other smaller but still complex planning applications.
- Exhibitions and meetings held by developers in relation to forthcoming planning applications. **We are extremely concerned that the public role in attending these meetings is, as yet, not clearly defined.** We are awaiting a response from the Highland Council with regard to interpretation of the participation locally, since we feel there has been an insufficient degree of transparency in this respect.
- A range of other consultation documents produced by both the Government and the Local Authority.
- Correspondence and telephone enquires coming into APT from the public.
- Meetings with senior Local Authority officials and councillors to discuss our numerous and as yet **unresolved concerns** on planning issues, plus related correspondence.
- Continuing detailed work on outstanding submissions to the Scottish Public Services Ombudsman.

5 Participation in the Development of the NPF; National and Local stages

National

With respect to NPF1; we would agree with a comment made that, "Development plans are just one of a large number of strategies and plans in a complex multi-sector and multi-policy level planning system. Whilst it is important that communities are engaged early in the development of Development Plans, it is equally important that they have the opportunities to become engaged in other plans, as so often the strategic policies are decided elsewhere". We believe a vital stage in the development of the NPF which we consider a weakness for NPF1 is the lack of community involvement. This has restricted the opportunity of the general public to work alongside other stakeholders in the preparation of this vision for Scotland. This is certainly reflected in the experience in Inverness. APT as an organisation has tried to encourage more widespread local participation in the draft NPF2 consultation.

Whilst we note the existence and content of the participation statements, published and updated as necessary on the website during the period that informed the preparation of NPF2, it is disappointing to find recorded that only 26 people attended the regional seminar in Inverness on 22nd February 2007, despite the existence of the 'communication strategy'. The evaluation responses further to that meeting in February noted that:

- More time was needed
- The presentation was too fast and difficult for non planners to understand.

Whilst a series of national conferences were held immediately after the publication of NPF2, there did not seem to be opportunity to hold any further targeted engagement with communities in our area after these conferences in 2008.

Currently the public participates in the planning system via Local Development Plans and through commenting on planning applications. The fact that legislation now requires planning authorities to take the NPF into account in preparing development plans, and the fact that the NPF will be a material consideration in determining planning applications has significant implications for the public's rights and involvement.

Local

We believe that communities likely to be affected by the Local Authority's proposals for the A96 Corridor (as mentioned in Spatial Perspectives section 272) were not aware of the fact that the Local Authority was seeking to influence the NPF2 in this respect and indeed awareness of the significance of the draft NPF2 with regard to the local planning process is extremely limited. Whilst we appreciate that Councillors were asked to approve a recommendation to seek to influence the NPF2, we are not aware of the existence of any guidance whereby the Local Authority is required to update the local community of its intentions in this regard. Given the statutory importance of such a unique and groundbreaking national document, we feel that it is a serious omission that guidance was not given by the Government to Local Authorities with regard to public involvement in this respect.

6 Comments on adequacy of community involvement in preparation of A96 Corridor Framework

We believe that the public has been placed at a considerable disadvantage by the way in which Highland Council has chosen to prepare its A96 Corridor proposals, during the Stage 1 period in particular, for several reasons, and these are confirmed by Highland Council documents and The Council's responses to questions that we asked within the Highland Council formal complaint's procedure. We assert that our ability to participate effectively, according to the spirit of PAN 81, within any participation statement in the forthcoming Local Development Plan process, through which this A96 Growth Corridor Development Framework Document has not passed, has therefore been compromised.

We believe that the quality of participation undertaken on the development of the A96 Corridor master plan in Stage 1 / phase 1 was inadequate. No community councils as formal bodies were involved at an early stage in the preparation of the plan, and references that were made to both Highland Councillors and our Elected Representative with regard to the involvement of community councillors were not in our view representative of the level of interaction that had taken place. A large part of the process was undertaken outside the Development Plan framework so the procedures and level of consultations are unclear, and many participants would not have clearly understood the place that the master plan for the A96 Corridor occupied in the statutory process.

By bringing forward this major strategy as SPPG (as a master plan), we believe that Highland Council has effectively denied the public the right to a **level of consultation**, and a **clarity of procedure** that would have been their right if the framework had been brought forward **at the time of its conception** within the full statutory development plan process. The level and clarity of the consultation process at Stage 1 in particular, when the important overarching principles of the master plan were set (including the recommendation that a new town should be built at Tornagrain) was not commensurate with the scale that would be required through the statutory process. Under the full statutory process various details regarding **plan preparation timescales**, and **notices of intent** would have been clearly defined.

The Highland Council has chosen to bring forward a major strategy (what is now described as The A96 Corridor Development Framework) as supplementary guidance under the 1997 Act, at a time when Scotland's planning system is undergoing its most radical overhaul in 60 years; and at a time when Scottish Ministers have stated their determination to make the planning system more inclusive and accessible to people, with greater openness and accountability in the decision-making process. A great deal of guidance on how to engage has been available to Local Authorities during this time, as indicated by the statements in PAN 81 with Council's being encouraged to build on existing networks. The interaction that took place with 'communities' when the proposal to build a new town was put forward could not be described as 'collaborative', in fact the meetings with government and regulatory bodies, and business, landowner and developer interests were called 'collaboration for success'. The public participated in a small number of focus groups at a later date.

The A96 Corridor master plan has already been listed in a report (under 'council policy') with respect to justifying the recommendation of approval of the Whiteness development when the proposals were, at that point, contrary to the Highland Structure Plan. The application was approved pending recommendation to be

referred to Scottish Ministers as a departure, and pending the resolution of roads issues.

7 Economy and Employment

We note that the primary purpose of the Scottish Government is to increase sustainable economic growth and that policy development and spending programmes will reflect this. We note that the NPF will take forward the spatial aspects of the Government Economic Strategy, to ensure that each part of the country *is able to play to its strengths* in building a Scotland that is wealthier and fairer, smarter and greener, healthier, safer and stronger.

We note the stated importance within the NPF of the Glasgow Edinburgh metropolitan region to the economy and note that a significant number of the national developments relate to this area. We note that Edinburgh and Glasgow have been identified as Metropolitan European Growth Areas (MEGAS) with potential for further development and both cities are strong knowledge economy centres in European terms. (See note 1)

We note that the NPF records that cities are key drivers of the economy and the hubs of wider regional economies

We understand that on the 03/07/2003, The Executive approved a £90 million growth fund aimed at improving the quality of life for the people who live in Scotland's six cities. This growth fund was divided amongst the 6 cities as follows: Glasgow £40 million; Edinburgh £24.2 million; Aberdeen £11.5 million; Dundee £9.3 million; Inverness £3.1 million; and Stirling £1.9 million. The City of Inverness was awarded approximately 3-4% of the £90 million cities growth fund; the percentage of the allocation from the fund seems to equate roughly to the city's percentage share of the six cities population. (See note 2)

According to the NPF with respect to our local area:

- Inverness is broadening its economic base and developing its role as the Highland capital. It is a key hub for Highland tourism and ready access to the environmental and recreational resources of the Highlands mean that it is able to offer a high quality of life. Its population has increased by a third since the 1970s, making it one of the fastest growing small cities in North West Europe. Sectors such as retailing, public administration and business services have expanded significantly. However, the city's economic base remains relatively narrow and there is a need to diversify and attract a wider range of high quality jobs. (Para 45)

The fact that the population of Inverness has increased since the 1970s does not imply that the rate of growth will be continued. There has been a surge of in-migration from Eastern European countries in the last two or three years, but as recent newspaper reports highlight, such economic migrants are now returning to their home countries. The city's economic base is indeed narrow, and there is no forecast widening that could support some of the population growth forecasts that are being made for the Inverness area.

However, NPF 2 notes that Inverness is a key hub for Highland tourism, with ready access to environmental and recreational resources which means that Inverness is able to offer a high quality of life. This has **therefore been identified as strength**, particularly since The Highlands, Edinburgh and Glasgow are Scotland's most popular tourist destinations. Paul McCafferty at Scottish Enterprise in Forth Valley said recently: "Outdoor sports and activity tourism is undoubtedly an area with significant growth potential for Scotland's tourism sector. We are a country fortunate to be rich in natural assets such as rugged landscapes and green forests which, with careful planning can be developed to attract more visitors and reap economic dividends". It is recognised that it is **the perceived high quality of life** that makes the area attractive to incomers.

We are disappointed, given that the Highlands already has the basis for a strong leisure and tourism economy, that very little that has been put forward for the HIE area and Highland Council area in particular which actually focuses on the further potential in this industry. Fort William's recent success in hosting the world mountain biking championships merits a brief mention in the NPF.

- The economic fortunes of the Highlands and Islands have turned round remarkably following a century or more of decline. The population has grown by around 20% and the number the number of people at work has gone up by nearly 50% over the last 30 years. The Moray Firth has experienced substantial growth, while Orkney and Shetland have benefited from oil related activity. The expansion of salmon farming, tourism, food processing, small scale manufacturing and service provision has contributed to growth in areas such as Skye, Mull, Arran, Wester Ross, Ardnamurchan, and Mid Argyll. The whisky industry continues to make an important contribution to the economy on Speyside and in parts of the West Highlands, Lerwick, Kirkwall, Stornaway, Thurso, Fort William, Oban, and Lochgilphead have grown as their roles as service centres have expanded. Early investment in new communications technologies has led to the creation of some 3,500 jobs in the teleservice centre. Progress has not however been universal. Some areas such as the Western Isles and parts of Sutherland and Caithness continue to decline. (See note 3)
- Rural areas have experienced major structural changes with the traditional sectors of farming and fishing now complemented by an expansion of employment in services, diversification into a wide range of new activities and the growth of the leisure economy. Since the mid-1960s, parts of rural Scotland such as Aberdeen-shire and many parts of the Highlands and Islands have seen a growth in population and jobs. (Para 48)

These growths in population and jobs should be quantified. In the Highlands and Islands the base figures are small, so it is relatively easy to generate a high percentage change. It is the actual base numbers that must count. Furthermore, many areas of the Highlands and Islands have seen marked decreases in population and jobs. Once again, the fact that the population of the Moray Firth area has increased in the last 30 years does not imply that the rate of growth will be continued. Much of the sharp step up in population was caused by the oil rig construction work at Nigg and Ardersier. This work is now long gone, and has been substituted by an increase in the service sector. This service sector work cannot be usefully increased – it already forms far too high a proportion of the economic activity of the area.

- Scottish Enterprise has identified business locations which have the potential to become the focus for key industries and clusters, and these locations can be grouped into broad economic development zones across Scotland, e.g. the Clyde Corridor, West Edinburgh / South Fife. In the Highlands and Islands Enterprise Area, Inverness and the Inner Moray Firth is a zone with similar characteristics. In addition HIE is placing strong emphasis on supporting economic and community development in fragile areas on the West Coast and in the Northern Isles. It is essential that investment in new or improved infrastructure takes account of economic development priorities. To be successful economic development zones will require good links to the rest of Scotland and the Wider World. If Scotland is to be attractive as a business location and tourism destination, the promotion of high quality environments and good transport interchange facilities at the air, rail, and sea gateways must be achieved.

The NPF needs to clarify and define these 'similar characteristics' with respect to Inverness and the Inner Moray Firth.

- Inverness and the Inner Moray Firth is an economic development zone with considerable potential, and to the east of the city, the A96 Corridor and the airport offer opportunities for future expansion.,
- Higher education has a key role to play in developing the knowledge economy in rural areas. The confederal UHI Millennium Institute with its constituent colleges throughout the Highlands and Islands is one of a number of pioneering examples, offering opportunities for people to study locally, developing international links and attracting students from around the world.

Inverness and the Inner Moray Firth may have economic potential, but it does not necessarily follow that the proposals currently put forward by Highland Council and partners will make the most of that potential. We are experiencing difficulty in sourcing information on proposals for either the college campus or a sports complex. On 14 March 2007 Councillors accepted that recommendation that *"priority development status be accorded to the proposed Inverness College/UHI Campus and associated amenity/sports provisions at Beechwood, to enable implementation of this strategic project prior to 2011.."*. Comment was made at that meeting that UHI had *"yet to complete a business case which showed that they were able to undertake these proposals"*. The land for the new campus (gifted by Government?) is currently landlocked and relies on the construction of the eastern section of TLR; we understand the estimated cost of which is £33 million and the work is timetabled between 2010-2012. HIE website indicates that they are seeking to appointment a 'master planner' by the middle of March 2008 for the campus site.

We are also having difficulty understanding the rationale behind the new college campus development, since it seems contrary to statements made in the 'Further Forward: Beyond 2011' section of the currently adopted Inverness Local Plan. Under the heading, 'A Competitive Place', we find the words, "a modern city campus comprising several new faculties, core facilities, extensive student accommodation along with cultural and leisure outlets – 'town and gown' in one place.

8 Households, Population, People, Place

According to the NPF:

- The population is ageing, with a growing number of people in the older age groups and fewer young people. The last census showed an 18% decrease in under 15s and a 29% increase in over 75s. The Central Belt has particularly high death rates and low fertility rates in comparison with the rest of Scotland. (Para 25)
- As in many other European countries, the population is ageing markedly. The changing population profile has implications for the provision of a range of public facilities such as hospitals, schools and colleges. The number of people over 75 is projected to increase by 81% over the period 2006 to 2031. Planning must ensure that the implications of our changing demographic profile are fully reflected in the provisions for housing and community facilities. It can be anticipated that over the next 25 years there will be a growing number of older people who are no longer able to drive. This reinforces the need to ensure that essential facilities and services can be accessed locally, without the need to travel substantial distances. (Para 91)

The ageing of the population is of particular importance in the Highlands. There will be a 50% increase in people of pension age. The pressure that this will put on already stretched medical and other services such as home care will mean that it will become a constraining factor on growth unless there is a massive investment in such support services. Such investment could only come from central government, because there will be insufficient economic activity in the Highlands to pay for the required services. **There will also need to be a more coordinated and pre-emptive approach taken with respect to the provision of social and health care services** and this should be a pre-requisite with regard to development planning.

- Sub-national population projections to 2024 – which will be updated in January 2008 to take account of the latest national population projections – indicate continuing growth in Eastern and Central Scotland and falls in population in Aberdeen and Dundee, parts of West Central Scotland and some of the remoter rural areas (See Map 7). The largest increases are forecast for West Lothian (+21%), Scottish Borders (+15%), East Lothian (+13%), and Edinburgh (+10%). Significant decreases are forecast for Aberdeen (-18%), Eilean Siar (-15%), Dundee (-14%), Inverclyde (-14%), East Dunbartonshire (-11%) and the Shetland Islands (-11%). The projected fall in Aberdeen can partly be attributed to outward migration across a tight city boundary. The population of Aberdeenshire is projected to increase by 5% over the same period. (Para 93)

These projections have now been updated by the General Register Office Scotland (GROS), and the NPF 2 document should reflect this. The Highland region is shown as having a 10.7% increase in population by 2031. However, this forecast is heavily dependent on the assumptions made about in-migration, which we comment upon below. If these in-migration figures are now reducing, as recent newspaper reports highlight, then the projection will prove optimistic. Furthermore, even if the 11% figure is sustained, it is far below the overly-optimistic assumptions being made by the development agencies in the Highlands.

- The fortunes of many parts of the Highlands and Islands have turned round dramatically in recent years, with many areas experiencing a growth in population for the first time in generations. Substantial growth is taking place in Inverness and the Inner Moray Firth, but population is also increasing in Skye and Wester Ross, Orkney, Argyll, Moray and Lochaber. (Para 94)

Substantial growth may have occurred in the Inverness and Inner Moray Firth area, but it does not follow that this rate of increase will be sustained. The urban housing development that has taken place around the growth that has occurred in Inverness over the past number of years has suffered from a dearth of community facilities.

- In-migration of people of working age has reversed population decline in the short-term and is making a valuable contribution to Scotland's economy. Greater freedom of movement as a result of EU enlargement has created opportunities to attract and retain people with the skills and abilities needed to develop key sectors of the economy. Higher sustainable economic growth will help to retain and attract more people of working age. (Para 95)
- While there is a risk that an ageing population could lead to lower activity rates, a less entrepreneurial society and skill shortages, more people are now able to lead an active life after the traditional career span. This offers scope for measures which make it easier for people to continue to participate in the economy beyond retirement age. There is also significant potential for improving on the relatively low activity rates in parts of West Central Scotland. The growing number of affluent and mobile pensioners will have implications for our transport systems. (Para 96)

It would be good for the NPF 2 document to include a substantiation of the assertion that an ageing population could lead to lower activity rates. Surely a more accurate statement would be to say that it will lead to lower activity rates? Why would people who have reached retirement age wish to continue working if their economic well-being is assured at this stage in their life? This is a particularly important factor in the Highlands, where a significant proportion of the present in-migration consists of people retiring to the region because of its many attractions and (*in relation to England*) low house prices.

- The number of households is continuing to increase and that has implications for housing and infrastructure. There are also potential implications for energy demand and associated carbon emissions which will have to be taken into account. The average household size is projected to drop from 2.22 people in 2004 to fewer than 2 by 2024. Over the same period, the number of households is projected to increase by 13% to 2.5 million, an average of 14,800 additional households per year. These projections – based on 2004 population projections - will be updated in spring 2008 to take account of the latest, higher 2008 based population projections and are likely to indicate a higher rate of household growth over the period. The number of households headed by someone aged 85 or over is expected to double between 2004 and 2024. (Para 97)

Inverness is sometimes said to be the fastest growing city in Scotland. In truth it is the fastest growing housing estate in Scotland. This cannot continue, as without the economic activity to sustain all of the householders, whereas the number of people in the households may decrease, a natural limit on the number of houses required will soon be reached. There are signs that it is already being reached in the Highlands, with developers having difficulty in selling their newly built houses.

- In the 2004 projections almost all local authority areas show projected increases in the number of households over the period to 2024 (See Map 8). West Lothian is expected to see the largest increase (+34%). Edinburgh, the Scottish Borders, East Lothian and Fife all have projected increases of between 21 and 23%. Significant decreases in the number of households are forecast for Aberdeen (-6%) and Dundee (-5%). (Para 98)

See comment at Para 97

- These trends have important implications for development in the period to 2030. Increases in the number of households will translate into a requirement for additional houses, not all of which can be accommodated on previously developed land. Household projections do not identify the number of households that are prevented from forming through the absence of opportunity to do so. They are therefore likely to underestimate the number of households that could form over a given period. Moreover, population and household projections are based on extrapolation of past trends and should be regarded as indicative rather than as intimations of a predestined future. It is particularly important to note that the Government's aspirations for Scotland – reflected in targets for greater economic and population growth – imply higher overall household growth than current projections indicate. Planning for housing should reflect the need to accommodate this. The recoveries evident in areas as diverse as Glasgow and Skye point to the scope for turning round areas which have experienced substantial decline. (Para 99)

The recovery for Skye is being over-emphasised in the NPF 2 draft. The present population is tiny in relation to the whole of Scotland, and it only takes a small change to give a large apparent percentage increase.

- The planning system will need to ensure that the supply of land for new housing development in an area is adequate to meet the housing needs of that area in full and that the land is made available in good time, that new residential development is of a high standard and sustainable, and that there is adequate provision of physical and social infrastructure - affordable housing, high quality schools and services. It will also be important to ensure that the right houses are built in the right places, taking account of changing household composition. (Para)

All of this is relevant. However, defining what is 'adequate' in terms of such provision is critically dependent on the accuracy of the population growth projections. In the case of the Inverness and the A96 corridor, and the Highlands as a whole, the projections being made by the development agencies are far from realistic, thereby generating the danger that housing and facilities will be provided, but the need for them will not arise.

- What is critical, however, beyond the stated ambition at a national level, is that enough houses are built of the right type and in the right places. Achieving this will require high quality strategic planning for housing and the setting of realistic housing supply targets through the Local Housing Strategies and development plans of local authorities. New Government guidance on the strategic assessment of housing need and markets will place a much stronger emphasis on local authorities working together at a regional level to build a stronger, more strategic evidence base. The Government's evidence base will also be strengthened by the commissioning of an economic model of the housing market that will strengthen our forecasts of future affordability at the sub-Scotland level. (Para 170)

There is regrettable tendency in the Highlands for development to be developer led, rather than being planned by the authorities. The statement in NPF 2 that the Government guidance will place a much stronger emphasis on a stronger, more strategic evidence base is very welcome. As before, however, such evidence that will be produced on population growth projections will need to be explicit, and fully open to public scrutiny.

- New houses should generally be built in and around existing settlements, making best use of brownfield land and existing infrastructure and minimising the need for commuting. However, in those parts of the country where the pressure for new housing is greatest some settlements will need to expand substantially and, in some situations, the creation of an entirely new, stand-alone settlement may be the best option. Under its Scottish Sustainable Communities Initiative, the Government is inviting proposals for the creation of sustainable communities as exemplars of 21st Century low-impact development. These proposals should reflect the principles set out in *Designing Places* and embrace the concepts of sustainable urbanism. In essence this means development which helps to meet regional housing and economic needs; incorporates a mix of tenures and house types, including affordable dwellings; seeks to integrate land uses, including active and amenity open space; includes SMART measures to encourage more sustainable travel; provides opportunities for walking and cycling; and makes innovative use of renewable and clean energy technologies. (Para 173)

The point that new houses should generally be built in and around existing settlements seems lost on the Highland Council. The Council's present development focus on Inverness and the A96 corridor completely ignores the case for development in the other, long-standing settlements in the Highlands: Beauly; Dingwall; Alness; Tain; Wick and so forth. Furthermore, the population growth figures that are being projected (+30000 over the next 30 years) are completely over-estimated. An increase of less than 10,000 is much more realistic. That being so there is absolutely no case that can be made for the creation of a new town, as is presently being proposed at Tornagrain.

- HIE considers that half a million is a realistic population target for the Highlands and Islands, an increase of around 15% on the population in 2005. The provision of development infrastructure will be an important issue where substantial increases in population and households are projected. There is a need to develop models of sustainable development which are applicable to the geography and settlement pattern of the area, including the needs of island andcrofting communities. (Para 270)

Given the information from the NPF documents and other material we find it difficult to understand the statement made at Para 270,

- *“HIE considers that half a million is a realistic population target for the Highlands and Islands, an increase of around 15%”.*

It represents a projected growth figure of 0.6% per year for 20 years for the Highlands, compared with the GROS projection of 0.42% per year for 25 years. Also **no time period was quoted against this statistic in the draft NPF2 text.**

HIE has represented that a figure of 500,000 is something to be aspired to in order to achieve ‘critical mass’, this figure is not directly supported by GROS projection. We wish to question whether or not this is truly achievable by 2025. (HIE area includes Argyll and Bute, Moray and the major Islands). This makes it necessary to increase the population by some 60,000 in total over the whole of its area in 20 years from 2005.

However, according to our review of the latest GROS projections (based on 2006 figures, the sub-national population projections which were updated in January 2008) this population increase may only be achievable over the HIE area if a High Migration Variant is taken. We understand that the most significant impact on the population is likely to be through migration rather than natural growth.

HIE itself recognises that official projections show a growth rate significantly below that which HIE wishes to achieve although they perceive that the estimates have been getting closer to their targets year on year. HIE have identified 5 sectors which can contribute to population growth, including migrant workers, young people, and the Islands and fragile areas.

- *Within this context of growth, Inverness needs to develop its role as the Highland capital, broaden its economic base, improve its connections to Scotland’s other cities and the rest of the world, and attract a wider range of high quality jobs. The city is home to Scottish Natural Heritage and its Centre for Health Science is contributing to Scotland’s strength in biomedical research. (Para 271)*

Please refer to section on infrastructure with regard to ‘improving connections’.

- *The A96 corridor between Inverness and Nairn is the main focus of growth in the Inner Moray Firth. Highland Council’s *A96 Corridor Development Framework* includes proposals designed to accommodate an additional 30,000 people in the area over 35 years. These include the creation of a new settlement at Tornagrain, significant expansion at Nairn and to the East of Inverness, a residential and marina development at Whiteness. Development on this scale will require the upgrading of the A96, improvements in public transport services, substantial investment in water and drainage infrastructure and the creation of supporting green infrastructure. The strategic transport partnerships for the Highlands and the North-East have worked with Transport Scotland on a study of the Inverness to Aberdeen transport corridor which will inform the Strategic Transport Projects Review. (Para 272)*

In 2001, the measured population of Inverness and its environs was 66,576. In proportion, the growth rates contained within HIE papers (*see comment at para 270*) and other 'aspirational' documents such as the Inverness City Vision would increase this by 11,437 people by 2030. The GROS growth projection would increase the population in proportion by 7,526. Even at the inflated aspirational growth rates, the growth figures fall far short of the 30,000 growth figure being promoted for Inverness and the A96 corridor. There is no case for a new town such as Tornagrain.

Highland Council's recently published brochure for the A96 Corridor Framework stated:

- *"Highland Council's A96 Corridor Development Framework includes proposals designed to accommodate an additional 30,000 people in the area over 35 years";* (the 'area' in this instance being the A96 Corridor).

However this published framework covers the period from 2011 to 2041, some **30** years. GROS gives only sub national statistics to 2031 and based on a High Migration Variant, this would give approximately an additional 26,000 over the whole Highland Council area to 2031, not simply the A96 corridor.

Highland Council has stated that,

- *The suggested increase of 30,000 people has underpinned the proposals set out in the master plan process...*

And,

- *"... perhaps more importantly, the rates of growth envisaged for the city and surrounding area came out of the aspirations for a 'critical mass' to be achieved..."*.

Thus there is a link between the desire for critical mass in the HIE area and the plans for growth in the A96 Corridor; but this critical mass seemingly does not include the additional population increase needed over the period from 2025-2041 and beyond to fill the development created by the Framework. Highland Council needs to look well beyond the HIE timeframe to attempt to achieve its aspiration for 30,000 people to reside in the Corridor alone.

The Highland area itself includes North to Caithness and down to Lochaber and the Cairngorms and across to Skye, and we have no idea what the population share would be across these areas as yet, but a retrospective view can be obtained from the HIE operating plan. **Consideration of the Population share is important** given that sections 273 to 280 are aimed at increasing prosperity throughout the HIE area, and the increase in population in areas such as Wester Ross, Skye and Lochaber is noted in NPF 2.

So, it is the case that the Highland Council's A96 corridor development plans ignore the fact that the most likely source of in-migration is from the outlying communities of the Highland region. Encouraging them to come to new towns in the A96 corridor is exactly counter to the Highland Council's policy to decentralise and so support these remote communities (fragile areas programme). Furthermore, opportunities to encourage growth in those local communities to offset the present population trends there are dismissed almost casually. Even growth in the other Inner Moray Firth townships is not promoted: Invergordon; Alness; Dingwall; Beaully and so forth.

Arguably this singular emphasis on the A96 corridor is irrational, and will be to the significant detriment of the more remote communities. **We would seek to question therefore why there should be development of this scale in the A96 Corridor.**

Population is predicted to fall post 2036 and of course the area is very much at risk from any changes in migration patterns or numbers. According to an observation of the GROS figures, the Highlands seem to take a rather large share of Scotland's immigrant population and we wonder if this can be sustained. If the GROS principal figures are used the population increase over the whole of the Highland Council area to 2031 is given as 15,824. We appreciate however that household projections are based on past trends and should be regarded as indicative rather than as intimations of a preordained future, but any local desires should be grounded in reality.

Apparently, strong economic growth is taking place against a background of population decline in Latvia. **(Monitoring report)**

- Targeted support will continue to be needed in areas such as Caithness and some of the islands, which are still experiencing decline. The challenge in the remoter areas is to replicate the successes already achieved in places like Skye and Mull. Through the fragile areas programme, Highlands and Islands Enterprise and local authorities are giving particular attention to the needs of the Outer Hebrides, North Skye, the outlying islands of Orkney and Shetland, the Argyll islands and the remote west mainland (see Map 9). The Government is pursuing the introduction of Road Equivalent Tariff (RET) for ferry services and seeking to improve access and connectivity by promoting innovation on existing ferry routes and new or shorter crossings to the islands. (Para 277)

See comments at paras 99 and 272.

- Housing supply is under pressure in many areas. Economic, financial and demographic factors have fuelled the demand for houses to buy, driving up house prices. Since 2002, all parts of Scotland have experienced house price increases at a rate well above the growth of average earnings. In Edinburgh and the Lothians, Perth and Kinross and the Highland Council area prices are now more than 4 times average annual incomes (see Map 4). The sustained house price increases in recent years have not been met with any significant increase in the overall supply of new housing. While house prices were 72% higher in 2006 than in 2002, the level of new build increased by only 2%. (Para 53)

While ambitious population growth figures are being forecast for the Inverness and A96 corridor area, and indeed the whole of the Highlands, no projection is made as to how the houses for these extra people are to be afforded. Wage rates are low in the Highlands region, and with house prices already more than 4 times the average annual incomes, the non-affordability of housing will be a significant constraint on population growth.

9 Transport

According to the NPF documents:

- Executive's transport policy is based on supporting the promotion of economic growth, promoting social inclusion and accessibility, ensuring that the development of transport is sustainable and minimising the environmental impact of travel. Improvements in sustainable transport; targeted improvements on the motorway and trunk road network and stabilising road traffic volumes over the next 20 years are seen as priorities. The volume of traffic on Scotland's roads has grown by 18% between 1993 and 2002. (NPF1)
- We need to make journey times faster and more reliable; make connections which build and sustain economic growth; provide travel opportunities for employment, business, leisure and tourism; and improve links between cities towns and rural communities throughout the country. (Para 192 NPF2)
- For the period from 2012 to 2022, the strategic Transport Projects Review (STPR) will develop a programme of interventions, based on an analysis of key corridors, the urban networks of Glasgow, Edinburgh, Aberdeen and Dundee and the strategic nodes of Perth and Inverness...The NPF is informed by the work being undertaken on the STPR, which will report to Ministers in the summer of 2008. (NPF 2)
- Transport Scotland, assumed responsibility for directing the Executive's £3 billion programme of investment in road and rail improvements in January 2006. (Monitoring Report)

Access to the Highlands via the A9 and A96 (or indeed the A82) is neither quick nor safe. Businesses both in and out of the area cite the inadequacy of the road system and journey times as detrimental to the local economy. But there are also internal connectivity issues. The A9 is the main trunk link road from the Highlands to the areas of economic activity in the central belt. The scale of economic activity and internal markets within the catchment area of the A9 is small (likewise the A96). There are limited local markets with few individual companies of scale. (HIE survey on business perceptions of roads carried out in 2006) This may present difficulty in presenting an economic case in terms of cost benefit analysis for complete dualling of the route.

The A9 and A96 are largely 1970's solutions to the traffic issues at that time. The A9 exhibits a variety of standards including dual and single carriageways and a variety of junctions and minor accesses which intersect with the road along the entire route. There are limited overtaking opportunities resulting in convoying, and the route has a significant record of fatalities. Visitor numbers are predicted to increase demand on the route, and responsible and environmentally friendly development of the tourism industry would increase economic prosperity, and road upgrades should enable the locality to take full advantage of these possibilities.

The latest news we can find from 07/03/2008 indicates that the next section of the A9 to be considered for dualling is being investigated by Transport Scotland. The national transport agency has been asked by Transport Minister Stewart Stevenson to take forward the next stages of feasibility work for the dualling of the 18 miles of the A9 between Perth and Pitlochry. The first stage of this design work focuses on the stretch of road between Luncarty and Pass of Birnam. This work will inform the Strategic Transport Projects Review (STPR) which is due to report in Summer 2008.

Transport Minister Stewart Stevenson said: "The A9 is crucial to economic development in the north of Scotland. We made the commitment to plan for dualling the A9 when we came into office and today's announcement is a major step forward in that process. I asked Transport Scotland to identify the next possible stretch of the A9 to be dualled and these designs will now look at ways to widen the carriageway, close the central reservation gaps and introduce grade separated junctions" We note the use of the phrase, "commitment **to plan**".

The development proposals for the A96 Corridor will in our view not only necessitate upgrade of the A96, but surely, and more importantly for the economy, a significant upgrade of the A9. All currently available information indicates that progress to improve safety and journey times on this main economic artery will be slow and therefore in our eyes will not keep pace with any development proposals which may be given the go ahead in advance of infrastructure provision. It was noted in the NPF Newsletter No 1 Spring 2007 under connectivity that NPF2 should consider "A9 corridor as a priority", and "upgrading of the A82 as a priority".

It is highly likely that the concentration of development set out for the A96 Corridor - the proposed New Town at Tornagrain; Whiteness development; Inverness Airport Business Park, Proposed expansion at West Nairn and East Inverness; Campus for UHI; and a regional sports complex - would result in the capacity of the A96 being exceeded by both cars and service goods vehicles at some point (according to consultants figures which are obtainable from the Highland Council website). It is not clear **as to when or if** infrastructure will be provided to support such a level of development and provision of infrastructure will be a pre-requisite.

We hope that focusing development on the areas along the A96 Corridor necessitating upgrade of the A96, will not impact adversely on much needed upgrading of the A9 thus creating a potential conflict within the area. We read that the Strategic Transport Projects Review is allowing a whole range of schemes, important to communities and businesses across Scotland, to be judged not only on their local merits but alongside national transport priorities. We hope this will provide clarity and a positive result in terms of the prioritisation of a total upgrading of the A9. It will be interesting to note just how our roads are judged.

The NPF is informed by the work being undertaken on the STPR, which will report to Ministers in the summer of 2008. (NPF 2) **We are at a disadvantage since the results of the STPR are not available to us at the time of this consultation.**

There are significant local concerns regarding congestion and road safety as the A96 Passes through the town of Nairn. A town bypass is included in the A96 Corridor framework, but it is indicated within the Framework that no work is timetabled to begin on the bypass until 2021 and those **concerns and dangers** will no doubt be exacerbated as further housing developments take place in other areas of the A96 Corridor, with increased traffic volumes. The creation of a by-pass around the town of Nairn is not without problems given that it has the potential to 'cut off' Nairn, thereby potentially causing loss of business, whilst destroying forever the open space around.

'The Aberdeen to Inverness Transport Corridor Study' shows that the most significant traffic volumes within the corridor are seen between the Raigmore Interchange and the Inverness Retail and Business Park, which is on the eastern side of Inverness. The Faber Forecasting Report focuses on accommodating **new** traffic on the A96 network. However the projected networks developed by Faber highlight the tremendous strain that development along the A96 Corridor will place on the Inverness network more generally. Given that these projections are looking at the Masterplan proposals in isolation, it demonstrates the acute pressure that the road network in and around Inverness will be placed under when the city wide future plans are also factored into the equation.

We understand from the NPF conference in Inverness in February 2008 that a decision on the A82 will emerge from the STPR. We are also confused by references to scheduling regarding the Inverness Trunk Link Road and the Nairn bypass when surely the scheduling would be an outcome of the STPR?

With respect to railway improvements and the proposed Dalcross rail halt we note that:

- John Swinney MSP sent the Scottish Minister's High Level Output Specification (HLOS), for the period 2009-2014, to the Office of Rail Regulation on 13 July 2007. (See note 4)

This HLOS noted in terms of the Highlands:

- "Infrastructure enhancements required to permit an hourly faster service between Edinburgh and Glasgow and Inverness serving Perth as recommended in the Room for Growth Report and incorporated into the Scotland RUS".
- "Infrastructure enhancements to permit an hourly service between Aberdeen and Inverness" ('General' – to improve times and service frequencies for either passengers or freight)

These enhancements for the Highlands are listed as **Tier 3** with all the attendant provisos, namely that tier 3 represents "*the further outputs that Scottish Minister may wish to implement to respond to the requirements of the National Transport Strategy. It is recognised that at the time of delivery of this specification the outputs and delivery mechanisms have not been fully developed. Funding for implementation will be provided by Scottish Ministers subject to affordability and the availability of resource of capital*".

Transport Scotland has informed us that:

- *“We will consider the possibility of a station at Dalcross, serving Inverness airport, as part of a package of proposals for the Aberdeen – Inverness line, following the outcome of the HLOS process and through the Strategic Transport Projects Review (STPR). The HLOS affordability process is ongoing with the Rail Regulator and is not expected to be complete until autumn this year”.*

Hence a great deal of work still needs to be done before any work can commence on line improvements or indeed the provision of a rail halt. Whilst much is being made of the need to have a rail halt at the airport, a case should also be made for East Inverness, which has already expanded significantly in recent years and this trend is set to continue as part of the A96 Corridor Growth Development Framework.

There is every indication that in order for economic growth to occur and most importantly for the existing economy in Inverness to remain undamaged in the face of any further developments being undertaken, then **significant** infrastructure investment must be made to include improvements to **all the major trunk roads**, the building of the Trunk link Road, and investment on the rail network.

10 Infrastructure

- In terms of water and drainage, between 2000 and 2006, around £4 billion was anticipated to be spent on new and improved infrastructure. The primary focus of the then current investment programme was on improvements to existing infrastructure and meeting standards. However lack of capacity was noted as being a significant constraint in parts of the Highlands as well as elsewhere in Scotland. (NPF1)
- **The Monitoring Report** highlighted that Scottish Water was in the process of identifying its priorities for investment in water and drainage infrastructure in the period 2006 to 2014. Scottish Ministers had set Scottish Water the objective of providing sufficient infrastructure capacity to meet all estimates strategic development requirements over the period to 2014.

Scottish Water’s website lists details of the £200 million worth of improvements that will be undertaken in the Highlands in the current investment period through to 2010. We can find no firm details of provision in respect of the A96 Corridor other than the fact that Ardersier and Nairn will share £3.1 million pounds on wastewater upgrade sometime before 2009, and this may not be related to future plan provision. We understand (from a recent newspaper article) that Scottish Water representatives attending a community council meeting at Ardersier would not be drawn on speculation that waste from all the new developments along the A96 Corridor was to be pumped to Ardersier. Perhaps because answers to such questions at this point would require a degree of speculation since we are looking at far future developments that may not occur. We understand the next investment period runs from 2010-2014, and wonder whether any growth funding will be included for the A96 Corridor?

The A96 Corridor framework brochure shows only two WWTW one at Ardersier and the other at Allanfean (which is nearer to East Inverness).

We are concerned by comments made in the Scottish Water interim report, phase 3, (which is found in the A96 Corridor Section of the Highland Council's website). These comments relate as follows:

- The conclusions at this stage of the study are that development will become constrained by reliable raw water availability, treatment capacity and water supply networks in the near future.

With respect to the SEA; we agree with the statement that development along the A96 Corridor has the **potential to** contribute to increase levels of diffuse pollution and **put pressure on water supply and drainage infrastructure**. However we cannot agree that the master planning exercise has taken this fully into account and no significant adverse effects are anticipated, for various reasons some of which appear above.

11 Environment and Land

- Scotland...has a land area of 78,000km²...only 6% of the land area is classed as prime agricultural land.

We understand that development of greater than 10 hectares no longer requires notification to the Scottish Government and Councils now make their own decisions on the use of prime agricultural land.

We have included (as note 5) extracts from The Report on the Current State and Threats to Scotland's Soil Resource September 25, 2006. We are particularly troubled by the statements that:

- Data on the loss of land and soil as a result of development is not collected in a consistent manner either at the national or regional level.
- Based on the limited information available, land appears to be being developed at a higher rate than at any time during the last 50 years; this raises questions about the sustainable use of resources and whether soil is being recognised and protected by the planning system.

This has particular relevance in Scotland given the good quality soils here relative to other areas in the UK.

- In their rich diversity, Scotland's landscapes are a national treasure. They provide context for our daily lives, and are a major attraction for our tourist visitors. The effect on landscape character will be an important consideration in decision-making on renewable energy developments. The aim should be to build environmental capital and pass well managed, high quality landscapes on to future generations. (NPF1)

With respect to the planned expansion in the A96 Corridor:

We appreciate that the SEA acknowledges that the high levels of development proposed along the A96 will result in soil sealing. However we would seek to clarify, “this has been minimised as far as possible...” We would challenge why this soil sealing should be compensated for, even ‘to a degree’ by “strategic green network protection and enhancement planned as an integral part of the development”. It is the overall impact of all the building work as a whole that should be considered and not just that which is used for ‘built development’. Development with ‘soft end use’ such as golf courses, playing fields and parks have different interactions with soil functions during both constructional and operational phases. The impact of aspects of the ‘Green Framework’ in itself should be looked at, rather than it being considered as a ‘mitigating measure’.

We are pleased that the SEA draws attention to the fact that no explicit advice is provided on the need to protect the character of existing settlements. We consider the preservation of the character of existing settlements given the potential for permanent long term impacts on the landscape to be important, and would hope that this omission is corrected.

- [The deep water of Scapa Flow is a major strategic asset. Through the fragile areas programme, the enterprise network and local authorities are giving particular attention to the needs of the Western Isles, North Skye, the outlying islands of Orkney and Shetland, the Argyll islands and the remote west mainland.](#)

The potential for a container transshipment terminal at Lyness on Hoy is being pursued by Orkney Islands Council, in collaboration with HIE and Crown Estate involvement. However the SEA statement is of particular importance here, given that whilst the benefits of brownfield site redevelopment would be positive, the negative environmental impacts would be significant.

12 Sustainability

It seems that in today’s terms sustainable development is seen as concentrating high density housing in the smallest possible area. On the Scottish executive website sustainable development is quoted as

- [“The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations”.](#)

This is dated December 2005.

In the following an attempt shall be made to show that in today’s economic climate, the aspirations of the Highland Council in their promotion of the A96 Corridor, and in particular the proposed New Town of Tornagrain within the Corridor as a site for sustainable development, has not properly considered the term ‘sustainable’ in relation to development in the future within the Highland Council area.

Fossil fuels are a finite resource and as suggested in NPF2 world production may peak before 2020. There is no doubt that as a finite resource production must peak at some point and thereafter the accessibility of these fuels, oil being the most important to today's economy, must be reduced. (Ref. NPF2 Paras 82, 84 and 85)

Dependency on oil is greater now than even 30 years ago. An acknowledgement of the above by the government is highlighted by various campaigns urging us to conserve energy, for example by using public transport, and by production of sustainable energies from for example wind farms.

The proposal by Highland Council to site a business park (which is already in the current local plan) next to an airport, which one assumes was, at the time of the proposal, to be the preferred method of transport, seems now to be at variance with the current thinking on cost and availability of fuel in the future.

At present and historically the Highlands has been dependant on importing a great deal of the raw materials that have been used in industry and therefore increasing the carbon footprint of many manufacturing processes. Options which would reduce this footprint, using materials available locally and which could either be sold locally or transported in an economical manner would be far more **sustainable** and would comply far more effectively with paras 82 and 84. It is interesting to note that the importing of materials is considered of great disadvantage to the Icelandic economy, an economy whose successes it is understood, the Scottish Government is trying to emulate.

Highland and Islands Enterprise have stated that a realistic population target for the HIE **area** is 500,000, an increase of approx 60,000 by 2025. Highland Council has stated that they anticipate the population of the Inverness region to grow on a par with the huge rates of growth seen since the 70's, and that 30,000 will be accommodated in the A96 Corridor in the period through to 2041, (although in the framework the timescales are variously quoted as 35 years and 30 to 50 years). Please refer to earlier comments on population. (NPF2 Para 270)

To propose to concentrate such a significant proportion of the desired population increase within such a small area, building upon good quality agricultural land seems to be in complete contrast to the idea of sustainability particularly in terms of food production locally.

A rise in population is indicated primarily as a result of in-migration from Eastern Europe - with this population increase falling again by 2076. We seek to question the wisdom of using good agricultural land for building, (in the case of land that would be used in the creation of a new town at 'Tornagain' within the A96 Corridor) in order to satisfy a potentially non-sustainable increase in population, thus negating the future use of the land for food production. (NPF2 Para 90)

NPF2 Para 85 warns against inaction in terms of reducing greenhouse gas emissions. Therefore to continue with the proposal to build on good agricultural land, which in the future will substantially increase in worth for food production, would be foolhardy in the extreme.

Substantial changes to minimise the impact of climate change and fossil fuel usage which would spread the economy and the related benefits throughout the Highlands and Islands would indeed bring substantial benefits to the quality of life of many people, not only in health and environmental quality but the benefits of living and working in smaller communities with the additional ability of providing a large proportion of for example food from the local area reduces the carbon footprint and dependency on fossil fuels. Many of the Highland communities are within reach of small harbours and this again is a bonus in terms of potential sustainable transportation and travel in the future. Although we do concede that there are also negative environmental impacts associated with use of harbours.

- ‘The government is committed to reducing regional disparities and ensuring that growth benefits the whole of society’ and ‘It will be important to ensure that communities undergoing regeneration enjoy good access to the opportunities being created in strategic growth areas’. (NPF2 Para 158)

In the light of these two statements and, given the unique geography of the Highlands and Islands, action taken now to create strategic growth areas throughout the Highlands and Islands should benefit all existing communities, whereas the concentration of a strategic growth area in the A96 Corridor could in effect precipitate another ‘Highland Clearance’; it would be much more sustainable in the long term to promote many smaller centres of population and economy all around the Highland Council area.

Sustainable transport and land use - recognises strengthening water based networks. In this area these are the Caledonian Canal, and various harbours both locally and Highland wide. Inverness Harbour and the port of Invergordon are both used to some extent commercially at present, but the facilities are already there to provide a more **sustainable** method of transport now and for the future should industrial and business development be sited in these areas instead of next to an airport whose sustainability in the long term is now questionable. (NPF2 Para 219, 225 and 274)

Building a better roads infrastructure does not encourage sustainability in the sense of conserving fossil fuels nor with respect to climate change - this can only be promoted by, for example, water transport or use of rail for commercial users and the need to discourage the use of cars in a proactive way. There are also issues of capacity in the public transport network, and as yet unexplored avenues of partnership working between employers in terms of integrating and sharing transport strategies to ensure that employees can reach their place of work happily, safely and on time.

With reference to the Caledonian Canal as a means of transportation, Scottish Water have stated that the existing water supplies for this area are nearly at capacity and Loch Ness has been proposed as one source for abstraction to fulfill future needs. At present water is abstracted from Loch Ness on a nightly basis by Hydro Electric and returned the following day via turbines. The level of the Loch can fall by as much as 5 inches during this time. This brings into question whether the Caledonian Canal will then be able to function at all if abstraction for water supply is continued on a daily basis, given the then potentially reduced levels of Loch Ness. (NPF2 Para 238, 239 and 241)

With reference to water supply in this case; to say investment programmes are being undertaken is all very well, however the question that should be asked first is - is there enough raw material economically and sustainably available to provide the infrastructure required for such as the A96 corridor? The answer may well be no. This should be considered now.

In the respect of the A96 Corridor infrastructure, and in particular water supply and sewage disposal, no proper consideration has yet been given to the sustainability of the proposal. A proposal should not be considered until all aspects of its sustainability have been confirmed rather than being part of a wish list for the future. Para 238 and 241

NPF2 Para 122, 136, 137and 138

To concentrate a large population in a small area may, in theory, be 'sustainable'. However in terms of waste removal and disposal it concentrates large quantities in an area where it would become more and more difficult to dispose of such waste. Smaller dispersed and more self sufficient communities would find it easier to dispose of waste in, for example, facilities which convert the waste to heat/energy enough to use in a small community.

Biomass heat plants require timber to be transported over often great distances and should they be proposed, as may be the case by Moray Estates for the Tornagrain development, the transportation of timber by road completely negates the benefit of using biomass for energy production. Para 136 states that a great deal of timber cannot be harvested economically because of access constraints - an obvious oversight when planting - potential oversights in the future in the siting of biomass energy production plants should also be given great attention.

Para 150 states the main elements of the spatial strategy are to: support strong, sustainable growth for the benefit of all parts of Scotland; support sustainable growth in the rural economy and to promote more sustainable patterns of transport and land use.

In the case of Highland council requesting that the A96 Corridor be included in the NPF, no consideration has been given to the above, particularly in relation to the sustainability of the rest of the Highland area.

Para 155 states that key locations have substantial strategic growth potential, but in the case of the A96 Corridor this would probably be at the expense of the rest of the Highland Council area, resulting in the greater part of the Highlands being rendered unsustainable.

Para 160 concerns sustainable growth - almost no provision has been made by Highland Council in respect of this Para and by promoting the A96 Corridor it is negating the true sense of sustainable growth in the Highland Council area as a whole.

Para 100 states that new residential development will need to be of a high standard and sustainable - a zero carbon footprint is only achievable if building regulations are changed dramatically to incorporate this principle with due regard being given to planning from now on. For example home grown timber and materials sourced locally to this end. Historically, buildings have been made using local materials and it is only relatively recently that materials have been transported great distances. Much more lateral thinking should be used to make greater use of local raw materials and plan for growth and production of same now for use in the future when a depletion of fossil fuel resources will preclude economic transportation over long distances of materials used in construction.

Para 100 also states it is important to ensure that the right houses are built in the right places.

In presenting their case for the A96 Corridor for inclusion as a National Development it seems that Highland Council, among others are quite simply looking at the suggestions for sustainability contained in NPF2 and 'ticking the boxes' as much as possible to come up with justification for future development. This is apparent in their submission to NPF2 which was approved by Councillors at the PED meeting on 19th March 2008, which asks for the A96 Corridor to be considered as a National Development.

Highland Council should instead be looking to protect and represent the whole of the Highlands for future sustainability. We are, after all, at present only the caretakers of our land for future generations.

With regard to the SEA in terms of promoting the development of a sustainable settlement pattern and physical infrastructure; we wish to challenge the statement made regarding the A96 Corridor master planning.

We understand that it is good practice to carry out the sustainability appraisal at the same time as the SEA - the earlier in the master planning exercise the SEA is carried out 'the better'. The early stages of the master planning exercise for the A96 Corridor apparently reviewed 8 options using a 'Smart Growth Sustainability Appraisal Matrix', from which a single 'preferred option', was selected. This preferred option was focused mainly on the location of the new settlement at Tornagrain. The SEA was then carried out on this one chosen plan. We feel this is a weakness.

With respect to reduction in energy consumption and / or carbon dioxide emissions; we have concerns with the statements regarding the integration of proposals with the rail transport network. In the first instance we are trying to obtain confirmation that the necessary provision of a **new** rail halt and / or **improvements to the rail line** will indeed be forthcoming. Secondly we are uncertain as to how close the new town areas will be to the proposed rail halt – on average, over a wide range of circumstances, around 50% of passengers using a local rail service are drawn for 1km of a station. The settlement footprint does not incorporate the station site and would include relatively few houses within this kind of distance.

13 New Settlements

- During the discussion period the Government will be looking to local authorities to put forward proposals for the creation of sustainable communities which demonstrate partnership with the development industry and have been the subject of discussion with local communities. A key consideration in selecting larger sites for new development is that they are well connected by public transport or have the potential to be well connected in phase with development taking place.
- In bringing forward proposals, certain locations should generally be avoided, in particular areas at risk of flooding or where there is a probability of landslips; areas which are subject to high levels of noise, for example from aircraft, motorways or trunk roads; or where development would lead to the erosion of significant natural heritage resources; or would see the loss of a significant area of prime quality agricultural land.
- The submissions should also focus on deliverability, indicating how the projects can be delivered through the planning system including possible identification in the National Planning Framework, and the role of strategic and local development plans and supplementary planning guidance. It is not intended that development should proceed through each of these levels of forward planning. The objective is to identify a critical path for expediting delivery which will ensure that environmental issues are addressed fully and there are opportunities for local communities to shape the location, scale and nature of development. The submissions should also indicate key constraints which need to be overcome such as land ownership, drainage capacity, and the presence of former mineral workings and/or contaminants.

In a report presented to the Highland Council Planning Committee on 19 March 2008, Committee was asked to “*consider seeking further clarification from Government as to whether there are any proposals contained within the A96 Corridor or indeed the wider Highlands which could be submitted as potential candidates for nationally important sustainable community projects*”, as part of the councils response to the draft NPF.

We wish to state at this point that if it is the intention to put forward the new town at Tornagraim in this category then there has been significant community opposition to the A96 Corridor proposals, and in particular the new town proposal.

A very important point is that the A96 Growth Corridor Framework (prepared in the form of a master plan, the intention to prepare the master plan was not signalled in the local plan) only exists to a point where it can be put forward to the NPF just **because of its passage through a few planning committee meetings**. Throughout the consideration of these A96 Corridor framework proposals by the Council committees, the public and elected members alike have been informed that, indeed ‘promised’ and reassured that, the order of procedures would be that this A96 Corridor master plan would be incorporated into the local plan process, a public local inquiry would take place and then the planning application for the new town in particular would be considered. We now understand that a planning application is expected in summer 2008. This planning application for the new town at Tornagraim will pre-empt the promised ‘proof of concept’ through the Local Plan and Public Local Inquiry (PLI)

Now we find ourselves in a situation where the Corridor Framework has, and is, being put forward by the council for significant inclusion in the NPF. Inclusion in the NPF will effectively make the public's role impossible. At no time was the public aware of the possibility that there would be such a significant material consideration in place by the time the Development Plan process started and the PLI held.

The public have had very little opportunity to effectively shape these proposals. The proposal is to build a new town on land owned by Moray Estates on a specific site to 'new urbanist' principles. Large numbers of meetings have been organised by the Landowner, including a 'charrette' process. The public's role at these meetings was never clearly defined, and now, we feel, rather unfairly could be used to show some kind of public involvement.

We also understand from the Council that that:

- *"The A96 Corridor Masterplan is a non-statutory planning document and is not subject to the detailed procedures of the development plan regulations".*

We are told that the proposed new town will be carbon neutral, but we are not convinced in this respect. It is to be sited on low lying land near to both an expanding airport and a major trunk road, which is against advice in the NPF itself.

14 Strategic Environmental Assessment (SEA)

APT notes that SEA is required by the Environmental Assessment (Scotland) Act 2005, and that it is a systematic method for considering the likely environmental effects of certain plans, programmes or strategies produced by public sector organisations. It aims to:

- Integrate environmental factors into policy and decision making;
- Improve policies, and enhance environmental protection;
- Increase public participation in decision making; and
- Facilitate openness and transparency of decision making.

We regret we are sadly unable to comment further due to time constraints.

15 Conclusion

Preparing this response to draft NPF 2 document has been extremely challenging, as outlined in section 4. Despite time constraints we estimate in excess of 100 hours has been spent by committee members either making contributions to this report or writing individual letters. This response reflects a range of perspectives regarding the factors that could produce sustainable economic growth and allow the Highlands to become an area that is wealthier and fairer, smarter and greener, healthier, safer and stronger; sections 7 through to and including 11 will reflect this on occasion.

However we are united in our concerns regarding the quality and extent of public involvement, engagement and participation, in both the NPF preparation itself and in those plans which are being put forward to the NPF by the Local Authority. We believe that the decisions taken on the A96 Corridor master plan reflect a very narrow range of interests.

We feel that there is a large question mark over the ability of the area to achieve the increase in population that the A96 Corridor Framework in particular requires.

Not only do the plans for our area, in our view, **lack vision and imagination**, but the focus (for the A96 Corridor in particular) seems to be on the desire for their implementation rather than on their deliverability. Despite spending tens of thousands of pounds on consultant's reports, the deliverability seems to hinge on large schemes for basic infrastructure provision such as water, sewage and road upgrades, which will be heavily reliant on public funding despite any developer contributions.

The major schemes are still very much 'developer led' and dominated by housing provision (despite 'mixed use' labels) at higher densities particularly in the East Inverness developments.

Despite the fact that some members of the public have spent a significant number of hours in consideration of the issues as presented in the NPF, many members of the public will still remain unaware of this document and its importance. Bearing in mind the comments we have provided in section 4, and the concerns and sensitivities around local issues such as the A96 Corridor Framework; there should be further opportunities for the public to have input prior to the consideration of the NPF 2 by The Scottish Government.

The Inverness Local Plan states:

"The future is lumpy, fuzzy and prone to the unexpected, but it helps if the community shares a vision of the place it aspires to become".

The future is a world of 'developers' and 'planning partners'; lumpy, fuzzy and prone to the unexpected it may be, but we should not, as we do, find ourselves excluded from sharing any vision for it.

Yours sincerely

(C Stafford)
Contribution from the APT Management Committee

NOTES:

1 The Glasgow/Edinburgh metropolitan region contains 63% of Scotland's population, generates 67% of national GDP and has contributed 80% of the growth in Scotland's GDP over the past 5 years. It ranks among the top 30 concentrations of economic activity in the world. (NPF)

2 In the publication "*Building Better Cities: Delivering Growth and Opportunities*" we note that according to the foreword the review was widened to address the strategic importance and future role of each city in 21st-century Scotland. However, the Interim Evaluation of the Cities Growth Fund: A Report to the Scottish Executive (Evaluates extent to which the City Visions have been implemented; assesses the economic impact that has resulted from CGF projects and the impact of these projects on the Executive's Cross Cutting Themes). With the exception of Dundee, funding is generally being spent across a wide range of projects many of which are little different to those that the authority and its partners would normally support. This also causes concern to some partners as they feel that impact may be very difficult to assess. Leverage is also not particularly good. As described earlier most CGF resources are being used to buy "more of the same" rather than to do something that will result in a dramatic change in the city's image. As such, most spend is not particularly "visionary" in terms of the last definition used in Paragraph 3.11.

3 The new European Structural Funds regime came into effect into January 2007, and whilst the amount of structural funding coming to Scotland has reduced substantially, the Highlands and Islands will still benefit from convergence funding, given the areas relative inaccessibility in the European Union. (Funding covers period to 2013).

4 The High Level Output Specification (HLOS) process

- A statement of the outputs Scottish Ministers wish to purchase from the rail industry during the next regulatory control period for track access charges.
- A responsibility created under the Railways Act 2005.
- Required to allow the Office of Rail Regulation to determine whether public sector funding is sufficient to allow Network Rail to deliver industry outputs.
- Ministers required to deliver Statement of Funds Available (SoFA) in parallel.

Responsibilities of Scottish Ministers

- Funding Network Rail through Network Grant.
- Franchising ScotRail.
- Funding major projects to enhance the railway.
- Determining available funds for rail industry.

Key timescales

- June 2006: Network Rail cost submission for Control Period 4.
- February 2007: ORR issues formal Access Charges Review notice to government funders.
- July 2007: Government submits HLOS and SOFA to ORR.
- October 2008: ORR issue Final Determination of Access Charges for CP4.

5 Report on the current state and threats to Scotland's soil resource September 25, 2006

Chapter 1 Introduction

1.1 Why are soils important for Scotland?

Soil is the natural and semi-natural material which forms the uppermost layer of the earth's crust, and covers the land surface. Its most widely recognised function is as the medium in which plants grow. Fertile soil therefore underpins food production for almost all societies. A former president of the United States, Franklin Delano Roosevelt, has said "The nation that destroys its soil destroys itself."

Chapter 2 Loss of soil organic matter

2.1 Summary

- Scotland's soils are relatively rich in soil organic matter, particularly in the hills and uplands but also in arable and grassland soils compared with some other parts of the UK. Scotland contains a much higher proportion of organic soils than the rest of the UK.
- Soil organic matter is a key property of soil and helps soils fulfil a large number of functions including mediating climatic conditions through carbon storage ([Chapter 3](#)).
- There is some evidence that losses of dissolved organic carbon in streams draining peaty soils have increased in the last two decades implying a possible increase in losses of organic matter from these soils.
- Soil organic matter is being lost through peat erosion and better information on peat erosion processes, how to monitor it, and if possible how to mitigate it are required ([Chapter 6](#)).
- Large decreases in organic carbon concentrations of soils in England and Wales, particularly in soils of greater initial organic carbon concentration, have been reported recently; this trend, if also occurring in Scotland, would have serious implications for Scottish soils as a carbon store and in the climate change debate ([Chapter 3](#)).
- Maintenance of soil organic matter in soils is a GAEC requirement within the Single Farm Payment

There is a clear separation between the highly organic soils throughout much of the Highlands and the Southern Uplands and those on the predominantly cultivated soils of the Central Valley and NE Scotland where much lower levels are present. Most of the cultivated land in Scotland has moderate or high levels (5-10%) of organic matter. High soil organic matter levels exist in the Highlands and Southern Uplands where the cooler and wetter climate conditions inhibit the decomposition of organic matter in plant material deposited on the soil surface. In such areas, the accumulation of organic matter is often more rapid than decomposition and an organic surface horizon forms. On level or gently sloping sites the total accumulation can be as much as 7-8 metres.

Chapter 3 Climate change

This chapter examines how Scottish soils might change in response to potential changes in our climate, some of the implications of those changes for soil functions and land management and on feedbacks through GHG emissions.

3.6 Conclusions

Given the uncertain nature of this threat, we cannot be clear about its scale or impact. Nevertheless we can make some judgements on potential changes to soil properties and whether soils might become more or less vulnerable to other threats. Climate change may:

- Change soil organic matter content, with a reduction more probable. Given the role that soil organic matter has on a number of soil functions, this is a key issue that affects the soil resource of Scotland and on our terrestrial carbon budget.
- Lead to a requirement for new soil management strategies on some soils. The risk of soil compaction on agricultural soils may increase and some soils might become more sensitive to these risks.
- Have a potential effect on biomass production through increased intensity and duration of soil drought.
- Increase the potential for soil erosion with possibly peaty soils most at risk and therefore increased loss of terrestrial carbon.

The pattern of soils and land use in the Scottish countryside is the result of soil forming factors interacting with social and human influences over a number of millennia. Scotland may be facing environmental change at a rate hitherto not experienced and this poses questions about how our land resource might respond. Is it resilient enough to adapt to these changes gradually or are there unforeseen responses that are too difficult to predict? Given this uncertainty, there is a case for adopting the precautionary principle and where possible, ensuring that our soils retain as wide a range of potential functions as possible. In addition and as importantly, climate change will affect the whole world and may result in quite dramatic climate shifts to the extent that food production in some areas may become seriously compromised. We need to view our soils in the widest possible perspective; our soils might be quite resilient but those in other parts of the world may not be.

Chapter 6 Soil Erosion

- Climate change models predict that Scotland will become warmer and wetter particularly during the winter months. If the incidence of extreme rainfall events increases, there are likely to be more frequent occurrences of erosion events, including erosion of bare cultivated soils, landslides and large scale peat erosion. **Hazard mapping offers a possible means of targeting protective measures.**

Chapter 8 Loss of soil to development and mineral extraction

This chapter discusses soil sealing through residential, industrial or transport development and mineral extraction, the scale of the issue in a national and regional context, the impact on soil by these developments and information on trends, scale and location of developments.

8.1 Summary

- Data on the loss of land and soil as a result of development is not collected in a consistent manner either at the national or regional level.

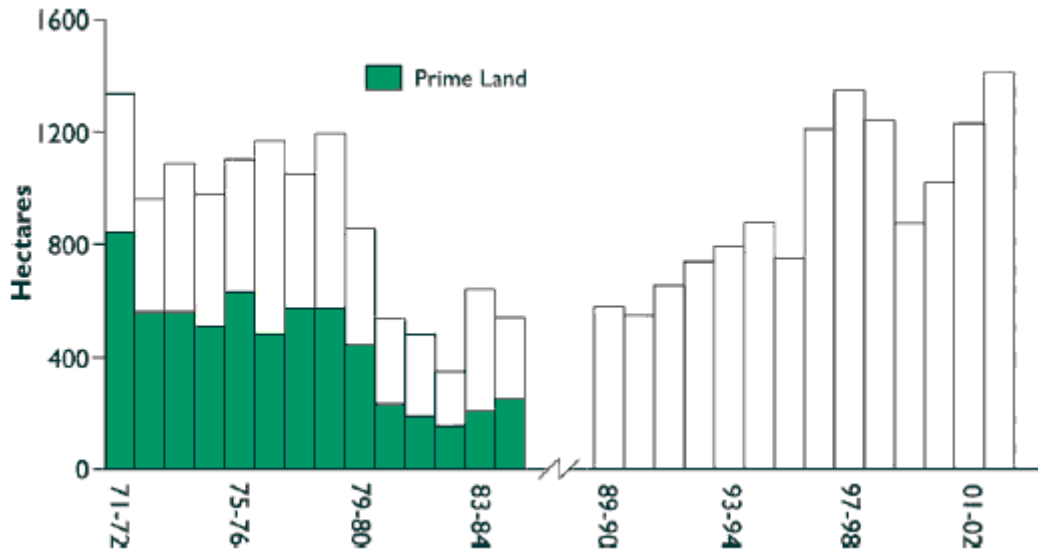
- Based on the limited information available, land appears to be being developed at a higher rate than at any time during the last 50 years; this raises questions about the sustainable use of resources and whether soil is being recognised and protected by the planning system.
- Soil lost to development is unable to fulfil any of its other functions; some such as biomass production is almost eliminated.
- There should be encouragement to re-use the soil that is removed during the construction phase.
- Based on previous data, a disproportionate area of our good quality and most flexible soils is lost to development; many of Scotland's settlements are located next to the best land within that area. As new developments tend to 'grow' from existing urban areas, this trend is likely to continue.
- Given the recent findings on reductions in soil organic matter levels (Chapter 2) and role that Scotland's organic soils have in Scotland's climate change programme (Chapter 3), **it is recommended that data on peat extraction be collected centrally by the Scottish Executive.**
- **It is recommended that mechanisms be set in place to capture data on land and soil loss to development. In addition to location and area, information on soil type and quality should also be recorded.**

8.4.3. Gaps in data / evidence

The data presented above are at the national level and although useful for indicating the scale of the issue at this level, it provides no indication of where it is occurring, the quality and type of soil that is being displaced and the range of functions that those soils were performing. This type of information is captured, but is less easily accessible than previously (M. Johnstone, pers. comm.). A request was made to SEERAD to obtain some of this more detailed information but on closer examination, the data were not in a form that was readily useable or interpretable.

Data on the quality of agricultural land that became developed were routinely captured and presented during the 1970s and 1980s (Davidson, 1992) approximately half was prime agricultural land (Figure 8.1). Prime agricultural land however represents only 7% of the total land area of Scotland. There was a marked decrease in new development during the first half of the 1980s (500-600 ha yr⁻¹) from that during the 1970s (1000-1,200 ha yr⁻¹). This trend has been reversed in recent years and rates of loss of land to development are now at the levels of the early 1970s. Figure 8.1 also demonstrates the reduction in quality of information with no indication on the type of land that is being lost.

Figure 8.1. Loss of prime agricultural land from 1971-1985 (Davidson 1992) and of loss of undifferentiated agricultural land in Scotland from 1989-2003 (Table 8.1).



A study was conducted for Angus Council to examine how their current and proposed Local Plans would address both Central and local government objectives of sustainable development, soil protection and of sustainable agricultural production (Project Management Scotland Ltd 2004). Land quality, based on the Land Capability for Agriculture classification, was determined for those areas identified for potential development with the Local Plans. In the current local plan (up to 2006), 37.4% of the total area allocated for built or irreversible development is prime agricultural land, whilst in the proposed local plan, this rises to 62.7%. The report concludes that local delivery of central government objectives is particularly difficult in areas such as Angus where most of the towns are surrounded by an agricultural hinterland of predominantly agricultural land. This tension is likely to be replicated throughout much of the eastern lowlands of Scotland and even in the west, where prime land is much scarcer because of climatic constraints; some development is likely to take place on the better soils. This study (Project Management Scotland Ltd 2004) provides a valuable contribution to the debate on land development vis-à-vis soil protection, but is flawed where it makes the assumption that land lost to development is proportional across all land classes; this assumption leads to a serious underestimate of prime land loss and an overestimate of losses of the poorer quality LCA classes.

In the absence of localised data that explicitly identifies the quality of land being developed, Fife was used as a trial area to test whether different ages of digital data could be used to identify and characterise land lost to development. It was based on the hypothesis that the area of built-up land indicated on the various datasets would increase in size through time. To test this, the 1:25,000 soil data (the mid 1960s), the 1: 25,000 scale LCA data (the early 1980s) and the 1:25,000 scale LCS88 data (MLURI 1988) were examined within a GIS. The experiment was only partly successful, in that the definition of built up land and the accuracy of their depiction on each dataset varied. It did not prove possible to determine the LCA class of much of the developed land, but there was a 31 km² (37.5%) increase in built up area between the oldest and most recent dataset and the soils that have been replaced could be identified. The LCA class and the overall functionality of these soils could be determined retrospectively, and although it is beyond the scope and timescale of this project, it is an option for future study.