

Agenda Item	6
Report No	CIA/36/21

HIGHLAND COUNCIL

Committee: City of Inverness Area Committee

Date: 18 November 2021

Report Title: Inner Moray Firth Proposed Local Development Plan 2

Report By: Executive Chief Officer Infrastructure, Environment & Economy

1 Purpose/Executive Summary

1.1 This report sets out for approval the key elements of the second Inner Moray Firth Proposed Local Development Plan that relate to the area covered by this Committee. The relevant content, which is outlined in **Appendices 1 and 2** takes account of responses received during a consultation on a Main Issues Report for the plan undertaken from January to April this year. Members are asked to give approval to these elements of the plan to allow officers to create the Proposed Plan which will be published for public consultation in early 2022, with feedback from the consultation to be reported back to this Committee to help finalise the plan for adoption.

2 Recommendations

Members are asked to:

2.1

- i. note the issues raised by respondents to the consultation on Local/City committee-specific matters and agree the recommended responses to these issues both as detailed in **Appendix 1**;
- ii. note the issues raised by respondents to the consultation on strategic matters and officer recommended responses both as detailed in **Appendix 2** and recommend to the Economy and Infrastructure Committee and the Local/City committee's view on these strategic matters;
- iii. note that additional supporting documents will accompany the publication of the Proposed Plan, including those outlined in section 3 below;
- iv. note that minor presentational, typographical and other factual updates and changes will be made by officers, with any material changes to be agreed in consultation and agreement with the chair of the relevant committee(s) prior to publication;
- v. in line with government guidance, to agree for the published Inner Moray Firth Proposed Local Development Plan to be treated as a material planning consideration in making planning decisions and providing advice; and
- vi. agree the approach to consultation outlined in section 7 of this report.

3 Implications

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

4 Context

- 4.1 A Local Development Plan provides the land use planning framework for planning advice and decisions, but it also helps the Council, partners and communities to support changes and improvements across Highland and to achieve local and national outcomes. The second Inner Moray Firth Local Development Plan (LDP) (in the rest of this report simply referred to as the 'Plan') will become the principal, local, land use policy document in determining planning applications and other development investment decisions in the Inner Moray Firth area. The Plan area comprises the eastern part of Ross and Cromarty, Inverness-shire, Nairnshire plus a small, mainly unpopulated, part of Badenoch and Strathspey. It stretches from Garve in the west to Tain in the north and from Auldearn in the east to Tomatin and Fort Augustus in the south. At the end of the review process the Plan will replace the existing Inner Moray Firth LDP and will sit alongside the Highland-wide LDP and other planning guidance in providing a comprehensive suite of planning policy for the Plan area.
- 4.2 Any proposed development plan when published must represent a council's collective, 'settled view' on its choice of policies and development sites and the wider strategy for the area. Therefore, this is one of a series of reports to the six Local/City Committees that span the Inner Moray Firth Plan area seeking approval of the issues relevant to these areas. This will be followed by a final overarching report to the strategic committee to seek approval for a number of strategic elements of the Plan such as a vision, spatial strategy, outcomes and wider policy issues for the whole Inner Moray Firth area. These matters will be reported to the strategic committee for consideration and approval although Local/City Committees are asked to contribute any relevant views on these matters.

It should be noted that the Council's Indicative Regional Spatial Strategy approved by Members (as part of our contribution to Scottish Government's emerging National Planning Framework 4) has significantly shaped the preparation, strategy and the outcomes to which it needs to contribute for people and communities in the area.

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

5 Main Issues Report Comments

- 5.1 Following a consultation on the Main Issues Report (MIR) held between January and April 2021 officers have carefully considered all of the comments received. The full version of all comments received has been available on the Council's website since early June 2021. Members covering the IMF area were alerted to those comments at that time and can access them again in preparation for this committee via [this link](#). The issues raised in those comments are summarised in **Appendix 1 for settlement specific matters and in Appendix 2 for more strategic issues** together with a recommended response where it is relevant to the Plan's proposed content.
- 5.2 Over 1,400 comments have been received from 432 respondents which is a record total for any version of a Highland development plan, reflecting positively on the publicity undertaken and the online format for making comments. To ensure awareness of the consultation and the process for responding publicity included:-
- a postcard mailshot to every household in the IMF area;
 - social media publicity;
 - an 'on request' hard copy alternative for reading and commenting on the MIR;
 - online videos to explain the Plan and how to comment; and
 - responses being accepted by email and conventional letter for those unable to access or use the online method.

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

6 The Proposed Plan

- 6.1 The Proposed Plan's substantive content relevant to this committee area is set out in the appendices to this report. **Appendix 1** details and justifies (taking account of comments received) the recommended development site choices, greenspace safeguards and Placemaking Priorities in the area. **Appendix 2** details and justifies (taking account of comments received) the recommended strategic content including the Plan's Outcomes, General Policies and Spatial Strategy (including the total housing land requirements and Hinterland boundary).

- 6.2 *Vision & Outcomes* – a reordering of the Plan’s outcomes is suggested in **Appendix 2** to better emphasise the Plan’s lead aims of addressing the climate change and ecological emergencies whilst also enabling post pandemic economic recovery.
- 6.3 *Settlement Hierarchy* – the hierarchy is recommended as tabulated in **Appendix 2** with the suggested reclassification of Cawdor, Contin and Inchmore as ‘Growing’ rather than ‘Main’ Settlements. This means a lower level of expected growth within these villages than that envisaged in the approved development plan to reflect their constraints.
- 6.4 *Housing Land Requirements* - a minimum target of around 8,500 homes over a 10-year period are proposed with roughly 6,000 of these expected to be built on sites allocated in the Plan. The Plan seeks to increase the proportion of these that will be built in environmentally sustainable and economically viable locations and that will be affordable, self-built and/or adapted for the ageing population. The table in **Appendix 2** breaks this target down by Housing Market Area. These figures are derived from base figures produced within a Highland-wide Housing Need and Demand Assessment (HNDA), which will be a supporting document accompanying the Plan’s publication. At the time of writing, the HNDA approval process is moving towards completion with the final figures expected to be reported to the Economy and Infrastructure Committee in December 2021. A few wholly new housing development sites have been suggested in response to the Main Issues Report. These should have been made at the Plan’s Call for Sites stage and therefore have not been considered in any detail in this report and its appendices. There is no exceptional justification for the inclusion of any of them particularly since they haven’t been subject to public comment and environmental assessment. The site allocations in the Plan are considered to have sufficient flexibility to accommodate the minimum identified Housing Land Requirement based on the current national guidance. The Housing Market Partnership, which is a group of senior planning and housing officers, has overseen the HNDA process and inputted policy-based adjustments to the requirement totals to put forward a comprehensive case that all justifiable housing need and demand is included in those totals, working within this national guidance. Further work is being carried out to assess housing need for economic growth.

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

- 6.5 *Spatial Strategy* – the Map in **Appendix 2** is a visual expression of the broad spatial priorities, settlement hierarchy and infrastructure projects for the Plan area. This strategy should assist in promoting a more coordinated approach in matching new development to infrastructure and community facility investment both corporately across the Council and with external stakeholders.

- 6.6 *Hinterland Boundary* – no change is recommended except a minor expansion at Belivat Nairnshire. The Main Issues Report included an option to contract the Housing in the Countryside boundary in Easter Ross. However, the majority of comments received on the Main Issues Report support the status quo in respect of this issue. Any contraction of the boundary would run contrary to the Council’s aspiration to reduce unnecessary and unsustainable travel choices. It is also noted that the Rural Housing Supplementary Guidance has been amended to allow further opportunities for housing in the countryside and support the rural economy.
- 6.7 *General Policies* – several new or updated (relative to those contained within the Highland wide Local Development Plan (HwLDP)) General Policies are being proposed for the Plan area. These are detailed in **Appendix 2** with a brief summary of comments received on these topics and a justification for the proposed approach. These have been influenced by the Council’s input to National Planning Framework 4 and its likely content. The policies give new or greater emphasis to climate change, placemaking, greenspace, sustainable travel, increasing affordable/ageing population/self-build housing, biodiversity, and town centre recovery. These new/amended policies will update (not supersede) those in the HwLDP but will be given primacy by the Council in the application of these policies when the Plan is adopted.
- 6.8 Settlement-Specific Matters
- Our proposed approach to these strategic matters has influenced our place-based recommendations; i.e., our Placemaking Priorities and development site choices.
- 6.9 This place-based content within the committee’s area is set out in **Appendix 1** and is summarised in the following paragraphs.
- 6.10 In Ardersier, the recommendation is to allocate the land south of Nairn Road as the site has permission for 117 homes and is currently being built out. The other site to be allocated is at Station Road which benefits from being centrally located and brownfield. Land previously allocated for an expansion to the industrial estate is not being carried forward due to availability issues. The main developable areas at the existing Milton of Connage site have since been used for agricultural purposes. The two sites to the north of the village are not being taken forward as they are both at risk of flooding.
- 6.11 In Beauly, the recommended to be retained sites will maintain the compact settlement pattern of Beauly and respects its constraints. A new primary school is supported in a central location. Business development is directed as close as possible to the town centre and passing trade to bolster footfall. The allotments at Fraser Street provide a community growing space but this could be provided elsewhere in Beauly. At least part of the allotments site, being flat and central to amenities, could be suited to housing accommodation specifically adapted for the elderly whether that is private flatted or institutional accommodation. New mainstream housing development is directed to more peripheral areas because of the limited capacity of Croyard Road and farm tenancy issues on land adjoining.
- 6.12 In Croy, the focus of development should be on the land south of the primary school as the part of the site adjoining the B9006 has permission for 100 homes and is currently half complete. The north western part of the site (CR02) is also proposed to be allocated as it forms ‘phase 2’ of the original proposal and a certain level of infrastructure was installed to accommodate it. The opportunity to enhance green networks for active travel use and biodiversity is also noted as a priority.

- 6.13 In Dores, the recommendation is for the site south of the church to be allocated for a mix of housing, business/tourism and community uses as it's centrally located, has active developer interest and could include an expansion to the cemetery. Land to the south of the village hall should also be allocated for housing as development can enable creation of a better access to the hall. Land north of Mill Croft is not recommended due to potential adverse visual impact and lack of quantitative need. The land north of the playing field is not supported as no specific community proposals exist for the land. Land put forward east of the B862 and south of the village is not considered suitable for housing development due to its detached location, potential wider visual impact and it being a steep wooded site.
- 6.14 In Drumnadrochit, 'legacy' allocations at Drum Farm and adjoining the new 'Co-op' store should be completed but no new expansion areas should be promoted. Land to the rear of the post office will be better protected from flooding following completion of the programmed flood scheme and is also in an optimum central location close to other commercial facilities and the principal public car park. Other than these sites, expansion of shinty facilities would most sensibly be made adjoining the existing pitch and underutilised land closer to the high and primary schools may have potential for complementary education or other community use.
- 6.15 Similarly, in Fort Augustus, consolidation rather than expansion is proposed. A widely drawn Settlement Development Area will support smaller infill development sites rather than larger allocations. Land south of the Old Convent is already part developed and could be extended. Land within and adjoining the village car park is in the most sustainable location and could be reconfigured to allow even more and better laid out car parking plus enabling mixed use development. Woodland issues with this site will be addressed via developer requirements text.
- 6.16 In Inverness City future development should focus on completing the already allocated major expansion areas. Large sites are actively delivering housing in the west and east of the City that will meet the needs of the area beyond the lifetime of the Plan. Major infrastructure investment is committed or identified to support growth in these locations. A major focus remains on the recovery and regeneration of the City centre, with key projects and sites identified to achieve an ambitious vision for the Highland Capital.
- 6.17 For West Inverness, completion of development sites at Westercraigs and delivery of housing on land to the east of Stornoway Drive will provide new neighbourhoods. The emerging Charleston Academy redevelopment, coupled with the continued delivery of Torvean Gateway and mix of uses identified around Torvean Quarry, will ensure a sustainable mix of uses for the district. Regeneration of Muirtown Basin into a vibrant mixed-use area will attract locals and visitors. These neighbourhoods will be connected by a high-quality network of green and open space that will be appropriately safeguarded from development.
- 6.18 For South Inverness completion of long-established developments in Milton of Leys, Ness Castle and Slackbuie will be supported by capacity improvements at Milton of Leys Primary School and a new Primary School at Ness Castle. Ness-side will deliver a major new City neighbourhood, served by the new West Link transport infrastructure. It is recommended that a balance be struck between community aspiration for community food growing with the need for City housing - Knocknagael Farm is identified for mixed use to support this approach. Together these developments will be supported by high quality, connected green infrastructure, including safeguarded strategic open space at Fairways.

- 6.19 For Central Inverness a focus remains on essential regeneration and recovery. This is proposed to be realised through the Placemaking Priorities and allocations that support emerging projects, including the Inverness Rail Station Masterplan, City Centre Recovery Masterplan, and the proposed reconnecting of the City to its waterfront assets, including at Inverness Harbour. Major potential employment land is identified around the Longman former landfill and Caledonian Stadium car parks, supported by major improvements at Longman roundabout. The green and blue networks in Central Inverness are safeguarded, and potential for their expansion is supported in principle.
- 6.20 For East Inverness ongoing City expansion at Stratton and Ashton Farms continues to be supported and carefully guided by carrying forward the Inverness East Development Brief. Transport infrastructure is key to this major expansion, which is being delivered through Transport Scotland's A9/A96 Inshes to Smithton (East Link) project and A96 dualling project. The need for additional education, community and healthcare provision is recognised through a suite of allocations to safeguard land for a new health facility at Stratton, as well as primary and secondary provision, including Culloden Academy upgrades and land safeguards for two new primary schools and a High School at Stratton and Ashton Farms. Continued monitoring of school capacities, coupled with cross-service working to make a business case for capital funding to deliver new schools, will be required during the lifetime of the Plan. Green networks will be identified alongside new district park facilities to be delivered in combination with housing, employment and other uses.
- 6.21 In Kiltarlity, development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school and sewage works can accommodate this limited expansion. Land at Glebe Farm is part developed, part serviced and close to the local primary school. There are other alternative development sites in close proximity to Kiltarlity's facilities, but these would open up much larger development opportunities for which there is neither quantitative need nor servicing capacity. The Old Mill is a brownfield redevelopment opportunity that could provide local employment opportunities. Additional lair capacity is likely to be needed at the parish burial ground within the Plan period, so a proportionate (reduced) expansion area is safeguarded.
- 6.22 Similarly, in Kirkhill, future development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school, with a small extension, and sewage works can accommodate this limited expansion. Land at Groam Farm is permitted, close to the local primary school and is already part serviced. The builder's yard is central to the community, has been underutilised for several years and would therefore benefit from redevelopment. Other expansion options are not required in quantitative terms and/or suffer from greater constraints. A single house at Clunes may be acceptable but should be pursued as a housing in the countryside proposal.
- 6.23 In Tomatin, opportunities for housing development are identified west of the church where there is an application currently pending for affordable homes. This land was gifted as a means of offsetting affordable housing contributions on land elsewhere, and the optimum site for this would be land north of the railway viaduct as it is relevantly close to facilities and active travel connections are achievable. Pluvial flood risk will be an important consideration for identifying the developable area. It is recommended that land is allocated for the distillery expansion and the redevelopment of the former Little Chef to take advantage of passing trade from the A9. The former train station is identified for business and industrial use although, at present, Network Rail and Transport Scotland are unlikely to support reinstatement of the rail halt.

- 6.24 As Tornagrain new town forms part of the strategic and long-term vision for future growth of the Plan area, it is recommended for retention. This is consistent with the consented masterplan, which includes almost 5,000 new homes and a range of other facilities. Placemaking Priorities have been added to ensure appropriate phasing of infrastructure and to promote the creation of multi-use green networks.
- 6.25 It is proposed that the 'Growing Settlements' that are located within the Committee's area be Abriachan, Balnain, Cannich, Farr/Inverarnie, Foyers, Gorthleck, Inchmore, Tomich and Whitebridge. Placemaking Priorities will be used to guide decisions on development proposals alongside the criteria set out within the general policy. These Priorities have been augmented to reflect issues raised by most respondents. For example, NatureScot sought changes to better protect and enhance local greenspaces and green networks as conduits for the movement of people, wildlife and flood waters. Landowners at Inchmore oppose its reclassification as a Growing Settlement but provide insufficient convincing evidence that their development proposals are effective and appropriate. Local groups sought additional Plan references to enhanced active travel and public transport connectivity. Community group requests for additional Plan references at Inverarnie, Farr, Foyers, Gorthleck and Whitebridge are all recommended for inclusion.
- 6.26 Four Economic Development Areas (EDAs) lie within the Committee's area. Land at Castle Stuart should be re-allocated for business, leisure and tourism uses consistent with the extant permission for a second golf course and associated facilities. It is proposed to reallocate Inverness Airport Business Park for Business and Industrial uses as the infrastructure is in place to accommodate significant commercial development. Alongside this, Council owned land at Dalcross Industrial Estate is proposed for its expansion. Although no mechanism for its delivery exists at present, it could if developed help address the local shortage of industrial space and address localised flooding issues. Whilst the current expected departure date of the armed forces from Fort George is 2032, it is recommended as a mixed-use EDA to promote its availability and ensure a suitable future use is secured. Whiteness is recommended for industrial use only. New owners have confirmed their intentions for the site to be an energy industry hub. To highlight the important of Whiteness, along with other key ports in the Inner Moray Firth area, for the renewables industry, it is shown within a Strategic Renewables Energy Zone in the Plan's revised Spatial Strategy Map.

7 Proposed Consultation Arrangements

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

8 Next Steps

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

Designation: Executive Chief Officer Infrastructure, Environment & Economy

Date: 28 October 2021

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Background Papers:

1. Inner Moray Firth LDP: Main Issues Report: January 2021;
2. Comments Received on Main Issues Report: January to April 2021;
3. Inner Moray Firth LDP: Strategic Environmental Assessment: draft Revised Environmental Report: November 2021;
4. Inner Moray Firth LDP: draft Revised Transport Appraisal: November 2021; and
5. Inner Moray Firth LDP: draft Revised Equalities Impact Assessment: November 2021

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

APPENDIX 1: CITY OF INVERNESS AREA COMMITTEE: SETTLEMENTS

MAIN SETTLEMENTS: ARDERSIER



Summary of Issues Raised in Comments (2 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> NatureScot support the plan to improve transport connections including for non-motorised users and want to see opportunities to tackle biodiversity loss and climate change for the renovation and redevelopment of vacant and derelict land. Respondent agrees with Placemaking Priority for better active travel links with Inverness. 	<p>The recommended response is to follow the MIR preferences. This includes the allocation of the land south of Nairn Road as the site has permission for 117 homes and is currently being built out. The other site to be allocated is at Station Road which benefits from being centrally located and brownfield. Land previously allocated for an expansion to the industrial estate is not being carried forward due to availability issues. The main developable areas at the existing Milton on Connage site have since been used for agricultural proposes. The two sites to the north of the village are not being taken forward as they are both at risk of flooding.</p>

Placemaking Priorities

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

Greenspaces Map

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



Recommended Development Sites

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

BEAULY



Summary of Issues Raised in Comments (16 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • Support for removal of BE07 & BE08. • Request for Council to fund key Active Travel (AT) routes and use CPO powers especially Beauly-Lovat Bridge & Dunballoch-Cabrach sections and Muir of Ord to Conon Bridge. • Safeguard shinty pitch and amenity of BE06 • Landowners supports allocation of BE01 for Housing, BE02 for Business & Housing and BE08(S) but won't release BE04, BE07 & BE08(N) for agricultural tenancy reasons. • Beauly Community Council want BE04 & BE05 deleted and Care Home use on BE01-3. Request greater control on development towards Muir of Ord. • NatureScot suggest green networks along burns and loop road. • Network Rail won't fund rail halt expansion. • Objection to BE04 because: better alternative sites for these uses; breach of natural settlement boundary; and, loss of amenity. 	<ul style="list-style-type: none"> • The recommended to be confirmed sites will maintain the compact settlement pattern of Beauly and respects its constraints. Other things being equal, compact mixed use development will encourage active travel because there will be the opportunity to walk or cycle to local employment and local facilities. A new primary school is supported in a central location. Business development is directed as close as possible to the town centre and passing trade to bolster footfall. The allotments at Fraser Street provide a community growing space but this could be provided elsewhere in Beauly. At least part of the allotments site, being flat and central to amenities, could be suited to housing accommodation specifically adapted for the elderly whether that is private flatted or institutional accommodation. New mainstream housing development is directed to more peripheral areas because of the limited capacity of Croyard Road and farm tenancy issues on land adjoining. • Strategic AT links will be given greater support within other sections of the Proposed Plan. • Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.

Placemaking Priorities

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

Recommended Development Sites

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

Greenspaces Map

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



CROY



Summary of Issues Raised in Comments (3 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • Croy and Culloden Moor Community Council seek clarification on: 1) figure of 10% population increase in 10 years as they believe it is higher; 2) Scotia homes meeting housing needs for foreseeable future. Also the noted transport concerns were highlighted to Council prior to Scotia development. • NatureScot highlight opportunities to create new green networks and connect with the nearby Ancient Inventory Woodland which could provide active travel measures including along the Croy Road to Tornagrain. • Landowner objects to deallocation of CR03 due to: upfront onsite infrastructure investment associated with development of CR01; phasing was to ensure market demand; the site is effective; landowner opted for Scotia to ensure a better quality end product; both phased masterplanned including site wide design strategy; increased access to facilities (new shop and Tornagrain) and potential for other commercial uses; and, less need to travel to work and enhanced connections (e.g. Dalcross Rail). 	<ul style="list-style-type: none"> • The population change figure in the MIR was based on the latest mid-year estimate (2017) against the 2011 census figure. The figure is likely to have increased since then as more housing development is complete. • An additional Placemaking Priority will be included to promote multi-use green networks, particularly the connection of woodland with active travel provision including Croy Road to Tornagrain. • CR01 will continue to be allocated as it is under construction. Given that CR01 was designed as Phase 1 and a level of infrastructure was provided to accommodate further development, we propose to allocate CR03 for a maximum of 50 units. Opportunity exists to create a local enterprise/co-working unit within CR03 to allow residents to work closer to home.

Placemaking Priorities

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

Greenspaces Map

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



Recommended Development Sites

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

DORES



Summary of Issues Raised in Comments (4 comments)	Recommendations & Reasons
<p>Dores and Essich Community Council (DECC):</p> <ul style="list-style-type: none"> • Support DO01 as it is effective within the short term. DECC object to DO02 as it is considered ribbon development and have concerns over its availability. • Request that DO03 and DO05 are merged and allocated for housing and community woodland due to Scottish Water commitment to upgrade water supply, willing landowner and community support. Both sites are required to ensure viability. Indicative site layout submitted in support. • Support retention of the Community allocation DO04 but recognise no specific proposals at present. • Request a new site to the west of the B862 be allocated for employment uses south of the Saw Mill as there are no other available sites in Dore. • Raise no objection to Dore becoming a Growing Settlement but wish to remain informed of decision. <ul style="list-style-type: none"> • NatureScot support recommendation not to allocate DO03 and DO05 due to protected woodland on the site. Recommend a developer requirement be applied to DO04 in relation to the GCR designation. • Landowner of DO03 and DO05 supports allocation as a single housing site because: the housing projections in the MIR are too low; it will satisfy affordable and self build demand; the sites are effective taken as a whole noting that the Scottish Water will require part of the southern site; developer interest in the form of an affordable housing provider; associated with improved access to the village hall; Dore is a highly sustainable location; the allocation will avoid ad-hoc and unplanned housing in the countryside; and, compensatory planting will take place on other land in the same ownership. 	<ul style="list-style-type: none"> • Retain DO01 and DO03 development sites (see detail in table below) because both have developer interest (affordable housing providers) and can deliver wider benefits for the community. DO01 is centrally located and is a logical expansion site. DO03 is associated with Scottish Water infrastructure upgrade works and an access upgrade to the village hall. However, being a wooded site with topographical constraints and slightly more detached from the settlement, there are deliverability concerns. • Do not take the following sites forward: <ul style="list-style-type: none"> DO02 – due to potential visual impact and better alternative sites. DO04 – No specific proposals for development and potential visual impact. DO05 – Detached from settlement, suggested active travel connections not practical, steep wooded site which could have a wider visual impact.

Placemaking Priorities

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

Greenspaces Map

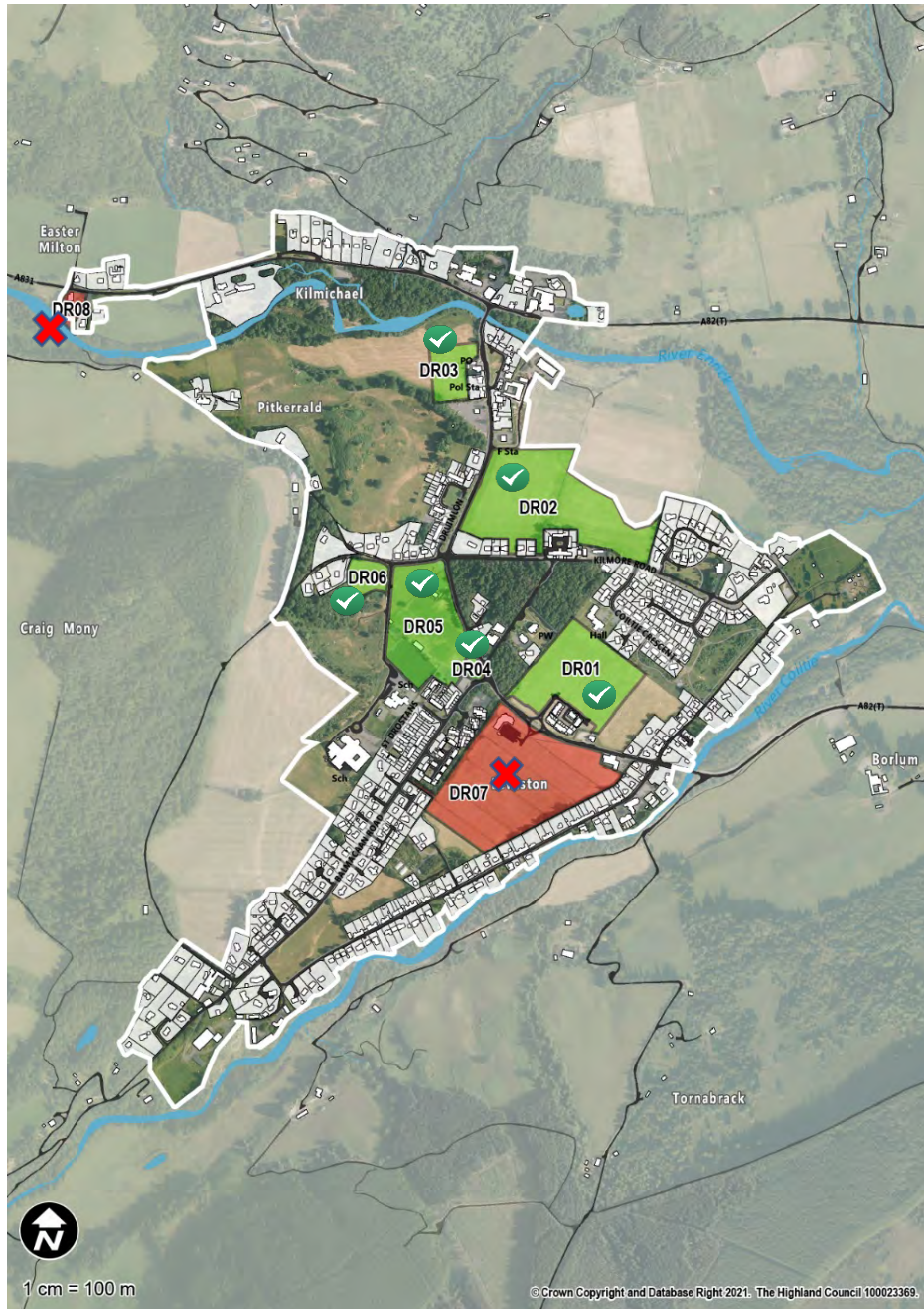
We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

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

DRUMNADROCHIT



Summary of Issues Raised in Comments (19 comments)

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

Recommendations & Reasons

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

Placemaking Priorities

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

Recommended Development Sites

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

Greenspaces Map

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



FORT AUGUSTUS



Summary of Issues Raised in Comments (3 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • Fort Augustus and Glenmoriston Community Council supports small scale c. 10 units private/affordable housing developments – suggests need for campervan parking area with waste disposal facilities. • Owner supports FA02 for tourism development and visitor management facilities. • NatureScot requests better Green Network (GN) referencing and woodland safeguard for trees on FA02. 	<ul style="list-style-type: none"> • Consolidate rather than seek to promote expansion of Fort Augustus – i.e. a widely drawn Settlement Development Area that will support smaller infill development sites. The fragmented pattern of landownership within the village and other constraints limit the land that is available and viable for significant development. Land south of the Old Convent is already part developed and could be extended. Land within and adjoining the village car park is in the most sustainable location and could be reconfigured to allow more and better laid out car parking plus enabling mixed use development. • Addition of a developer requirement to site FA02 to ensure that development fits around retained semi natural origin woodland. • Placemaking priority references to need to safeguard and enhance Green Networks and internal active travel network connectivity.

Placemaking Priorities

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

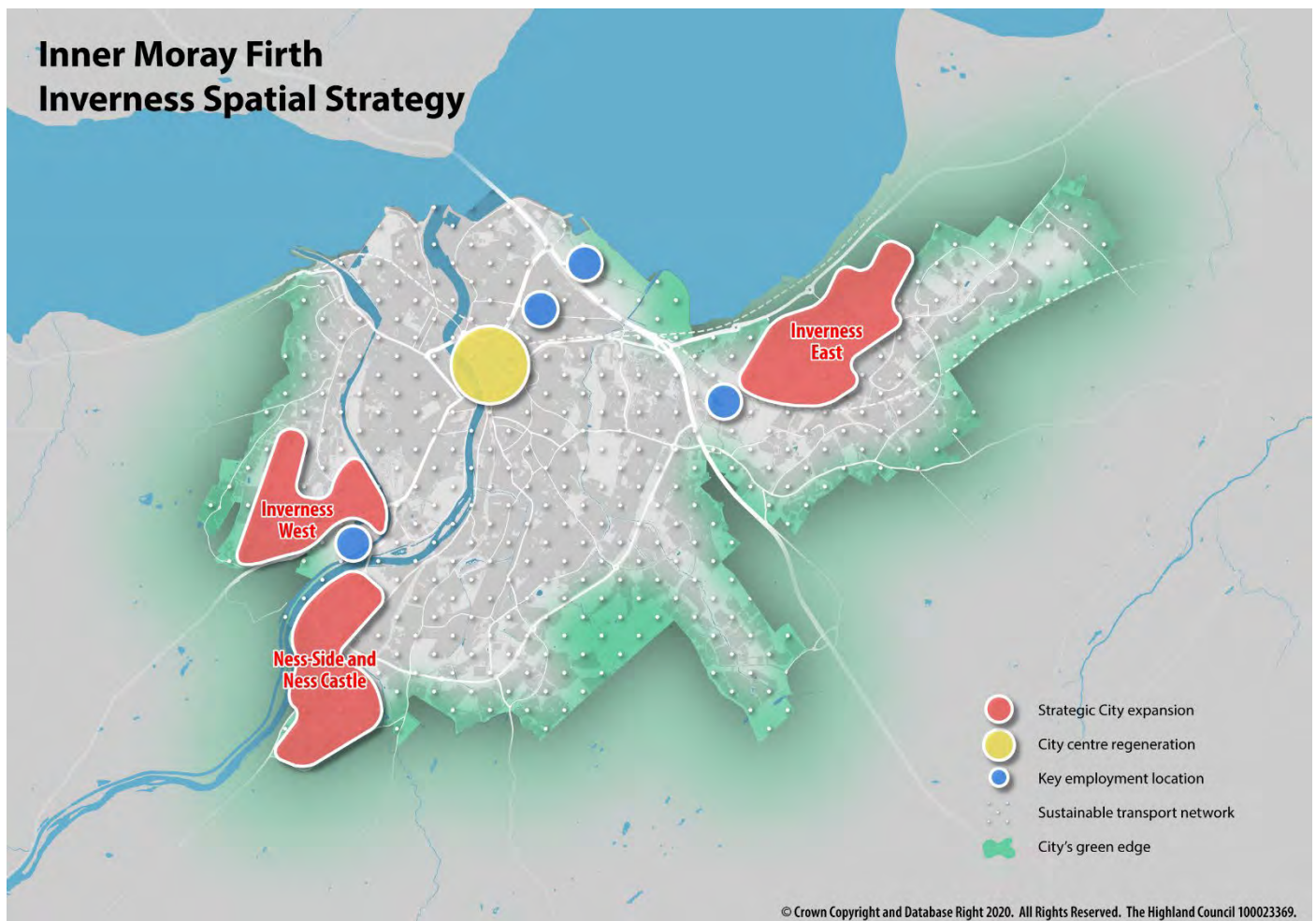
Greenspaces Map

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



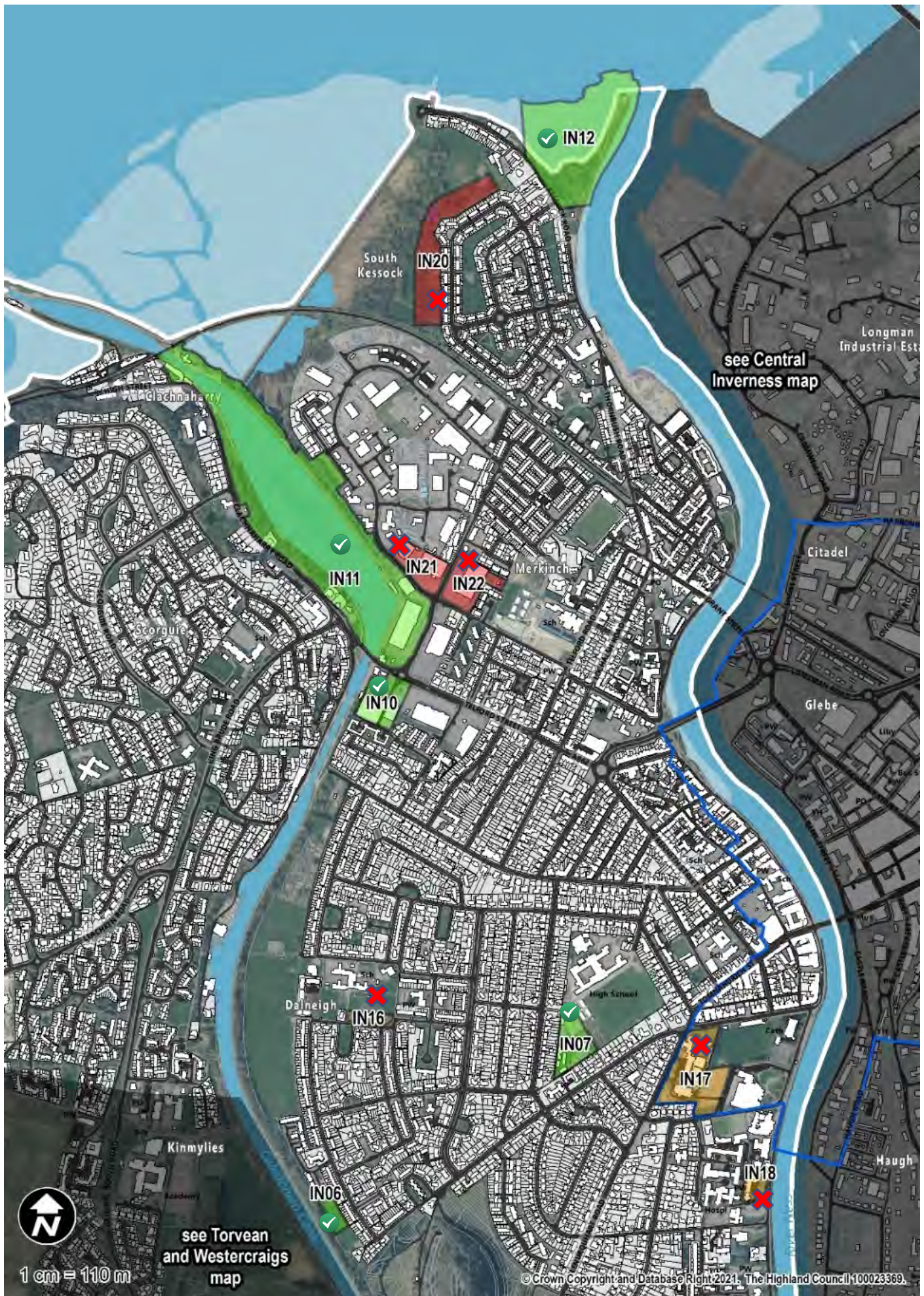
Recommended Development Sites

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



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

WEST INVERNESS





Summary of Issues Raised in Comments (20 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • NatureScot request plan provides opportunities to enhance green infrastructure to help promote active travel and safeguard the setting of Inverness. • Lochardil and Drummond CC request active travel networks around Caledonian Canal and Torvean Quarry. • Ballifeary CC note that large-scale events generate traffic and noise issues at Bught Park and Northern Meeting Park. • Ballifeary CC request new community facilities, Northern Meeting Park and Bught Park may provide opportunities. • Ballifeary CC request following green areas are protected from development: River Ness and Ness Islands; areas around Rugby Pitches, Holm Bridge and Caledonian Canal/Tomnahurich Bridge; Bught Park/Ballifeary area; Whin Park; Tomnahurich Cemetery; new park at Torvean Gateway; Playing fields for local primary schools and Canal towpaths. Note that some of these areas have potential for community growing, improved recreation facilities and management to encourage biodiversity and wildlife. • Ballifeary CC request traffic management plan for area due to high traffic levels and parking on residential streets; improved public transport; active travel hub in or near the Northern Meeting Park; Infirmary Bridge kept open; better street lighting; pedestrian crossing on Bught side old swing bridge and improved provision for tourist coaches. • Ballifeary CC concerned due to volume of holiday lets in area and wish for flats around Bught to be regenerated. • Request for future development in Inverness West to be lower density; incorporate greater range of services and open space; encourage wildlife and incorporate effective insulation and renewable energy sources. • Support for improvements to digital connections and schooling as these are vital services. <p>DALNEIGH, BALLIFEARY, MERKINCH AND SOUTH KESSOCK</p> <ul style="list-style-type: none"> • Objection to IN6 as wishes site to be allocated for greenspace and used for allotments. • No comments were received on IN7 during consultation period. However, the Council's Education Service have since advised the site is required for the operational needs of the school and potentially further education provision. • Landowner support for IN12 as proposal would complement nearby attractions and future development and provide economic and social benefits. NatureScot and RSBP suggest careful 	<ul style="list-style-type: none"> • The plan will show existing and opportunities for green infrastructure and a reference added to the West Inverness place making priorities. • Improved active travel networks will be specified as a developer requirement for Torvean Quarry; the Torvean and Ness-side Development Brief identifies a number of active travel networks around the Caledonian Canal, further opportunities within the scope of the plan will be explored. • Noise and traffic disruption during large-scale events at existing venues would usually be considered during the planning stages for an event and not in a development plan. • There a number of new, existing and planned community facilities in the Ballifeary area, existing buildings and outdoor spaces at the Northern Meeting Park and Bught Park may provide opportunities. • The plan will identify numerous greenspaces and green networks that will have protection from development including many of those requested by Ballifeary CC. • A Transport Appraisal has been undertaken to inform the plan. It has a focus on developing a sustainable transport network. Any new development proposed will be required to prepare an appropriate level of transport study to accompany a planning application; this will help ensure existing transport issues are not exacerbated by new development. • The Scottish Government have published legislation on introducing control areas to manage high concentrations of secondary letting in areas where it can affect the availability of residential housing. The Council are aware of the pressures in some areas of Highland and are considering options for a framework on policy on control areas. • New mixed use development may act as a catalyst for regeneration of the wider Bught area. • The range of development opportunities in West Inverness provide a variety of densities and incorporate a number of mixed use sites, protected open space and green networks. • The Plan will continue to support improvements to digital connections and improved education facilities and increased capacity where required. <p>DALNEIGH, BALLIFEARY, MERKINCH AND SOUTH KESSOCK</p> <ul style="list-style-type: none"> • Preferred MIR sites IN6, IN10, IN11 and IN12 continue to be supported in the plan. Developer requirements will include mitigation to prevent adverse impacts on nature interests. Whilst IN6 is currently green space there is an opportunity for a large open space close by to the north be upgraded to compensate for the loss of open space at IN6. These sites represent opportunities for

mitigation required to prevent adverse impacts on nature interests.

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

TORVEAN AND WESTERCRAIGS

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

development consistent with the uses set out in the MIR.

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

TORVEAN AND WESTERCRAIGS

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

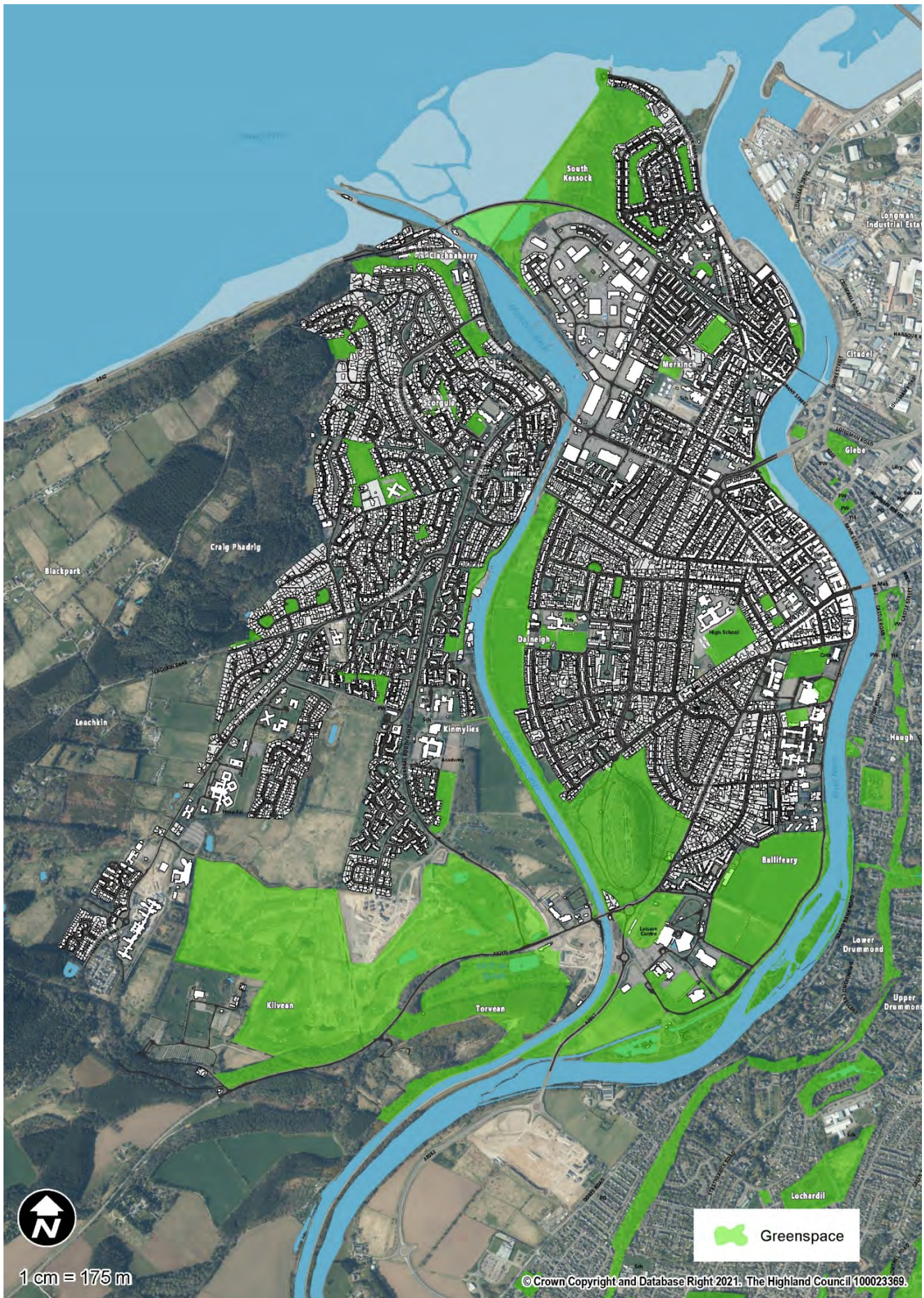
<ul style="list-style-type: none"> • Object to reduction of settlement boundary on the western edge of the city (adjacent to Westercraigs and encompassing Dunain Woods) because: forms an established and successful existing edge to this part of the City; sets a clear emphasis that area is an asset; enhances potential for limited development and general policies are sufficient to allow only appropriate development. • Request new allocation for tourism/leisure use (community woodland with appropriate pockets of tourism / leisure development) on hill on land around Dunain Woods as would increase range of holiday accommodation in attractive locations in Inverness area; is close to public transport links; would provide contribution to upgrades to woodlands and this part of Great Glen Way; integrate with community woodland; establish area as a destination for local communities and visitors. 	<ul style="list-style-type: none"> • The uses supported at IN14 are consistent with the Torvean and Ness-side Development Brief and continue to be considered appropriate in this location. The wider area provides a significant amount of green space. Detailed design advice to ensure high quality development is also set out in the development brief. • IN19 was presented as an alternative option in the MIR will not be allocated for development. Instead it will be shown as 'grey' land within the settlement development area given there is currently no active redevelopment intention/interest. • The settlement development area drawn in the MIR generally reflects the built up areas of Inverness and allocated sites. One reason for this was to provide additional control over development out with allocations to help reduce unplanned, piecemeal development. On this basis it is not considered appropriate to include land at the south eastern edge of IN01. • The settlement development area at the south western edge of the city continues to be considered appropriate as it reflects the built up area of the city. Whilst the provision of additional quality tourism attractions and accommodation is supported in Highland it is not appropriate to include land partially within woodland to the west and allocate for tourism/leisure use given the limited potential for development within this area due to constraints. Should a proposal of this nature come forward in the future, the principle of development would be determined by policies contained in the Highland-wide Local Development Plan. • Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.
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Placemaking Priorities

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

Greenspaces Map

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

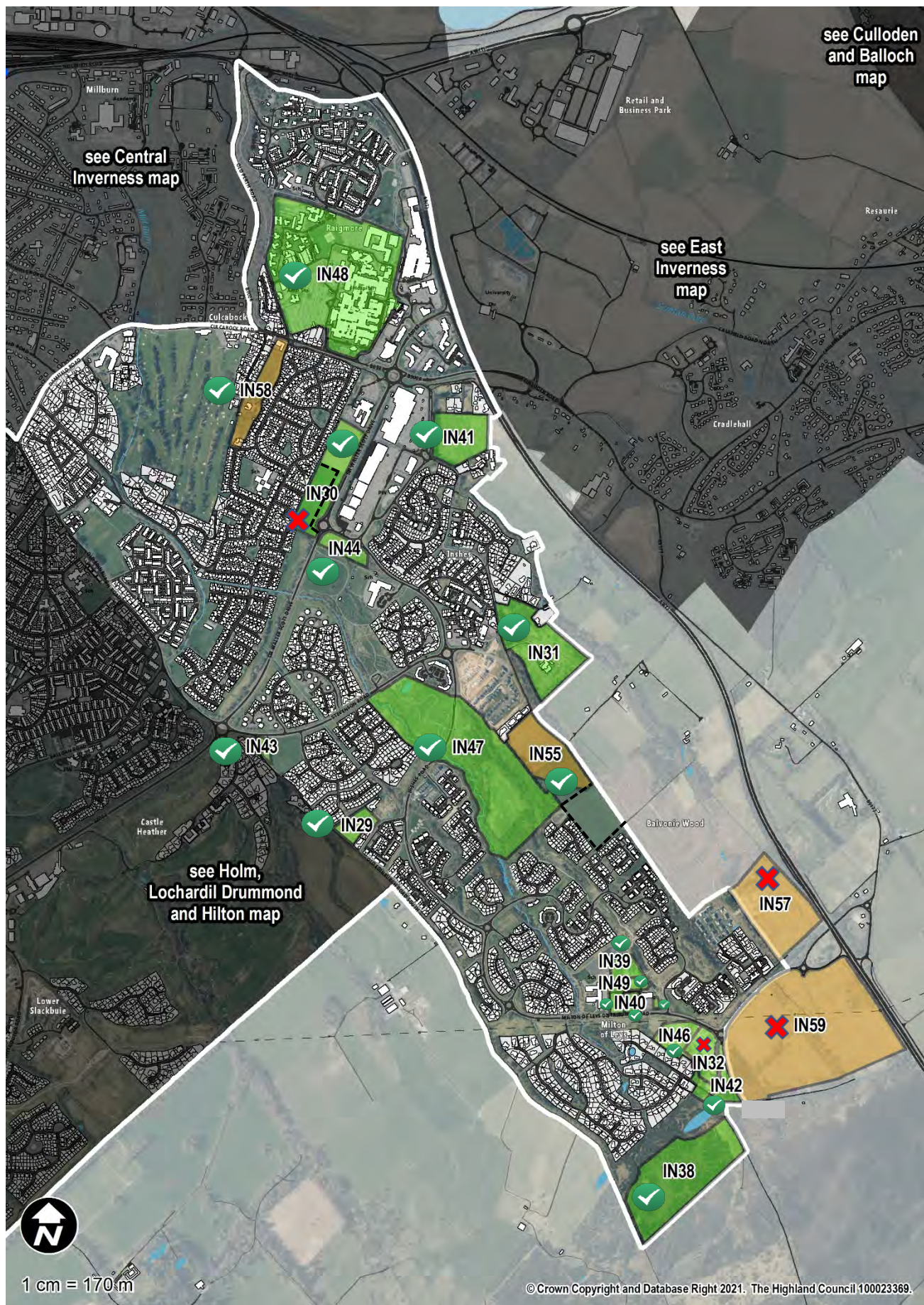


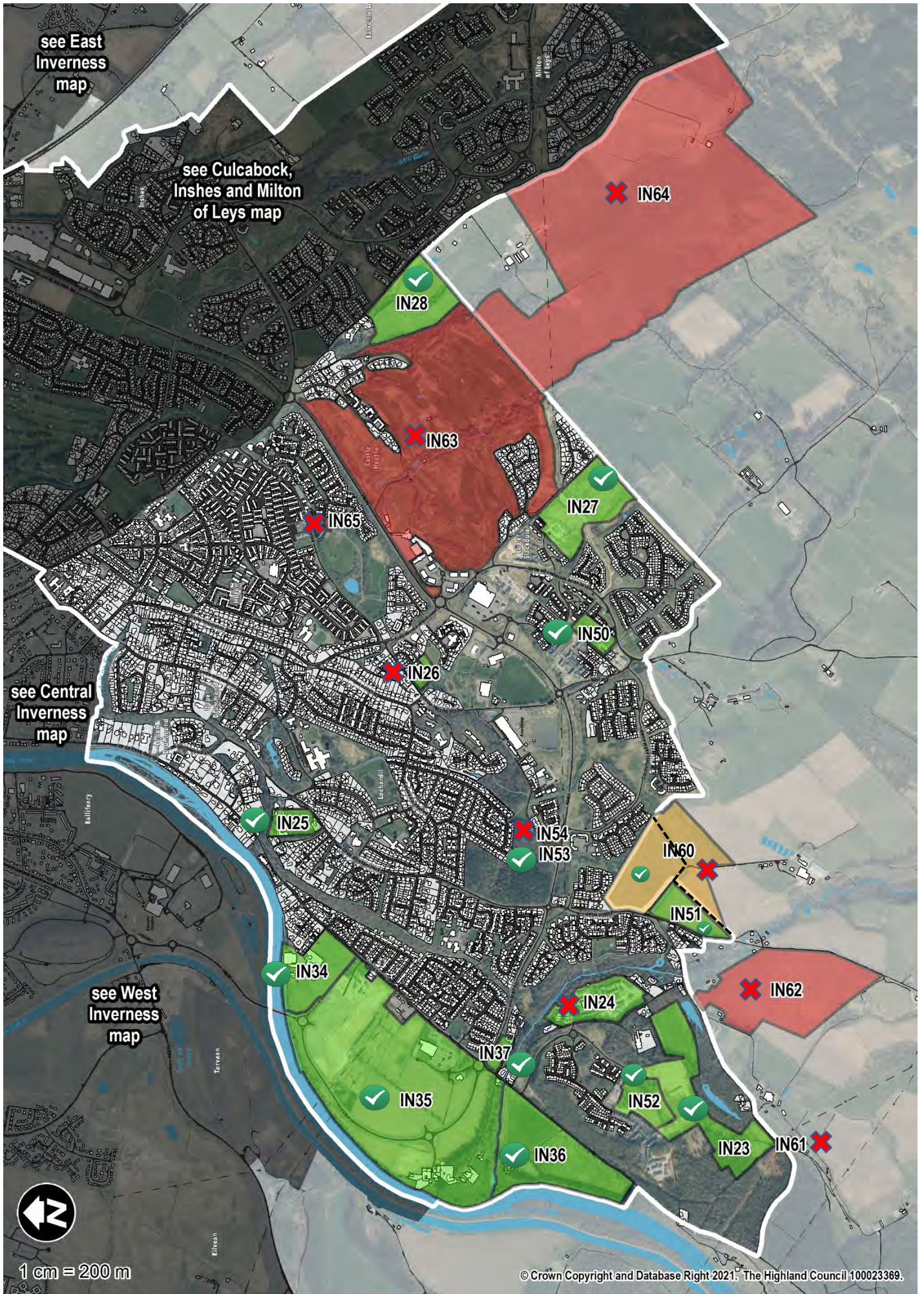
Recommended Development Sites

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

SOUTH INVERNESS

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





see East
Inverness
map

see Culcabock,
Inshes and Milton
of Leys map

see Central
Inverness
map

see West
Inverness
map



1 cm = 200 m

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

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

Placemaking Priorities

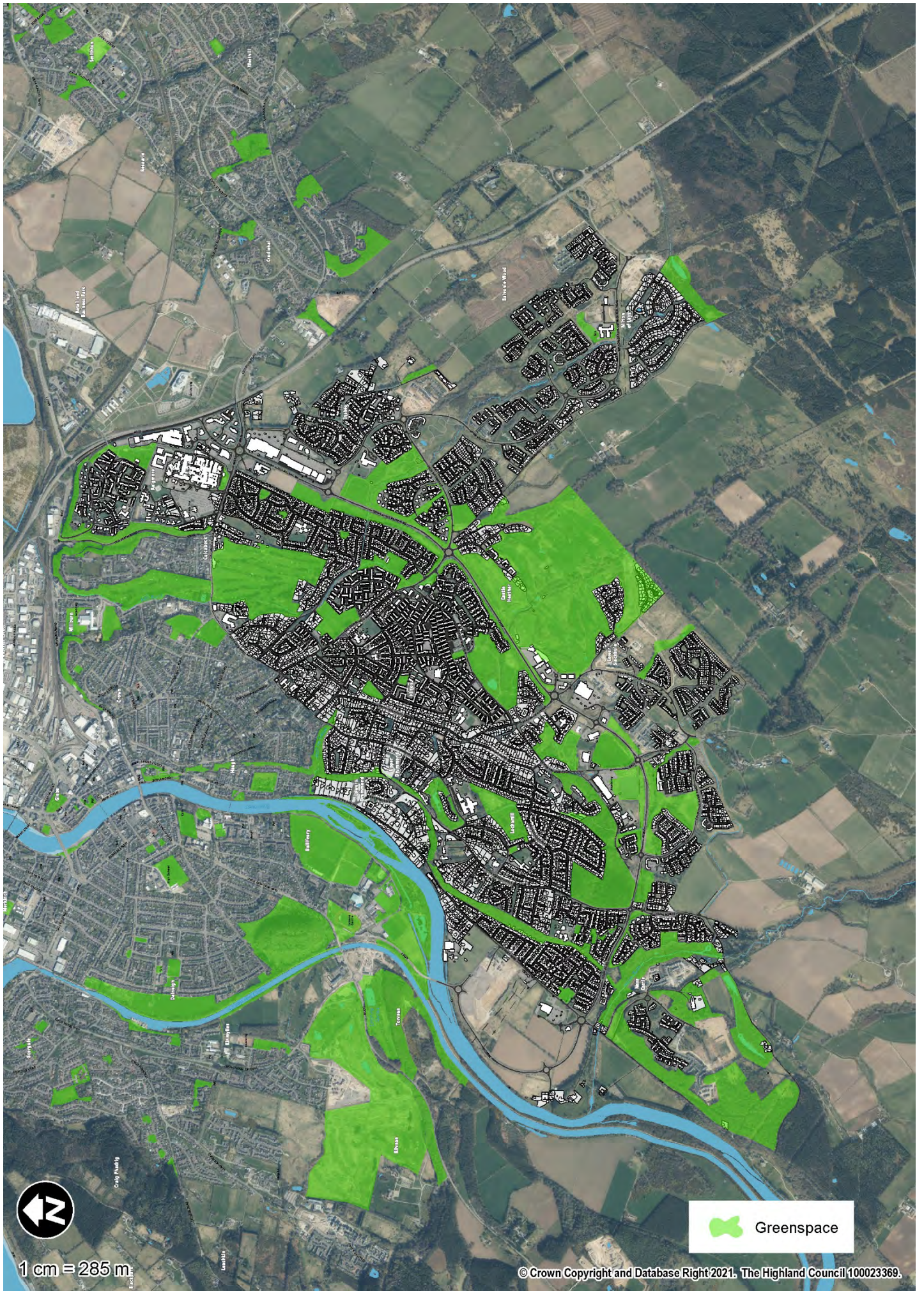
- Support the long-term strategy of delivering new, sustainable city expansions at Ness-side and Ness Castle.
- Encourage more sustainable, walkable communities by delivering neighbourhood services and facilities, as well as housing, in central locations where it is easy to move around by active modes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


Recommended Development Sites

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

Greenspaces Map

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



 Greenspace



1 cm = 285 m

CENTRAL INVERNESS



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

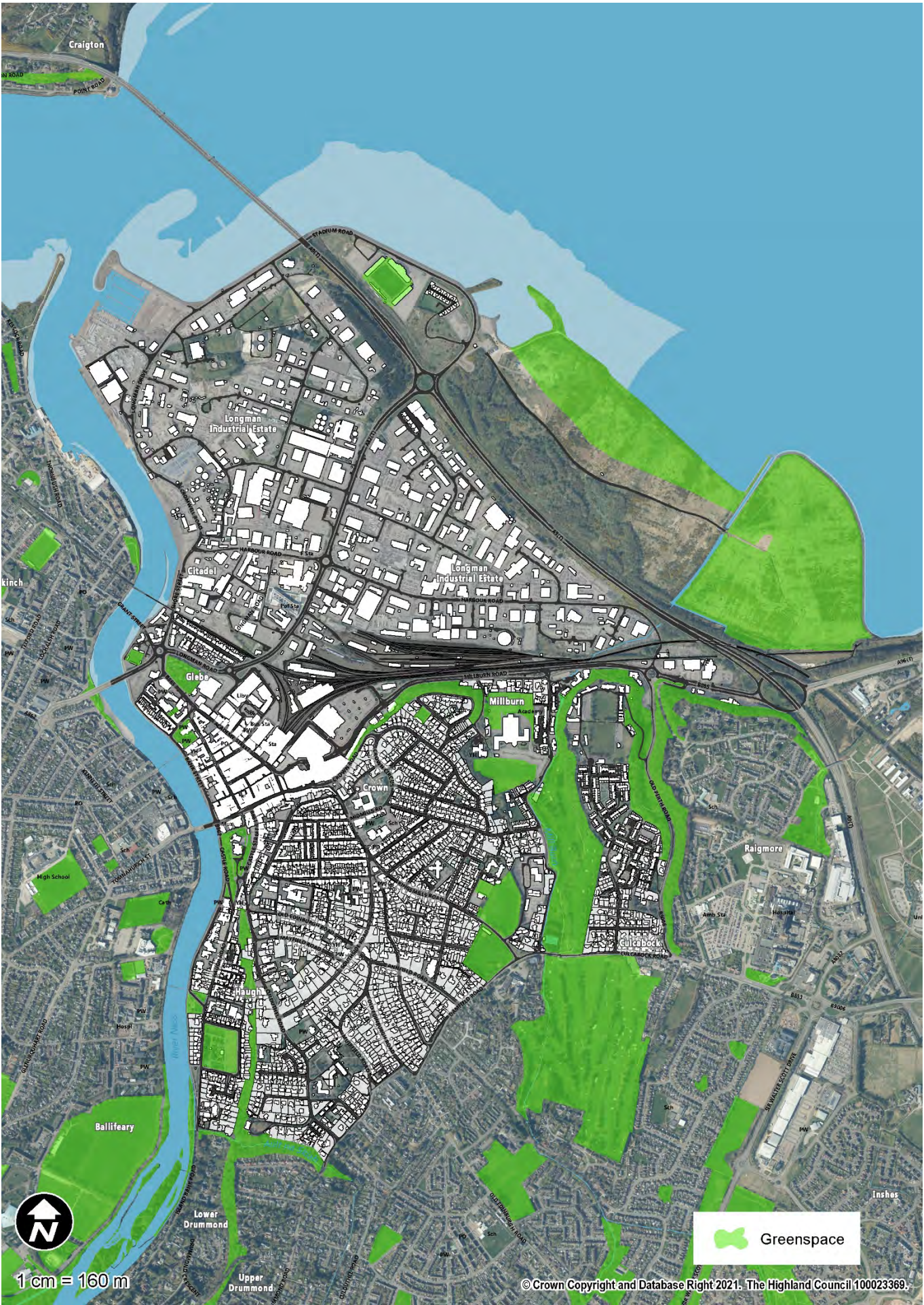
Summary of Issues Raised in Comments	Recommendations & Reasons
<ul style="list-style-type: none"> • Suggestion to include a green recovery plan within the Placemaking Priorities to address biodiversity loss and the climate emergency. • Concerns about allocating land in Inverness Old Town due to potential for impacts on historic built environment. • Concerns over potential impacts on biodiversity and residential amenity north of the Firth, direct impacts on the Moray Firth SPA and SAC, and indirect impacts on other designates sites and species, which require to be carefully assessed and mitigated. Concerns over proposed land reclamation, which could impact resilience of coast to sea level rise and flooding, therefore contrary to key national policy documents. • Transport Scotland highlight potential for some of the development of sites identified to impact trunk roads. • Concerns over loss of parking for Caledonian Stadium for sporting events and impacts on surrounding areas. • Support for expansion of city centre, with potential to meet economic needs, including small-scale industrial/business and significant footfall generating uses. • Support for reconnecting the city centre with a regenerated, mixed-use waterfront that can support economic growth. • Support for inclusion of integrated public transport interchange. 	<ul style="list-style-type: none"> • Placemaking priorities have been revised to reflect the importance of green assets as part of the Climate Emergency and green recovery. • Concerns over potential impacts on the built and natural environment are addressed through Developer Requirements for allocated sites that ensure potential impacts are assessed and appropriately mitigated. • Green space and green networks are identified for the Plan and therefore concerns about impacts on these assets and the wider biodiversity benefits they bring are addressed by the Plan. • A Transport Appraisal has been updated to inform the preparation of the Plan, in consultation with Transport Scotland. Transport issues are addressed in both this document and within the Developer Requirements for specific sites, where impacts can be assessed, and appropriate mitigation put in place. • It is recommended that the Settlement Development Area be amended edited IN72

Placemaking Priorities

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

Greenspaces Map

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



Craigton

RAIGMORE ROAD
POLY ROAD

STADIUM ROAD

STADIUM ROAD

Longman Industrial Estate

Longman Industrial Estate

Citadel

Longman Industrial Estate

Glebe

Millburn

Crown

Raigmore

High School

Ballifeary


Lower Drummond

Upper Drummond

Inshes



1 cm = 160 m

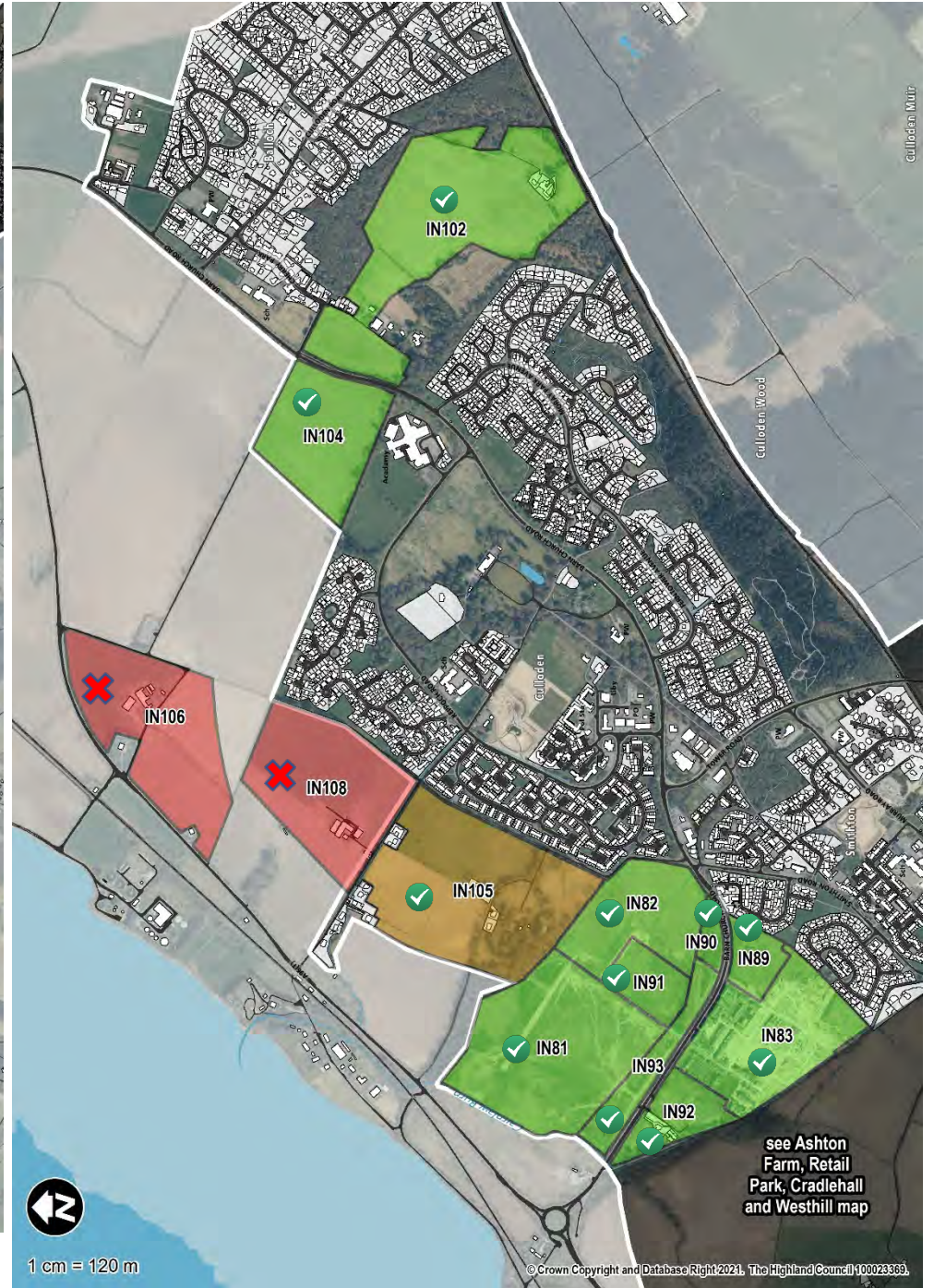
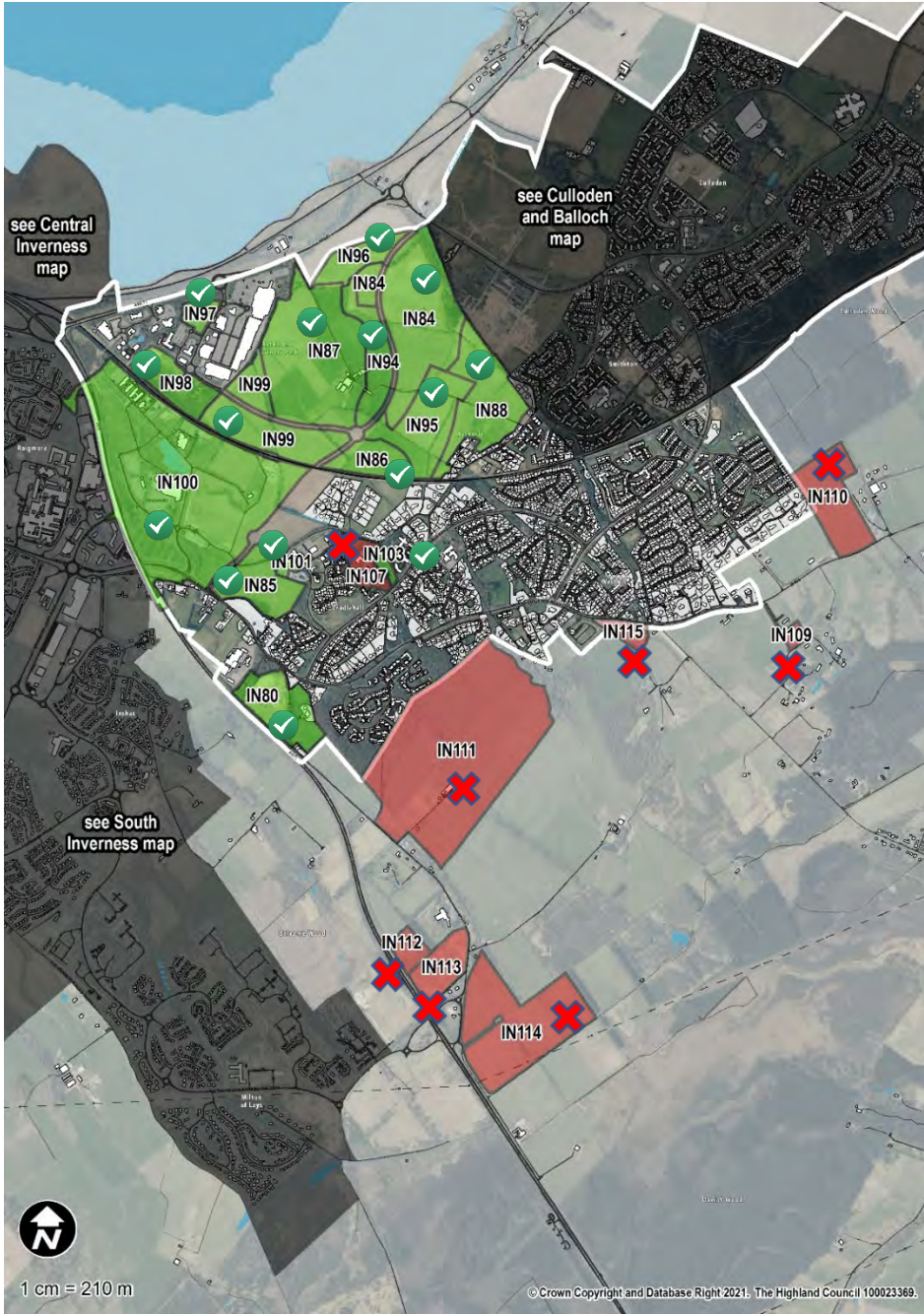
 Greenspace

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Recommended Development Sites

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

EAST INVERNESS



Summary of Issues Raised in Comments (36 comments)	Recommendations & Reasons
<p>GENERAL COMMENTS</p> <ul style="list-style-type: none"> NatureScot requests plan identifies existing and opportunities for green infrastructure to help develop active travel links and improve connectivity for people and wildlife. <p>CULLODEN AND BALLOCH</p> <ul style="list-style-type: none"> Support from landowners for long established development sites at Stratton Farm (IN81, IN82, IN83, IN89, IN90, IN91, IN92, IN93). Landowners committed to continuing to deliver wider site and infrastructure requirements during the plan period. Suggestion that there may be capacity for housing to be developed rather than retail at Stratton Farm, subject to further traffic modelling and mitigation. Objections to IN102 because: loss of greenspace and good agricultural land; impact on woodland and wildlife; limited capacity of roads, schools and other public facilities; road safety issues and no community benefits. Requests, including from Balloch CC, for infrastructure to be provided first and allocation for greenspace and community use only and for these uses as well as housing. Historic Environment Scotland request developer requirements for IN102 require mitigation of impacts on Inventory Battlefield of Culloden, Culloden Muir conservation area and Culloden House Garden and Designed Landscape. Request for large extension/new allocation for 200 homes north and west of IN102 due to future farming viability issues caused by development of IN102. Support for IN104, including from Balloch CC, but preference to be retained as greenspace for sports pitches and all-weather courts; oppose any development of buildings or car parking. Landowner of IN105 wishes site to be allocated for housing as it is allocated in current plan and forms part of a development brief, under control of two developers who are committed to delivering the site and is not constrained by infrastructure or viability issues. 	<p>GENERAL COMMENTS</p> <ul style="list-style-type: none"> The plan will show existing and opportunities for green infrastructure and a reference added to the East Inverness place making priorities. <p>CULLODEN AND BALLOCH</p> <ul style="list-style-type: none"> Allocate sites at Stratton Farm (IN81, IN82, IN83, IN89, IN90, IN91, IN92, IN93) for uses specified in the Main Issues Report and consistent with the Inverness East Development Brief as many of these sites benefit from an extant planning permission and/or an allocation in the current development plan and are detailed in the Inverness East Development Brief. Together they will promote the coordinated expansion of the eastern part of the city. Whilst planning permission is in place at Stratton Farm, the Inverness East Development Brief allows for some flexibility in this area subject to a new planning application with appropriate supporting information. Allocate IN102 given planning permission was granted for 298 dwellings and associated works in August 2021. Specify housing and community uses to reflect planning permission and ensure community use would be provided should any alternative proposals come forward for the site. Specify developer requirement to ensure appropriate mitigation of historic interests. Do not allocate new site suggested north and west of IN102 because it was submitted too late in the plan making process to be fully considered and is not required to meet forecast housing need/demand. Allocate IN104 for redevelopment of Culloden Academy but reduce extent of site to reflect area acquired by the Council for redevelopment of the school. Do not specify form or layout of development to allow for flexibility as proposals are developed. Should built development be proposed within expansion site appropriate mitigation required to limit impacts. Allocate IN105 for housing given that sufficient evidence has been provided to demonstrate the site is viable and not constrained by landownership. Exclude IN106 and IN108 because they are peripheral to the City's structure and facilities. Furthermore, sufficient land is identified to meet the areas housing need and no evidence has been provided to demonstrate the sites are effective. Settlement Development Area (SDA) to be drawn in to exclude allocations that are not confirmed.

ASHTON FARM/RETAIL PARK/CRADLEHALL AND WESTHILL

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

ASHTON FARM/RETAIL PARK/CRADLEHALL AND WESTHILL

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

	<p>as countryside out with the settlement development area would be most appropriate.</p> <ul style="list-style-type: none"> • Do not allocate additional housing site at Myrtlefield as it was suggested too late in the process to be considered and sufficient land is identified elsewhere to meet the areas housing need. • No comments were received on IN100, IN101 and IN85. It is proposed to carry these sites forward to the proposed plan for the uses outlined in the Main Issues Report. • Settlement Development Area (SDA) drawn in to exclude allocations that are not confirmed.
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Placemaking Priorities

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

Greenspaces Map

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

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



Summary of Issues Raised in Comments (15 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • Objections to site KT05, KT06 and KT08 because of settlement pattern, loss of good farmland, sustainability, no quantitative need/demand, and infrastructure capacity issues. • Support for KT01, KT02, KT07 because sustainable, extant permission, fit with settlement pattern, serviceable and/or will deliver much needed community facilities. • Belladrum Estates support KT01, KT02 but oppose KT03 because excessive land take and suggest KT07 for longer term development. • Kiltarlity Community Council supports KT01 and KT02 subject to improved infrastructure, KT03 subject to much reduced size and KT07 if longer term and possible community use. Objects to KT05, KT06 & KT08. • NatureScot suggests woodland and greenspaces as Green Networks (GNs). • Landowner of KT05 & KT08 asserts KT05 sustainable, serviceable, effective and any infrastructure constraints can be addressed via contributions or public investment. Agrees KT08 currently unsuitable. 	<ul style="list-style-type: none"> • Development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school and sewage works can accommodate this limited expansion. Land at Glebe Farm is part developed, part serviced and close to the local primary school. There are other alternative development sites in close proximity to Kiltarlity's facilities but these would open up much larger development opportunities for which there is neither quantitative need nor servicing capacity. The Old Mill is a brownfield redevelopment opportunity that could provide local employment opportunities. Additional lair capacity is likely to be needed at the parish burial ground within the Plan period so a proportionate (reduced) expansion area is safeguarded. • Add better references to need to safeguard and improve GN habitat and active travel connectivity.

Placemaking Priorities

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

Greenspaces Map

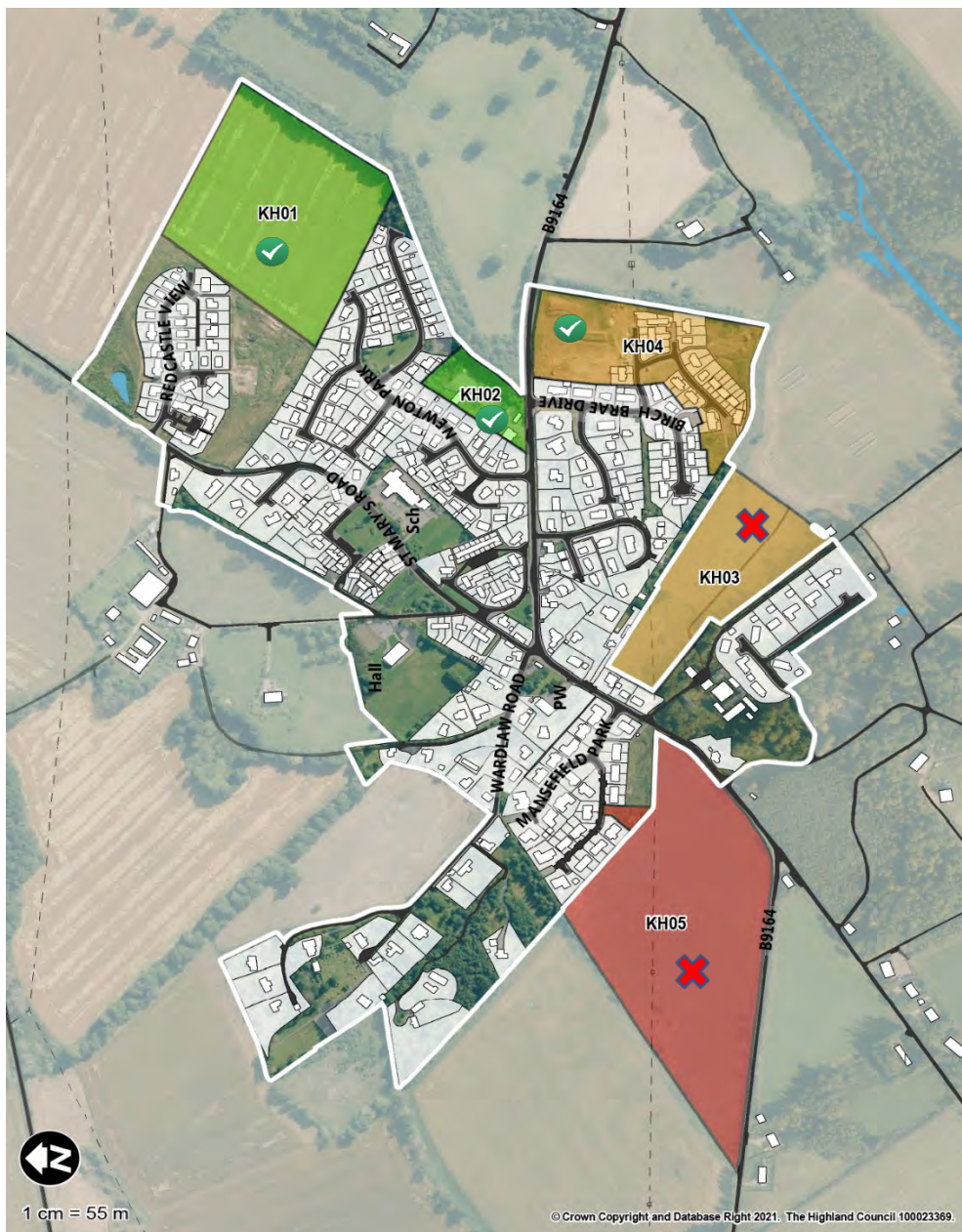
We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

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

KIRKHILL



Summary of Issues Raised in Comments (10 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> • Support for Kirkhill section of strategic cycle route to Beauly and Inverness, to be referenced in Plan. • Support for no development on site KH05. • Opposition to large scale development. • Support for local shop and small scale affordable housing. • Support for restrictive Hinterland policy around Kirkhill. • Proposal for 36 houses on site KH04. • Proposal for 1 house on site of former Clunes House. • Kirkhill & Bunchrew Community Council support tighter control on rural development or seek infrastructure improvements to service it. • Support for protection of local woodland and Green Networks (GNs) as multi use corridors. • Housebuilder proposal for development of KH05 – argue that large scale development will increase local facilities and decrease commuting. 	<ul style="list-style-type: none"> • Future development should be limited to completing sites that already benefit from allocation in the existing development plan and/or have planning permission. The local primary school, with a small extension, and sewage works can accommodate this limited expansion. Land at Groom Farm is permitted, close to the local primary school and is already part serviced. The builder's yard is central to the community, has been underutilised for several years and would therefore benefit from redevelopment. • Other expansion options are not required in quantitative terms and/or suffer from greater constraints. • A single house at Clunes may be acceptable but should be pursued as a housing in the countryside proposal. • Add better referencing to GN and active travel connectivity to reflect comments on these topics.

Placemaking Priorities

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

Greenspaces Map

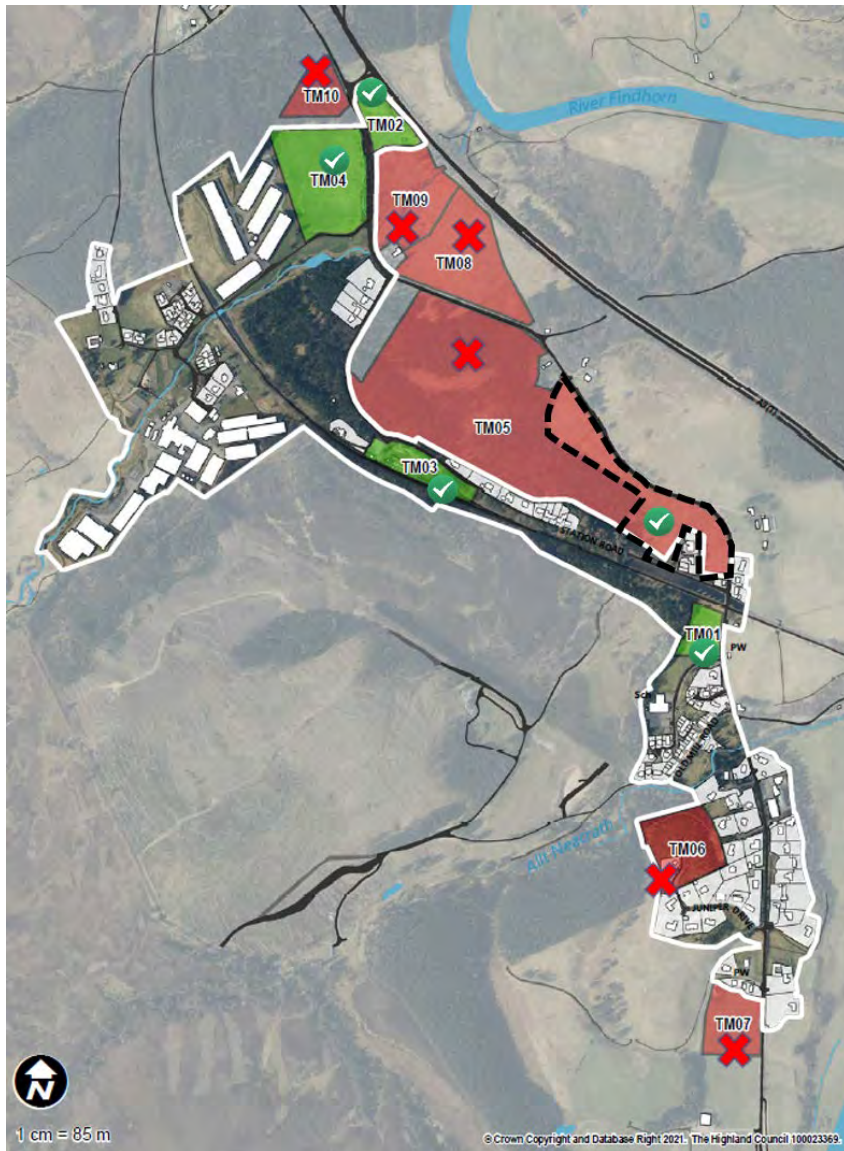
We propose that the Plan's new Greenspace General Policy (see Appendix 2) applies to the areas indicated on the map below.



Recommended Development Sites

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

TOMATIN



Summary of Issues Raised in Comments (6 comments)

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

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

Strathdearn Community Developments (Local Community Company)

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

Tomatin Estate:

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

Recommendations & Reasons

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

<p>affordable housing to offset the requirement for other sites.</p> <ul style="list-style-type: none"> Object to Placemaking Priority to protect all woodland as some areas, including TM5 (adopted Plan ref) includes commercial plantation soon to be harvested. <p>Landowner of Melfort Estate (area around Allt Neacrath) requests: allocation of brownfield site capable of providing 2 homes, no infrastructure constraints, rounds off Tomatin, close proximity to school, alternative access from TM01; and Distillery Wood allocated for tourist accommodation which will help address increase in demand.</p>	<p>travel connections are achievable (see black pecked site boundary on the map opposite).</p> <ul style="list-style-type: none"> Land put forward at Melfort Estate does not meet minimum requirements for allocation in the Plan and such proposals are considered best considered against Highland’s general planning policies.
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Placemaking Priorities

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

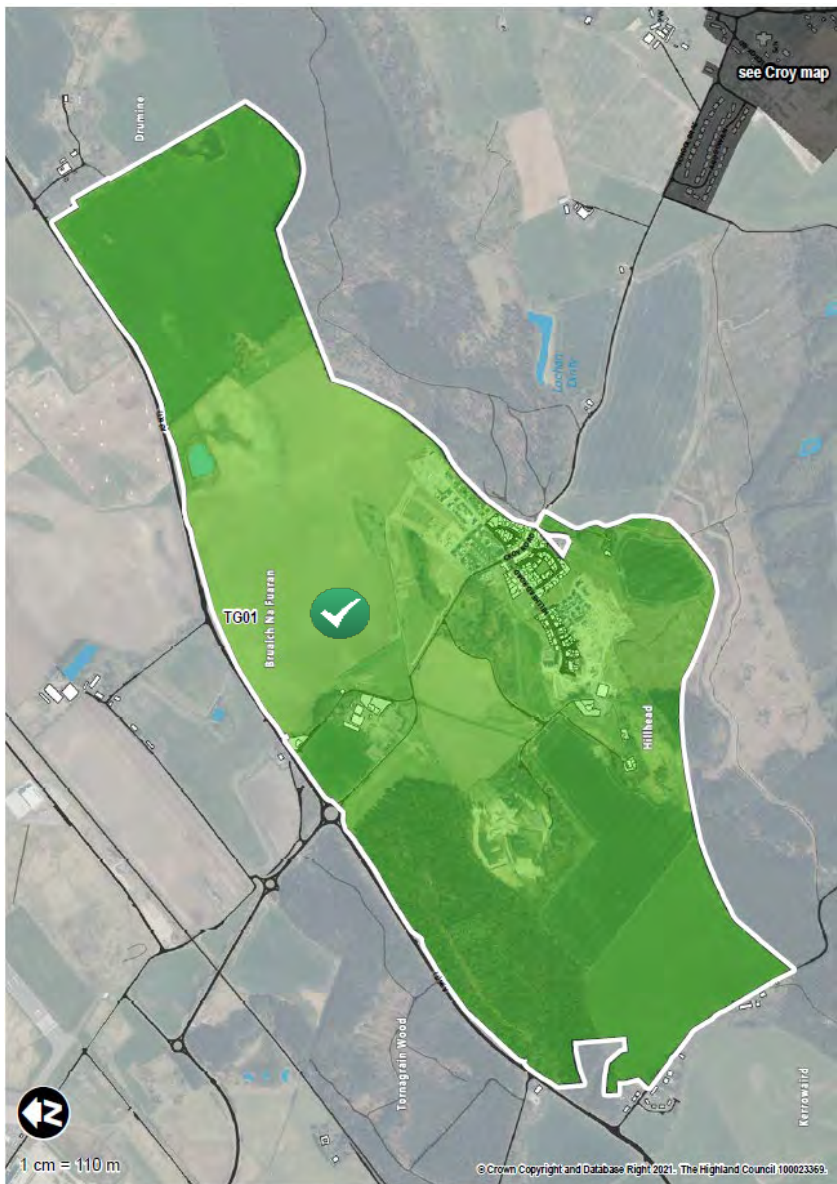
Recommended Development Sites

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

Greenspaces Map

There no protected greenspaces recommended for Tomatin.

TORNAGRAIN



Summary of Issues Raised in Comments

(3 comments)

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

Recommendations & Reasons

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

Placemaking Priorities

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

Greenspaces Map

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

Recommended Development Sites

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

GROWING SETTLEMENTS

Summary of Issues Raised in Comments

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

PLACEMAKING PRIORITIES

ABRIACHAN

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

BALNAIN

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

CANNICH

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

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

FARR AND INVERARNIE

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

FOYERS

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

GORTHLECK

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

INCHMORE

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

TOMICH

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

WHITEBRIDGE

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

ECONOMIC DEVELOPMENT AREAS (EDAs):

CASTLE STUART



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

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

FORT GEORGE



Summary of Issues Raised in Comments (4 comments)	Recommendations & Reasons
<p>NatureScot highlight opportunities for Placemaking Priorities to be included to provide benefits for people as well as protecting the features of the designated sites. Recommend Semi-Natural Inventory Woodland on site is highlighted. Developer requirements should include: preserve and enhance woodland from development and use them as green networks for biodiversity and active travel (similar comments made by RSPB); restrictions of development near the coastal edge south of the B9006; avoid adverse impact on integrity of SPA and SAC and negative effects on GCR and SSSI.</p> <p>Historic Environment Scotland supports the MIR position in recognising the heritage value and the need to consider future uses. Confirm site is now Listed. Data held on potential climate change impacts on the site. Supportive of housing within the potential mix of uses as other examples show how it can work. Keen to work with stakeholders to support suitable future use.</p> <p>DIO (landowners) support the aspirations of the Plan but requests: greater flexibility, particularly housing being part of the mix of uses (it is currently closest to residential use); highlight it is Listed rather than a Scheduled Monument; clarify there are two vehicular access points to the Fort; 0.6ha site to the east should also be allocated. Viable uses will help to ensure coastal maintenance works can be undertaken.</p>	<p>Add requirements: assessment of impacts of coastal erosion may affect developable areas, particularly along edge south of the B9006; preserve and enhance woodland from development and use them as green networks for biodiversity and active travel; avoid impact on environmental designations (effects on SPA to be considered as part of HRA).</p> <p>Inclusion of Housing as part of the mix of uses as, at this early stage, the flexibility ensures all possible options can be explored. Industrial uses have also been included to reflect existing uses south of the firing range.</p>

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

INVERNESS AIRPORT BUSINESS PARK



Summary of Issues Raised in Comments (3 comments)	Recommendations & Reasons
<p>Inverness Airport Business Park Limited (IABP) supports the allocation of its site but objects to Placemaking Priority relating to developer contributions for active travel provision because there is already an agreement in place. IABP questions necessity of new allocation supporting expansion of Dalcross industrial estate given the approved IABP includes industrial uses. If it is allocated then to have IABP support, developer contributions will be required to contribute towards the investment in infrastructure which was made to accommodate growth in the area.</p> <p>NatureScot recommend that these woodland interests should be excluded from the developable area and related developer requirement. Also recommend additional Placemaking Priority relating to enhancement of multi-use green and blue networks which connect to both allocations, Tornagrain new town and rail and air travel options. Badger present so protected species survey required. Mitigation identified through HRA must be included. IA02 - opportunities to create multi-use green networks and to take advantage of the coastal views through development at a landscape scale.</p> <p>Network Rail highlight the proposals to deliver the new railway station and enhanced active travel provision.</p>	<p>To allocate both sites for commercial uses as per the MIR. IABP is a long-established commercial development hub and benefits from significant infrastructure in place. Dalcross Industrial Estate is virtually full, and its allocation could help address the lack of industrial space in certain parts of the Plan area, particularly if speculative units can be built. Development may also help to address surface water drainage issues at the industrial estate and the lack of active travel provision. It is not considered reasonable nor appropriate to seek contributions for infrastructure provision which was agreed to support the IABP.</p> <p>As per NatureScot’s request, developer requirements will be added for: multi-use green and blue networks to key destinations; woodland protection; protected species survey; mitigation identified for European Sites identified through HRA.</p>

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

WHITENESS



EDA Name	Acceptable Use(s)
Whiteness	Industry

Summary of Issues Raised in Comments (4 comments)	Recommendations & Reasons
<ul style="list-style-type: none"> Landowner at the time of the MIR commented - alongside the industrial use, requests the site is allocated for Mixed Use development (housing/leisure) because: assists with addressing climate & ecological emergency; regenerate long term vacant site; utilises existing infrastructure; will provide employment and range of facilities to serve new community; delivers a 20 min neighbourhood; active travel connections to surrounding area; renewable energy can be considered; no evidence that the site should be safeguarded for industry; Plan recognises importance of tourism/leisure to economy; addressing housing demand; renewal application pending (now Minded to Grant); inconsistent with HwLDP; no significant environmental impacts. Also concerned about strategic environmental assessment inaccuracies - water environment has been assessed and development will not have any residual significant adverse effects; mixed use development will have positive impact on openspace, active travel provision, public transport; meets the six qualities of Designing Places; renewal of application demonstrates viability. NatureScot comments that site very challenging due to its location, plus potential and actual impacts on protected areas. Significant coastal erosion issues which may need addressed but will impact on designations. If this EDA is taken forwards into the proposed plan, effects on these European sites should be assessed in your HRA. Confirmation that the Moray Firth 'proposed' SPA has now been designated. RSPB Scotland support the Placemaking Priorities acknowledging the designations but highlight opportunity to incorporate biodiversity enhancement measures. Support Industrial rather than mixed use development. Individual questions retention of Whiteness as an EDA because: significant infrastructure issues; significant flooding and coastal maintenance issues; better alternative sites; viability issues; environmental issues. Better for it to be flagship ecological restoration initiative. 	<p>To continue to allocate Whiteness for Industrial uses because the site has changed ownership since the comments were made on the MIR by the previous owner. The new owners have confirmed plans for energy sector related development. This is consistent with industry data which identifies the site's strategic importance.</p> <p>The environmental concerns are recognised and appropriate developer requirements relating to the environmental designations, biodiversity enhancements where appropriate, and coastal erosion will be added.</p> <p>Within the Plan's revised Spatial Strategy, Whiteness forms part of the Strategic Renewable Energy Zone which is now identified.</p>

APPENDIX 2: STRATEGIC ISSUES: SUMMARY OF COMMENTS ON STRATEGIC ISSUES, RECOMMENDATIONS & PLAN CONTENT

Plan Section	MIR Comments Summary	Recommendations & Reasons
<p>Plan General 11 comments</p>	<p>Query whether Council make decisions in line with its own Plan and enforce it. Criticism of consultation’s timetable, complexity, and ease of use of Portal. Criticism regarding lack of detailed general policies for respondents to react to. Objection to use of permitted development rights for road accesses. Desire for Plan to control negative impacts of forestry. Praise for a logical and well laid out document. Desire for greater community control via Local Place Plan. Request for Plan to take account of independence and likely impact on public finances. Request for greater references to role of natural heritage in placemaking and health.</p>	<p>No additional Plan content other than greater references to the positive effects of natural heritage. Some of the criticisms of the consultation software were well founded but we introduced several workarounds before and during the consultation proposal and continue to work with the relevant external company to improve the customer’s experience. The other comments raise matters outwith the Plan’s scope or control.</p>
<p>New Development Site Suggestions</p>	<p>A few wholly new, mainly housing, development sites have been suggested in response to the Main Issues Report.</p>	<p>These should have been made at the Plan’s Call for Sites stage and therefore have not been considered in any detail in this report and its appendices. There is no exceptional justification for the inclusion of any of them particularly since they haven’t been subject to public comment and environmental assessment. Proponents will have the option to test their suitability via an objection to this Plan, a planning application and/or wait for the next plan review.</p>
<p>Vision & Outcomes 14 comments</p>	<p>Request for reference to national coastal policy. General support for Plan approach on greenspace, travel and climate change but desire for stronger policies and enforcement. Query whether Inverness road schemes run contrary to Outcomes. One suggestion that Outcomes should be changed to support car based, rural development with relaxed approach to housing design. Request for more overt link between habitat enhancement and climate emergency. Request for all communities to be allowed to grow without control. Request for better recognition of Environment as an asset that should be enhanced. Request on reference to link between climate change and built heritage. Request for reference to local setting of outcomes.</p>	<p>Additional Plan content: on importance of natural heritage as an asset that should be enhanced; to cross reference national coastal policy; to make an explicit link between habitat enhancement and the ecological emergency; and, between climate change and built heritage. Most respondents support the principle of the Council’s Vision and Outcomes. The changes requested by the other, minority, polarised opinions are not recommended for inclusion as they would run contrary to established Scottish Government and Council policy.</p>
<p>Addressing the Climate and Ecological Emergency Climate Change General 59 comments</p>	<p>The majority of the general comments about the Climate and Ecological Emergency were supportive. A range of comments and considerations were suggested, including: more awareness raising of the Emergency; tackling carbon emissions from transport; reducing deforestation in Highland, including referring to Scottish Government’s Control of Woodland Removal Policy; avoiding new</p>	<p>The positive response to the proposed approach to the Emergency is welcomed, the range of suggestions for how to tackle the Emergency have been considered in the preparation of the Proposed Plan, several of which are detailed in the specific sections in the following rows of this table.</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
	<p>development on greenfield sites; recognising the positive role of allotments and growing space in tackling the Emergency; making more efficient use of space in new development, incorporating more green and blue infrastructure and biodiversity enhancements. Other comments included concerns about Sea level rise, including in Nairn, and the impacts increased warming will have on built up areas. An assertion that windfarms will adversely impact the tourist economy and should be located closer to the central belt where the greatest demand for energy is and, the suggestion to factor in embedded carbon into the climate impacts of development. It was suggested by two respondents that the ecological component of the emergency be further developed, and that the Plan should work to deliver carbon neutrality by 2045, in line with the Climate Change (Scotland) Act. The role of crofting as a sustainable land use was also suggested to be recognised in relation to the Emergency.</p>	<p>It is recognised that there is a suite of national policy, legislation and regulation that relates to the Emergency so it is not repeated in the Plan, but rather forms part of the range of Material Considerations that are used in the determination of planning applications.</p>
<p>Addressing the Climate and Ecological Emergency Efficient Use of Heat 7 comments</p>	<p>Virtually all respondents who expressed a view supported the principle of addressing climate change and moving towards more energy efficient development. However, several respondents, including some large housebuilders, stated that the best way to tackle the issue is through building regulations and not planning policy. Two respondents highlight the need for a better evidence base for such a policy. Several respondents who supported the policy requested that it be more prescriptive with certain features, e.g. PV panels, being mandatory. One respondent highlighted that the need to improve the efficiency of the existing building stock is of greater priority than new development. Several respondents highlight that transitioning to hydrogen may offer the most energy efficient source.</p>	<p>The Scottish Government are expected to introduce a national policy framework to improve the sustainability of development and set minimum standards. They are also currently consulting on expanding energy efficiency building regulations. However, we will not know the outcome of either of these by the time we finalise the Proposed Plan. To ensure that the Council fulfils its contribution to reaching national net zero targets we need to ensure that appropriate measures are introduced.</p> <p>Taking account of comments and further research, rather than the policy exclusively seeking to deliver sustainable heating systems (as indicated in the MIR), the policy included in the Proposed Plan (see below) now focuses on the development as a whole. The policy introduces a standard reduction which new build development will be required to meet, i.e. reduction in carbon emissions based on current levels. This represents a significant change from the current position and means the developers will need to address several aspects of energy usage and generation as part of development proposals.</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
<p>Addressing the Climate and Ecological Emergency Biodiversity Enhancement 16 comments</p>	<p>Housing developers object to the proposed policy and instead argue that on-site biodiversity enhancement is more appropriate, without the need for developer financial contributions.</p> <p>Private contributors (including Glenurquhart Community Council) support the policy approach, whilst a number comment that they are disappointed with the ecological element and biodiversity sections policies and hope these issues are further developed in order to ensure a positive effect for biodiversity is delivered.</p>	<p>See detailed <i>Nature protection, preserving and enhancement</i> policy wording below. This is a new policy direction across Highland LDP's and has been developed to address the Council Climate & Ecological Emergency declaration and the international issue of biodiversity loss.</p> <p>The proposed policy has been designed to ensure biodiversity loss is considered and addressed for all forms of development, but on larger sites seek a financial developer contribution to achieve a net-biodiversity improvement.</p>
<p>Supporting a strong, diverse and sustainable economy Employment land and sites 6 comments</p>	<p>Overall, respondents agree with the suggested approach set out in the MIR to support the economy to recover, progress and transition, including continuing to allocate larger, strategic employment development sites and the new emphasis on smaller scale industrial / enterprise space within residential / urban fringe development as a means of promoting mixed communities. One community council raised compatibility concerns with the town centre first policy. One industrial business owner highlighted the Council's failure to protect noise generating businesses from residential development. Several respondents, including two community councils, emphasised the importance of prioritising brownfield land over greenfield. Landowner of Fearn Aerodrome EDA objects to its deallocation. Comments were received in support and against the Freeport bid, particular concerns related to a perceived relaxation of environmental regulations.</p>	<p>Additional Plan content proposed including a new feature added to the Spatial Strategy map to highlight the strategic role which the Inner Moray Firth area can play, particularly the key ports, in supporting the regional and national transition to a green economy and the deployment of renewable and low carbon energy generation.</p> <p>A revamped Industrial Land Policy (see detail below) requiring employment land to feature within large residential developments (as outlined the MIR) and that will also safeguard existing industrial sites and allocations from other uses and encourage residential developers to bring forward small scale employment components where appropriate. This policy will also refer to the 'agent of change' principle to safeguard existing noise generating businesses.</p> <p>Our site selection process has focused on brownfield land, with allocation of greenfield land only supported where no reasonable alternative is available.</p>
<p>Supporting a strong, diverse and sustainable economy Growing Sustainable Tourism 28 comments</p>	<p>There was widespread support for growing the tourism industry and most respondents agree that it must be done sustainably. This includes appropriate levels of infrastructure delivery (e.g. sufficient investment in active travel and public transport and toilets / waste management facilities) and only where the environment and natural assets are not undermined by development. The impacts and benefits also need to be considered in relation to the effect on local communities.</p>	<p>The approach set out in the MIR aligns with many of the comments - particularly the need for the tourism industry to grow sustainability (in terms of infrastructure delivery and providing more sustainable transport options). We propose to continue this position within the Plan. On the Spatial Strategy Map we propose to include Sustainable Tourism Potential Growth Areas which highlight where upgraded infrastructure is in place or being actively planned to support wider tourism development. This includes the Loch Ness area shown in the MIR, together with the area</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
	<p>Several respondents raised concerns about Loch Ness being the only area identified on the map. Some suggested that the Black Isle, Strathdearn, Easter Ross and Nairn form equally important tourism areas. Two respondents questioned the appropriateness of North Sutor (viability and adjoining 'bad neighbour') for tourism development.</p>	<p>covering the north east of the Black Isle and part of the Nigg Peninsula in Easter Ross, and Nairn.</p> <p>The reference to the Agent of Change principle included within the Industrial Land Policy will ensure that sites such as Port of Nigg are not affected by more noise sensitive uses proposed nearby.</p>
<p>Growing the most sustainable places Housing Requirements 25 comments</p>	<p>Objectors to further development claim figures too high and development industry claim figures too low. Some support for stated figures. Some wish a greater proportion of total to be safeguarded for a particular sector, e.g. young, locals, crofters, affordable, self-build and/or elderly. Some developers dispute whether capacity of preferred sites will meet all requirements and claim some of these sites are not effective. Several point out Housing Need and Demand Assessment (HNDA) is out of date and should be done first. Developers claim figures should include aspirational, economic recovery, high in-migration requirements. Some developers suggest additional sites to meet housing requirements. One suggestion that requirements should be based on infrastructure capacity not need/demand.</p>	<p>See below for detailed table of Housing Requirements. This recommends that the Plan's Housing Requirements be based on a new HNDA but with this base number adjusted upwards to reflect future ineffective stock, an allowance for flexibility/choice, currently unaccounted for housing need, and an economic recovery aspiration within the Mid and East Ross Housing Market Areas where Opportunity Cromarty Firth will hopefully lead to a new jobs-led growth in housing need/demand. Unfortunately, the Council cannot specify in its Plan that certain sites are reserved for certain sectors or types of people. This may be desirable but would require a change in national legislation. We must identify a total housing land supply based on all assessed need and demand not other factors such as infrastructure capacity.</p>
<p>Growing the most sustainable places Settlement Hierarchy 44 comments</p>	<p>Some believe the hierarchy should be based solely on infrastructure capacity. One respondent disagrees that the hierarchy should be based on where it's economic to add infrastructure capacity. Several respondents believe the hierarchy is too prescriptive and that each community or the development industry should decide how much growth it wants. Most support the hierarchy as listed and want it enforced. Some respondents want Drumnadrochit, Nairn, North Kessock, Avoch and Fortrose/Rosemarkie to be in a lower tier as they are not currently sustainable locations for growth. One respondent disagrees that rural areas should have less growth. One respondent wants Culbokie to be a higher tier settlement because it has spare infrastructure capacity. Landowners at Inchmore, Fort George, Ardross, Whiteness, Portmahomack, Borlum, Bunoit, Tore want their locations classified as higher tier settlement. Request that lower tier settlements have good active travel links to higher order centres. Network Rail don't support Evanton and Tomatin being in a higher tier because no commitment to investment in rail halts at these locations.</p>	<p>Reaffirm hierarchy trailed in Main Issues Report – i.e. the only changes are Cawdor, Contin and Inchmore changing from Main to Growing Settlements (detailed table below). Objectors seek reclassifications to reduce growth and the development industry to increase it in particular locations. However, the majority of respondents agree the viability / sustainability basis for classifying settlements and directing growth. Infrastructure capacity is one criterion in shaping the hierarchy but shouldn't be the primary one if climate change and other environmental issues are to be addressed within Highland. The wider Plan content requires / supports improved active travel links within and between identified settlements. Evanton and Tomatin's classification is not based solely on their potential rail halt connections.</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
<p>Growing the most sustainable places Growing Settlements General Policy 16 comments</p>	<p>Most comments are supportive of the proposed policy. One suggests that net positive impact should be the sole criterion in deciding whether to support a rural development. Some respondents believe development should only be supported if there's: a full Sustainability Assessment undertaken; adequate transport capacity; adequate heritage safeguards/enhancement; improved active travel connectivity; home working; demonstrable benefit to and support from the local community; and/or, low carbon impact.</p>	<p>See detailed <i>Growing Settlements</i> policy wording below. This wording is very similar to that used in other adopted Highland development plans to ensure a consistent approach. The individual topics highlighted by respondents are addressed by the list of criteria however we don't agree that an overriding positive or negative presumption in favour or against development should apply based on any single criterion or factor.</p>
<p>Growing the most sustainable places Self Build Housing General Policy 25 comments</p>	<p>The majority of respondents (including Lochardil Drummond Community Council & Dores and Essich Community Council) agree with the Council's ambition to increase self-build housing, but all the major housebuilders disagree with the proposed policy, as they believe it could affect the viability of delivering housing, have implications on site health and safety and the ability timely to deliver site services.</p> <p>A number of respondents highlighted that this appears to be a fast-growing sector and more should be done to promote it because it; delivers a variety of types, styles and sizes of houses; and could support co-operatives and community-led housing schemes.</p> <p>Conversely, a number of responses question the need for a policy on self build, arguing that it is untested within urban areas and that anecdotal evidence is that most self-builders wish to reside in the countryside.</p> <p>A landowner and a respondent support the allocation of sites for Self-build rather than the proposed policy approach.</p> <p>One respondent suggested that the threshold at which the policy is proposed to be applied is too high and should be lowered to 10 or 15 units.</p>	<p>See detailed <i>Self & Custom Building Housing</i> policy wording below. This is a new policy direction across Highland LDP's and has been developed to promote and support urban self-build plots, as such it is understandable that some adverse comments have been received.</p> <p>However, both the Scottish Government and Council wishes to support this sector. We propose adjustments to the MIR approach, the main one is pushing the threshold when the policy is enacted up to 100 (it was 20 in the MIR). Doing so reduces the number of plots being delivered by the policy, which allows the policy to be tested and avoids the provision of a lot of single self build plots in smaller developments.</p> <p>An alternative approach of allocating sites for self build within urban areas was fully considered but has been ruled out as the proposed policy offers greater flexibility and avoids making allocations undeliverable.</p>
<p>Growing the most sustainable places Town Centre First General Policy 28 comments</p>	<p>The vast majority (almost 90%) of respondents support the proposed Town Centre First Policy. This included Lochardil Drummond Community Council and Dores and Essich Community Council and organisations such as the owners of the Eastgate Shopping Centre. Respondents also highlighted: the uncertainty which the pandemic will have on town centres; greater effort required to make town centres sustainable, high quality, welcoming and attractive</p>	<p>We propose to take forward the <i>Town Centre First Policy</i> (see below) in a similar fashion as shown in the MIR but with several amendments, including: clarifying the requirement that footfall generating uses <i>must</i> be located in town centres and the highlight the expectations of any sequential assessment; and, providing greater certainty and flexibility for change of use proposals. Other amendments include: highlighting within the policy the potential for a</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
	<p>places; and, greater mixture of housing options and not a concentration of bedsits etc.</p> <p>Requests were made to: allow greater flexibility and provide certainty for redevelopment proposals to other uses; tighten up on preventing footfall generating uses out of town centres; and, allow the wide range of uses supported in the policy to be reflected in the town centre allocations.</p> <p>One respondent highlighted that the planning policy is not effective to deal with the issue.</p>	<p>reduction/removal of the standard 25% affordable housing contribution policy as a means of encouraging a greater mix of housing types/tenures; and, the inclusion of reference to the Agent of Change principle to help protect existing noise generating businesses.</p>
<p>Delivering Affordable Housing General Policy 27 comments</p>	<p>Some respondents seek a stronger policy to achieve more houses, lower prices and lower rents. Some agree with the proposed approach. Developers disagree with any further intervention in the private housing market as it will undermine viability. Developers claim best way to increase affordable units is to increase total requirement – i.e. 25% of a bigger number. One comment that smaller units will be more affordable. One comment suggests preventing loss of stock to holiday homes. One comment suggests policy should apply to less than 4 units another that it should be increased to 12. One comment that 35% target should apply to whole Plan area. One comment seeks closer geographic ring fencing for commuted payments. One respondent seeks a quota based on bedrooms not units to allow a developer to provide fewer but larger affordable units. One respondent seeks an affordable housing use class and affordable housing only allocations.</p>	<p>See detailed <i>Increasing Affordable Housing</i> policy wording below. This wording reaffirms that we will seek 35% affordable housing within Inverness City but now excepting proposals within the City Centre boundary. It also encourages the earlier phasing of affordable units within larger sites and accepts higher densities for affordable housing developments if placemaking is not compromised. See above regarding the legitimate scope to increase overall housing requirements. The threshold of 4 units is embodied within the current Highland wide Local Development Plan and needs to await that Plan’s review. Increasing to 35% requires a local, specific justification which we believe is only reasonable for Inverness City. The geographic ring fencing of commuted payments should be reviewed but will need to await the review of the relevant detailed guidance. The suggestions regarding a use class, allocations and occupancy control to ensure more affordable units are sensible but would require national legislative change. The suggestion for a quota based on bedrooms not units may not address the housing type breakdown of need in a particular community but will be discussed with providers to see whether the detailed guidance on affordable housing should be amended to allow this as an option for developers.</p>
<p>Matching development with infrastructure capacity 26 comments</p>	<p>Many respondents believe infrastructure and community facility capacity should be in place before or at the same time as new development. Comments that facilities should include healthcare, greenspace and active travel network capacity. Developers believe it will be unviable for them to provide infrastructure first. One suggestion for</p>	<p>See detailed <i>Delivering Development and Infrastructure</i> policy wording below. This wording adds health facility, rail and active travel network capacity and an onus on the developer and the Council to better check and assess the impact of individual developments on the capacity of listed community facility and infrastructure network capacities. It</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
	<p>development moratorium until public finances can catch up and provide capacity. Suggestion for more public money to resolve deficiencies. Network Rail seek developer contributions to offset impacts on rail capacity.</p>	<p>introduces a presumption against proposals that don't demonstrate that adequate capacity exists or can be created. The Council's detailed guidance on developer contributions already allows developers to produce evidence that Council requirements make a site unviable. The other respondent suggestions are interesting but would require central government financial intervention which is a matter outwith the Plan's control.</p>
<p>Creating a more healthy, sustainable transport network Sustainable Transport Policy & Sustainable Transport Interventions 80 comments</p>	<p>Most respondents support the proposed approach to creating a more healthy, sustainable transport network. The broad range of benefits, in terms of environment, public health and alleviating congestion are recognised. Support for community involvement in delivery of active travel infrastructure, with a range of place-specific improvements suggested. Suggestion to place emphasis on public transport (bus and rail) to reduce car-dependence. Support for delivery of improved Electric Vehicle infrastructure and network planning, but some respondents highlighting that there is still pollution associated with this mode of transport, along with prohibitive costs for those on lower incomes. Suggestion for parking charges to be raised by the Council; for a blanket implementation of 20 mph in settlements, and some disagreement about the assertion that building more roads increases congestion. Suggestion for the preparation of an action plan to deliver the strategy proposed, with a focus on a green recovery from Covid-19. Some concerns from developers and landowners about the role of a new transport policy, and if it will be too onerous for development sites outwith Inverness.</p>	<p>The Proposed Plan sets out the key interventions required to deliver transport improvements across the region, including active travel network improvements; public transport development, and road network improvements. Details of these interventions are high-level and will require further feasibility and design development, which will bring with it a full opportunity for public consultation and Member scrutiny. Electric vehicles and public transport are explicitly recognised as key components of the transport strategy for the Plan area, particularly in supporting those living in rural areas, or where longer journeys are involved. Coupled with active travel improvements in more urban areas, public transport and electric vehicle improvements will deliver the vision for a more mixed, less carbon-intensive transport network. The <i>Transport Policy</i> set out in the Proposed Plan (see below) provides the opportunity for flexibility and measurement of transport impacts relative to the place and journeys where a development proposal is located.</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
<p>Identifying and safeguarding valued, local green space</p> <p>Greenspace Audit and Policy 46 comments</p> <p>and Green Networks Policy 17 comments</p>	<p>Most respondents support the proposed approach to safeguarding greenspace and green networks. A range of suggestions were made to improve the approach, including: an audit of existing greenspace; specific requirements for areas of greenspace such as for food growing to be defined; using greenspace designations to inform the Woodland Strategy; using developer contributions to purchase amenity land; involving communities in deciding what greenspace to safeguard; mapping of greenspace to be protected; design and stock new greenspace with native species to improve biodiversity; focus of safeguarding as well as enhancement, including outlining opportunities for these spaces in the Plan; recognise croft land as greenspace, and better define green infrastructure. Several comments were received suggesting greenspaces to be considered and changes to the proposed audit methodology. One respondent considered there was insufficient information and provision for new greenspaces to be suggested for inclusion. One respondent disagreed with the Greenspace policy, arguing it did not provide adequate protection, compared to an area being within the Hinterland, and that greenspace should be safeguarded outwith Settlement Development Area boundaries.</p>	<p>Suggestions received for new greenspaces were incorporated into the audit of greenspace that has informed the Proposed Plan. Suggestions for changes to the methodology, the policies and the requirements placed upon developers have all been taken into account in undertaking the audit and in preparing the Proposed Plan. The work undertaken has resulted in greenspace and green networks being safeguarded through policy and mapping in the Proposed Plan, it is therefore considered that this provides the correct level of protection for these areas. It is considered that safeguarding greenspace and green networks within Settlement Development Areas is the appropriate approach, and that outwith these areas Highland-wide Local Development Plan policies be applied. See Appendix 1 for proposed greenspaces for each main settlement.</p>
<p>Placemaking 29 comments</p>	<p>Most respondents (including Dores and Essich Community Council, Glenurquhart Community Council & Nairn River Community Council), most multiple housebuilders support the proposed policy, providing it offers sufficient flexibility; the audit is not overly prescriptive; considers the broader impacts of a development; and respects Community Action Plans and Local Place Plans.</p> <p>A number of respondents suggest minor amendments to the criteria outlined within the Placemaking Audit. One respondent believes the Planning System needs to be streamlined, not making it more complex / demanding and it is not clear how these new tools are to be used, and on what size of development.</p>	<p>See detailed <i>Placemaking</i> policy wording below and detailed Placemaking Audit. It is pleasing to note that most contributors support the policy & the Placemaking Audit.</p> <p>As per the suggestions, the Audit has been updated to respect the comments and it (and the policy) has been developed to provide sufficient flexibility in its use.</p>
<p>Meeting the needs of an ageing population 30 comments</p>	<p>Most housebuilders and a small number of respondents object to the proposed policy as: Definitive quotas are an inappropriate instrument; policy coupled with other</p>	<p>See detailed <i>Accessible and Adaptable Homes</i> policy wording below. This is a new policy direction across Highland LDP's and has been developed to address</p>

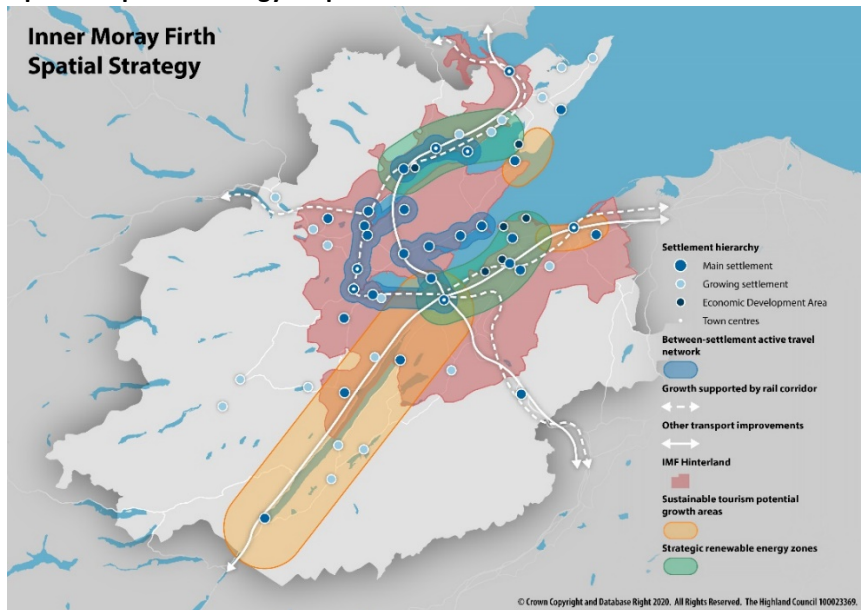
Plan Section	MIR Comments Summary	Recommendations & Reasons
	<p>percentage policies (AH & SBP) will be too restrictive on the housing mix; The policy could have a negative effect on affordability of housing; The benefits of this need to be carefully weighed against the effect on housing affordability and increase in unviable zonings; No data on need has been presented, so unable to confirm if Highland is currently experiencing issues with a lack of supply of this tenure; If there was a demand the development industry would deliver the required type and mix and therefore it should be market led rather than planning policy; and Policy is not required as Housing for Varying Needs requires adaptable homes and building standards are expected to be reviewed in 2021 which will both cover this need.</p> <p>Conversely, one housebuilder, one private developer, Dores and Essich Community Council, Ferintosh Community Council, and a number of private comments support the proposed policy, with one stating that as Highland population is aging the percentage as proposed is too low. However, it was also suggested that the policy favours the elderly, when priority should be in retaining the youth and educated, skilled individuals.</p> <p>A number of respondents suggested changes to the policy, including; relating to ground floors of properties and on level plots only; Housing quality should be the same as other properties within the development; The form of housing tenure to be sited in consideration with accessibility to local services; Include the provision of 'smarthousing' to combat pressures of social care and isolation (FIT Housing / nextdoor software); and Policy should include refurbished and converted properties.</p>	<p>Highland's rapidly aging population, evidence of which is included in the policy supporting text. Following consideration of the MIR feedback, the policy has been restricted to cover the ground-floor and access to the properties only. Whilst this policy is primarily developed to support Highland's ageing population, the properties it will deliver, can be occupied by any wheelchair disabled occupant and therefore will support all Highland residents regardless of age.</p>
<p>Spatial Strategy Map & General 5 comments</p>	<p>Respondents expressed general support for the Spatial Strategy (although see Settlement Hierarchy comments above). Some wished for more emphasis on green assets and strategic active travel routes.</p>	<p>The amended Spatial Strategy Map is shown below. Strategic active travel routes have been added. Green networks and spaces are only depicted at the main settlement scale where they have been audited and where they can most appropriately be safeguarded / enhanced.</p>
<p>Housing in the Countryside Hinterland Boundary 27 comments</p>	<p>Most respondents want the Hinterland Boundary retained as existing as better for the environment and public purse. One comment seeks its expansion. One comment wants its related Hinterland policy changed to prevent holiday home exceptions. One landowner seeks a more positive policy around Tomatin. One respondent seeks a weaker related</p>	<p>The proposed Hinterland boundary is shown on the Spatial Strategy Map below. This reaffirms a largely unchanged boundary save the minor expansion at Belivat, Nairnshire. The majority of respondents support this approach. Those wishing to change the related policy and list of permissible exceptions to the negative presumption will need to await</p>

Plan Section	MIR Comments Summary	Recommendations & Reasons
	policy that allows self build for locals. Two respondents seek an exception for related family need. One seeks a tighter policy at Blackpark and one at Kirkhill / Bunchrew. One developer seeks the removal from the Hinterland of Rhicullen / Newmore.	the review of that policy in the Highland wide Local Development Plan. The boundary contraction suggestions would not be good for the environment or the public purse and are therefore not recommended.

Updated Plan Outcomes

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

Updated Spatial Strategy Map



Updated Settlement Hierarchy

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

Housing Requirements

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

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

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

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

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

GENERAL POLICIES

Policy 1: Low Carbon Development

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

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

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

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

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

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

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

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

Policy 2: Nature Protection, Preservation and Enhancement

All Developments:

Developments must not result in a negative impact on biodiversity either directly or indirectly and in compliance with the Council Climate Change and Ecological Emergency declaration and the provisions of the Planning (Scotland) Act 2019, all developments must demonstrate that the mitigation hierarchy has been considered and applied within the Supporting Statement submitted as part of an application.

All developments must protect, preserve and improve on-site native biodiversity assets, and this must include the consideration and provision of the following:

- Safeguarding Statutory designated sites
- Invasive non-native species (INNS) removal;
- Wetlands habitats and watercourses improvements and creation, including around SUDs systems;
- Food growing spaces;
- Hedgerow and wildflower meadows;
- Provision of nesting opportunities;
- Safeguarding of carbon rich soils;
- Protecting existing trees and woodland areas (excluding commercially grown woodland);
- Provision and protection of Greenspaces;
- Provision, protection and extension of onsite and adjacent Green Networks;
- Retention of marshy grounds
- Provision of green/living roofs
- Protection and provision of wildlife corridors.

Larger Scale Developments:

The protection and provision of the above, is not considered enough to mitigate and compensate for the loss of biodiversity on larger developments. Therefore, to achieve a positive biodiversity enhancement across the whole Inner Moray Firth area, all developments of 4 or more residential units and all commercial, business and retail developments over 1hectare must provide a financial developer contribution based on the total area of the site.

The proposed contribution is set at a flat rate of £2,480 per hectare of sealed surfaces. This figure is based on the average Forestry and Land Scotland grant rate for planting native broadleaf and conifer species (not productive woodland) in standard rather than the more expensive priority areas.

Should the developer contribution section of this policy, render any site unviable, the developer can submit an open book viability assessment as part of the planning application submission. Where the viability assessment following independent review by the Council (the cost of which is to be borne by the applicant), confirms the payment of the developer contribution in compliance with this policy is not viable, the financial amount can be reduced accordingly. Where exemptions are justified on viability grounds, the minimum reduction in financial contribution will be levied.

Policy 3: Greenspace

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

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

Policy 4: Green Networks

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

- affects the physical, visual and habitat connectivity (The continuity and accessibility of that Network for people and wildlife whether those users wish to enter, pass through, travel along or derive public amenity value from that Network because of its visual continuity and accessibility) (either adversely or positively) of that Network; and
- offers any mitigation of these effects.

Policy 5: Industrial Land

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

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

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

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

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

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

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

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

Policy 6: Town Centre First

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

Developers need to consider how appropriate the nature of their proposal is to the scale and function of the centre within which it is proposed. Exceptions may be made for any ancillary uses that support existing and proposed developments.

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

Significant footfall developments include:

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

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

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

Proposals for conversion of buildings to other footfall generating uses, including to residential use, in town centres will be supported, providing there is no loss of existing or potential viable footfall generating use(s). Proposals for conversion to residential use must demonstrate that the development will not adversely affect the town centre's prime retail area and that the property has been marketed for its existing use at a reasonable market price/rent without success for a minimum period of 6 months. For upper floor conversions (excluding hotels) support will be given without the requirement for marketing where it can be demonstrated that the proposals would contribute towards a balanced mix of uses.

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

Policy 7: Placemaking

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

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

Developments proposals of 4 or more dwellings and major non housing applications must submit a completed Placemaking Audit based on the criteria outlined in the Placemaking Audit. Conformity with all the "Essential" criteria must be demonstrated as part of the application submission and adequate demonstration of also meeting the Audit's "Desirable" criteria will classify the proposal as having a net positive effect, and thus conformity with this policy.

Policy 8: Delivering Development and Infrastructure

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

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

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

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

Policy 9: Increasing Affordable Housing

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

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

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

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

Policy 10: Self and Custom Build Housing

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

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

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

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

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

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

Policy 11: Growing Settlements

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

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

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

Policy 12: Accessible and Adaptable Homes

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

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

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

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

In terms of the requirements for "wheelchair liveable" ground floors the following criteria from the [Housing for Varying Needs Guidance](#)

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

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

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

Policy 13: Transport

To receive planning permission, development proposals must be able to demonstrate that walking, wheeling, cycling and public transport are at least as, or more, competitive travel options for people using the development, than travelling by private car. The methodology that applicants must follow to demonstrate compliance with this policy requirement is set out in Appendix X.

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

- a. Clear and measurable targets and objectives to deliver sustainable transport for that development.
- b. What range of measures will be implemented to mitigate the impacts of development that will deliver sustainable transport.
- c. What monitoring and reporting framework will be used to quantify the effectiveness of measures implemented, and when this will take place and be reported to the Council.
- d. How the existing transport context has determined the measures considered most effective to deliver sustainable transport.
- e. What mitigation will be implemented if such measures are found to be ineffective through monitoring, and how these measures will be monitored and reported to the Council.

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

- f. Where an active travel or public transport priority scheme is identified in the Plan, financial contributions towards their delivery will be sought from development proposals within the settlement, or defined catchment, on a per home or floorspace equivalent basis.
- g. Where no specific intervention is required, a standard contribution per house or floorspace equivalent will be sought towards improving active travel and public transport infrastructure in the settlement or catchment area.