

SUBMISSION FROM ALISON LOWE

I would be obliged if you would put my submission before all three committees should this be appropriate as I understand that each committee is dealing with separate parts of NPF2.

My submission is as follows:

I am member of the Action for Planning Transparency group, but wish to also make a separate individual submission to the committees on the following points.

The proposed inclusion of the A96 Corridor in the NPF gives me cause for great concern, and in particular the inclusion of Tornagrain New Town. From the outset, consultation at stage one of the A96 corridor framework was poor, particularly with the Community, and the results of this consultation were flawed and unsound. Tornagrain was put into the A96 Framework proposal due to the results of the Stage one consultation having been misrepresented to councillors at that time. Evidence can be provided to support this statement.

The A96 Corridor Framework as it stands at present is not in the current Local plan. The Highland Council is at present progressing the new Local Development plan. To include the A96 framework in its present form in the NPF would deny all communities concerned the right to a proper process on this aspect of the new Local Development Plan.

As John Swinney said in September 2007 “Early and broadly based discussion with local communities and other parties, including business, on the future direction of change in their area is a fundamental part of the reformed planning system. We remain committed to that. Our expectation is that debate will be held and decisions made in development plans, not through objections to individual planning applications”

Whilst I support the principle of forward planning, it could be perceived that a short cut is potentially being taken in the planning process in the case of the A96 Corridor. The A96 Corridor should therefore not be included in the NPF in its present detailed form, although could be considered in a broad spatial sense.

Sustainable Development.

I would respectfully remind members of the Committee of the statement on sustainability in the NPF2 document at present before them. “Sustainable development is development which meets the needs of the present without compromising the ability of future generations to meet their needs.”

Within NPF2 as it stands at present, ‘sustainable development’ is concerned with future development e.g. para 77. There is little or no provision within this section for the need for Scotland as a whole to retain good agricultural land to enable

ourselves and future generations to grow food for ourselves and therefore be sustainable. This is very short-sighted view in the planning framework, especially given that the government seems to be encouraging us to buy and grow locally. Agriculture and the ability to produce food locally is vital to any concept of sustainable development.

To illustrate this point-

In February 1973 The Highland and Islands Development Board produced a study "Moray Firth – an agricultural survey" - an extension of the study by the Jack Holmes group which was commissioned the HIDB to assess the capacity of the Moray Firth area for an increased population.

It is quoted as being – "an assessment of the economic and social importance of agriculture to the region..... among other things, it is a guide to developers and planners on how they can integrate agricultural and industrial development"

In the conclusions of the Jack Holmes report it states: "with the value of good land (class 1 and 2) increasing relatively and absolutely, any decision to release areas of such land for non-agricultural purposes must be taken with extreme care" This was in 1973. Since then a great deal of development has taken place throughout the whole of Scotland and a great deal of good land has been 'soil sealed'. The statement above made in the Jack Holmes report must surely be even more pertinent at this present time.

With particular reference to the proposed A96 Corridor developments I would point out "that the acreage of arable land" in the above study "amounts to more than one third of the total arable land in the counties of Caithness, Ross and Cromarty and Inverness-shire." The A96 Corridor Framework proposal would remove a great deal of this productive land for future generations. The Jack Holmes report recommended development around Invergordon and on the Black Isle where less viable agricultural land would be used for development. It seems that in 1973 sustainable development was considered before the term 'sustainable' was in vogue.

Also to be considered in the sense of sustainability is the question of provision of infrastructure. For example, in the case of the proposed new town of Tornagrain, which as yet still has to apply for planning permission, no firm and viable proposal for the supply of water to this development has as yet been confirmed. Utilising water from Loch Ness which is 12 miles or more away has been mentioned but as yet I believe it is pure speculation.

Given that at the very least

1. a new purification plant would require to be built,
2. the level of the loch very likely would lower with continued abstraction
3. therefore make the Caledonian canal unusable

I question whether this could be considered to be 'sustainable' and yet the concept of Tornagrain has been heralded as a sustainable development.

Consultation on NPF2

I feel that the level of consultation has been very poor given that this is of National importance. It was only by chance that I heard of NPF at all and more recently would not have been aware of the opportunity to give evidence to the committees , had I not been told by a friend. As members of the public we are unaware that we are required to check up on the internet each day virtually to keep up to date with what is happening in Scottish Government, far less be aware of any consultations which the government expects us to comment on and be involved in.

Alison Lowe