

SUBMISSION FROM MRS E HOLLAND

In submitting comments on the proposed NPF2, I should state that, as a member of Apt, I am in agreement with their submission but have two points which I would particularly like to make further comment on as I feel earlier submissions on these points have been given insufficient weight in proposed NPF2. These are:

(1) Consideration of effects of development proposals generally and on the lifestyles of local communities - which you may consider falls within your term of 'spatial perspective'. (Para 183)

(2) Consultation with the general public

(1) Consideration of effects of development proposals

As NPF1 states, in Scotland only 6% of land is of good arable quality. Yet the value and scarcity of agricultural land appears to be secondary to the prime goal of development which, regardless of the merits or demerits of individual schemes, is taken to be "a good thing". In the Highland Unitary Authority the percentage is approximately half the national average (Macaulay Institute 2008 figures for Highland Unitary Authority - Cl.1, 0%; Cl.2, 0.31%; Cl.3.1, 0.71%; Cl.3.2, 2.2% = 3.22%) This small percentage is chiefly located in the area of the Black Isle and western end of the Moray Firth coastal plain. Yet it is in this small but important agricultural area that planners propose, by way of the A96 Development Framework, to impose a fourfold population increase with - principally on greenfield sites - high density housing development, industrial estates, airport development, university campus and extensive supporting infrastructure, including major road development.

Such a proposal can only result in the de-stabilising and fragmentation of the present thriving rural economy which has adapted successfully over the years to changing economic conditions while retaining its own strong cultural aspects. Organic crops are forming an increasingly important part of the local economy and greater use of locally grown produce is in line with government policy. There has been widespread adaptation to greatly increased tourism with many farms incorporating tourist accommodation. The attractiveness and variety of the hinterland plays a vital part in this successful change.

Environmental concerns also appear to have been overlooked. No attention has been given to the effect of rising sea levels (estimates range between 3cm - 90 cm) on low-lying land already susceptible to flooding. No thought has been given to the inevitable effects of soil-sealing. There is disregard for the history of previous failed attempts to establish incoming large industrial concerns in Highland. The most recent arrival, Lifescan, has already reduced its workforce.

No information has been made available about prospective users of proposed industrial parks, and existing parks in the vicinity have over-capacity.

There are spread throughout the area many interactive small enterprises reliant upon their agricultural hinterland and on the present tourist trade, which would not be sustainable were development to proceed as proposed. No recognition has been given to the loss of livelihood which would result in this sector.

Norbord is one of the largest local employers and is opposed to housing development on its eastern side. Its plant was carefully sited in light of prevailing weather patterns and environmental considerations and it maintains excellent relations with local communities

(2) Consultation with the general public

In September 2007 John Swinney cited "early and broadly based discussion with local communities" as a "fundamental part of the reformed planning system." It seems in my experience to have got off to rather a poor start. Far too much reliance has been placed on the internet as a means of dissemination of information, with the assumption apparently being made that the onus is on the general public to surf the internet to search for something whose very existence maybe unknown to them. Greater use needs to be made of local press, local radio stations and national television. These tend to be more available to groups already difficult to reach than the internet. Regional councils, in co-operation with national government, could also put out a brief leaflet when sending out their annual rates information.

The only reason why the present A96 framework document has got as far as it has is because consultation at local level has been appallingly bad and, where it has taken place, local views have been ignored or misrepresented. There is voluminous documentation to support this statement and this could certainly be provided to the Scottish Parliament.

If I could give a personal example, I am one of many thousands in Scotland who are partially sighted and, without the industrious activities of our APT Secretary on the internet, would have been unaware of the NPF proposals. When I applied to attend the NPF1 day conference in Inverness I mentioned my disability and was assured that large print documents would be provided for me. On arrival I was told "Sorry, we forgot about it till we were on the train" and spent a frustrating and exhausting day trying to use hearing and memory to take in a massive and complex amount of information. This certainly adversely affected my input on the day .

Mrs E M C Holland