

SUBMISSION FROM PAUL JENKINS

I am grateful for the opportunity to comment on the Proposed NPF2 document that is presently being considered by the 3 Parliamentary Committees. My comments have general application to the Proposed NPF2 document, but have particular application to the Highlands, because that is where I live.

I cross-refer my comments to the Proposed NPF2 document by using the headings and paragraph numbers used in that proposed document. I am submitting these comments to all 3 Committees because of the inevitable cross-over of the subject matter, but they will have most application to the Local Government and Communities Committee.

General Comment

Paragraph 212 of the Proposed NPF2 document causes great concern locally, particularly as it is clear that inclusion of development proposals in NPF2 will allow the Highland Council to override existing Local Plans, and so short-circuit the normal planning processes:

The A96 corridor between Inverness and Nairn is the main focus of growth in the Inner Moray Firth. Highland Council's A96 Corridor Development Framework includes proposals designed to accommodate an additional 30,000 people in the area over 35 years. These include the creation of a new settlement at Tornagrain, significant expansion at Nairn and to the East of Inverness, a residential and marina development at Whiteness. Development on this scale will require substantial investment in transport and water and drainage infrastructure and the creation of supporting green infrastructure. The STPR has identified the need to dual the A96 between Inverness and Nairn and provide a new rail station, airport interchange and park-and-ride facilities at Dalcross. It has also identified a package of improvements to the Aberdeen - Inverness rail line which would reduce journey times between the two cities by 20 minutes and improve the connectivity of communities along the route.

As I explain below, my main concern is that the A96 Corridor Framework is entirely founded on forecast population growth of 30,000 in the Inverness – Nairn corridor over the next 30 years, and that this forecast is unsubstantiated, and utterly unrealistic. This being the case, the developments envisaged in the Corridor Framework are also unrealistic and unnecessary.

Population Growth

There is a general presumption throughout the Proposed NPF2 document, and for the Highlands, that population growth is both desirable, and 'a good thing'. This presumption is open to challenge. More people in a particular area means more pressure on services; on educational facilities; on health facilities; on infrastructure; on natural resources of all kinds. Conversely, fewer people in an area (within sensible limits) allows existing provisions to be utilised more fully and effectively, and sustainably.

The Committees are asked to differentiate between projected population growth and aspirational growth. Each area has taken the GROS projections and added significant

aspirational growth on a false thesis that such growth would be beneficial. In the case of the Highlands, this aspirational growth has been taken to unattainable levels, which, as explained below, is dangerous for our local area.

Planning for the sort of modest population growth that emerges from the GROS projections is sensible. The Proposed NPF2 document points out at Para 34 (correctly) that population projections based on past trends are indicative rather than predictive. A structure plan review by the adjoining Moray Council puts it nicely:

The GROS population projections should be used with considerable caution as they are trend based and heavily influenced by assumptions of future migration trends which are inherently uncertain.

Nevertheless, it is important to be as realistic as possible in adding aspirational growth figures, because the mere act of adding a guessed figure opens opportunities for developers to propose major new towns and housing schemes, all of which are based on a false premise. These proposals then take on a self-fulfilling (and circular) justification that they are based upon the need as expressed in NPF2, which need has been based on unsubstantiated population growth projections founded only on national ambitions to grow the population. (Nothing is said about where the jobs are to come from that will sustain these increased populations, and no coherent link is established between population growth and economic wellbeing). If the growth projections had been more realistic, more sustainable, then the justification for these new developments would never have arisen.

I am not against realistic population growth. I am not against development per se. All that I ask is that growth projections and development plans are as realistic as possible, and that fanciful, over-ambitious, projections are completely stripped out of NPF2. If this is done, I shall be happy to support NPF2 as the way ahead for our area.

Specific Comments on the Proposed NPF2 Document

PEOPLE AND HOUSEHOLDS

Para 30. The Committees will note that the population growth figures for Scotland that GROS are now projecting are modest, 5.37M representing an increase of just 4.5% from the present 5.14M over the 24 years, or an annual rate of just 0.2%. This provides an important context for the projections being used in the Highlands, and particularly for the Inverness City Vision (which encompasses the A96 Corridor development plans), which uses 100% and 2.6% respectively. This illustrates unequivocally how utterly unrealistic the aspirational figures being used by the Highland Council are.

The Committees will be well aware of the influence on the growth figures on the assumptions made on in-migration to a sub-national area, and that the trend for in-migration from Eastern Europe is reversing.

Para 31. I would argue that providing for the ageing population in the Highlands is more important than developing to meet ill-founded and unrealistic population growth targets.

Para 32. It is important that the Committees recognise that much of the population growth in the parts of the Highlands and Islands highlighted in this paragraph arise

because of in-migration from other parts of the sub-region, which are being depopulated. The present plans of the Highland Council will exacerbate this trend, and particularly their focus on developing the A96 corridor between Inverness and Nairn.

Such remaining in-migration that occurs from outwith the Highlands tends to be by professional and retired classes, who further increase the challenges of an ageing population. The Committees will note that there is no known or realistically projected surge of economic activity in the Highlands that will support more working families, and hence a higher population.

It is also important that the population growth in the other sub-regions mentioned is not over-emphasised. In Skye and Wester Ross, for example, the percentage growth of 1.4% quoted by Highlands & Islands Enterprise (HIE) seems high, but in practice represents only 246 people. Indeed, the rate of growth peaked in 2005, and the rate of growth of Skye's population is now decreasing again. The Committees are asked to screen out such rose-tinted presentation of data.

Para 34. This paragraph states boldly that the Government's aspirations and targets for population growth exceed projections from past trends. Once again, I would argue that these aspirational additions must be realistic. Also, as stated above, merely adding hoped-for growth figures must not allow developers and local authorities to justify new towns and other housing developments when there will not be the economic drivers to support the families that it is envisaged will live in them.

It would be far more realistic to set targets in terms of economic growth alone. If the jobs are created the population will follow, and the demand for additional housing and infrastructure provision can then be addressed. To focus on population growth as the economic driver is to put the cart well before the horse.

A GROWING ECONOMY

Para 44. In this paragraph the first bullet point makes precisely the point that I raise above – the GDP growth rate must be the driver, not increasing the population.

Sustainable Growth

Para 57. Local communities argue that there is not a strategic concentration of business activity and clusters of related industries in the Inner Moray Firth. Yes, the population of Inverness and its environs has increased substantially over the last ten years, in the ways described above. However, there has not been a significant increase in economic activity other than that arising from displacement from the outlying Highland sub-regions. At a recent planning conference in Edinburgh the assertion that Inverness was the fastest growing economy in Scotland was challenged. It was not, said the challenger, it was, in fact: "the fastest growing housing estate in Scotland".

Where, realistically, is the industry and commerce to come from to support the Highland Council's aspirations for the area? Some may come from knowledge-based activities, but there is no unique feature of the Highlands that mitigates in favour of this location rather than the Central Belt. Indeed, the poor communications infrastructure between the Highlands and the rest of Scotland, taken with the extra distances to be travelled, indicate that there will be a negative pressure. There is no heavy industry, nor the

prospect of any. Service industries will be adversely affected along with the rest of Scotland by the economic downturn.

The fact is that "the strategic concentration of business activity and clusters of related industries in the Inner Moray Firth" is a figment of the over-developed imaginations of local planners and development agencies. In local terms, within the Highlands region, a case can be argued, but certainly not on the scale that is expressed in the Inverness City Vision and the A96 Corridor Development Framework. In national terms, such an overblown projection does not hold water.

I recommend that the Committees remove the Inverness to Nairn Corridor from the list of key locations in this paragraph.

SPATIAL PERSPECTIVES

Para 183. This paragraph notes that the Highlands and Islands have unique environmental and cultural resources offering very substantial opportunities for sustainable growth. I would not argue against this proposition, except to say that whatever development is planned should not serve to destroy those advantages. This would likely be so in the case of the Highland Council's Inverness - Nairn Corridor development proposals.

Para 184. As explained above, major change is not taking place in the Inverness – Nairn Corridor. There is no "scale and complexity of issues" that cannot be addressed by local planning processes and methodologies. There is no need for co-ordinated action in the national interest for this "key location".

The development of the Inverness – Nairn Corridor is a local matter that should be dealt with locally, without the imprimatur and emphasis implied by inclusion in the final NPF2 document. Once again, I recommend that the Committees remove the Inverness to Nairn Corridor from the list of key locations.

HIGHLANDS AND ISLANDS

Para 209. The Committees will be aware that the operating region of HIE is significantly wider than that of the Highlands alone. It includes the Argyle and Bute area, Moray, and the various outer isles, and so any population growth projections must be considered in this overall context, and not misapplied to the Highlands alone.

Nevertheless, when HIE's projection of 15% population growth is compared with the GROS projection for Scotland of 4.5%, it can be seen clearly that the HIE figure is mostly aspirational. Indeed, given the remote nature of most of the area that HIE covers, and the historic low levels of economic activity over their area as a whole, then one might uncharitably conclude that HIE is living in an aspirational dream world.

HIE considers that half a million is a realistic population target for the Highlands and Islands. I recommend that the Committees reject this proposition as essentially worthy, but in practice unrealistic, and unrealisable. Any development proposals that found on this unsustainable population growth figure should therefore also be rejected.

Para 210. Far from the Inverness City Vision playing an important role in guiding future development, in fact it is an unsound document on which to take local development plans forward. It is hugely and unrealistically aspirational, and seems founded on a curious desire to mould the social and cultural behaviour of the local population in ways that are felt to be desirable. Who can take seriously a document that describes the utopian future Inverness as "*a comely place*"?

It is impossible to find hard economic and demographic justification for the wish list of aspirations in this discredited Inverness City Vision document. **I recommend that all reference to the Inverness City Vision is removed from NPF2.**

Para 212. The A96 corridor between Inverness and Nairn is only the main focus of growth in the Inner Moray Firth because local authority planners and local landowners have sought to make it so. Little or no attention has been given in the Highland Council's development plans to the needs of the more remote Highland communities, nor to the growth opportunities in other nearby areas, such as the Beaulieu Firth area and Easter Ross. This narrow focus on the A96 corridor is entirely generated by vested interests, and has no justifiable foundation in terms of community wellbeing, or in terms of sustainability. (Incidentally, consultation with the local communities has been distinctly sub-standard).

The principal and major flaw in the A96 Corridor Development Framework proposals lies in the expressed need to accommodate population growth of 30,000 people over the next 30 years (*not the 35 years stated in the NPF2 paragraph*).

Local community groups have frequently challenged these population growth forecasts that are being used as justification for this development framework. The figures simply do not add up.

There is a range of projections for what the growth will actually be over the next 30 years. GROS forecast a local growth rate of 0.4% per annum, and even the most optimistic, aspirational, local projections only forecast a rate of 0.5%. These two rates forecast population growths of 7,500 people and 11,400 people respectively over the 30 years, both way below the 30,000 figure used in the A96 corridor proposal. To achieve that very high number would require a year-on-year growth rate of 1.5%, a figure that is not credible. (*To further emphasise the point, the local growth rate over the last 10 years has been just 0.3% per year*).

The point that has to be made is that if the 30,000 figure is so very wrong, then the whole A96 Corridor development proposal has been founded on a false premise. The NPF2 paragraph reflects that such growth as is proposed would require substantial investment in transport and water and drainage infrastructure, and the creation of supporting green infrastructure. So it would, but once again, given that the population growth figures are unrealistic, there is actually no need for such infrastructure investment.

By the same token, there is also no need for a new settlement at Tornagrain. Indeed, it is inappropriate at this early stage to identify Tornagrain as the site of such a new settlement, because there are other solutions that might be considered preferable. To have a proposal for a specific new settlement at Tornagrain in NPF2 promotes it improperly to a status it does not have in the Structure Plan. The inference is then that there is pressure for any new Local Plan to include Tornagrain contrary to statutory

development plan process; thus the right of participation in the preparation of the Local Development Plan will have been improperly removed from the communities. **I recommend that all reference to Tornagrain is removed from NPF2.**

Indeed, I recommend strongly that the Committees excise all references to the Highland Council's A96 Corridor Development Framework from the NPF2. The Corridor Development Framework is a discredited document, and no basis on which to forward plan. It is unfortunately the case that even the inclusion of the Corridor Framework in the draft NPF2 document has been enough for local landowners and the local authority to justify unnecessary and major development proposals. Removing it from the final NPF2 document will reverse this unwanted trend.

CONCLUSION

There are other concerns about the Highland Council's development proposals for the A96 Corridor between Inverness and Nairn that range from the economic to the environmental. However, in this submission I have focused on the unrealistic population growth projections that the Highland Council have used to promote their plans. On this basis alone I make my main recommendation:

- **That all reference to the A96 Corridor between Inverness and Nairn is removed from NPF2.**

I commend this and my other recommendations to the Committees.

Paul Jenkins
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