

# Strathpeffer Community Council

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Inner Moray Firth Development Plan Team  
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27 April 2021

Dear Sirs,

## **RESPONSE TO CONSULTATION ON INNER MORAY FIRTH DEVELOPMENT PLAN (IMFDP) 2021 FROM STRATHPEFFER AND DISTRICT COMMUNITY COUNCIL**

I write on behalf of Strathpeffer and District Community Council (CC) to set out our views and expectations from the Inner Moray Firth Development Plan 2021. The CC has taken some time to gather views from around the community on the proposals within your plan and has deliberated on the issues it poses. We also had a very useful meeting with your Tim Stott and Julie-Ann Bain. There are a number of issues about which the CC feels very strongly and these have been set out in this letter. The CC will expect the Council to take cognisance of these points when preparing the next draft of the Plan.

### **1. Strathpeffer**

The village of Strathpeffer is unique. It is a wonderful place to live. It is set in a beautiful valley with some quite stunning views and heritage in the form of the Victorian architecture. It is essential that we protect that heritage and do not allow it to be further undermined through modern housing development that does not reflect the heritage of the village.

### **2. Recent growth**

In the adopted IMFDP of 2015 it is stated that “only modest expansion is supported in the settlements of Contin and Strathpeffer”. It is also stated in the Council’s Housing Land Requirement Background Paper of 2013 that the West Ross target “which includes the more urban settlement of Strathpeffer” up to 2031 is 290. In recent years, the village has seen significant growth at Ardival Place, Ulladale Crescent and most recently

at Kinellan Drive. The number of houses constructed on these three sites will total 84. This has clearly made a significant contribution to the West Ross target. Based on an average housing occupancy of 2.5 this equates to a growth in population of 210. In a community of around 1500 this means a 14% increase. In the opinion of the CC that is **not** considered “modest”.

It is extremely important that any future development is sized appropriately given the unique nature and heritage of the village.

**In our consultations with residents, there is a very clear demand that no more large housing developments should take place within the village during the life of the new plan. For the avoidance of doubt we would classify any development involving more than six houses to be a large housing development.**

### **3. Demand for housing in Strathpeffer**

The CC understands that the Council has an obligation to seek out and make available, land which can be used to meet the demand for housing. Rather than simply ignore this issue, the CC would suggest that this demand can be met in a number of ways. In the paragraphs below where we discuss the individual sites identified in the draft plan, we also make some suggestions that may go some way to addressing that need.

#### **a) Brownfield sites**

The CC understands that National Planning Framework (NPF) 4 makes various statements about placing greater emphasis on the reuse of existing buildings, enabling the redevelopment of derelict and vacant land, and shifting development away from greenfield sites. The strongly held view of the CC is that the Council should exhaust such locations throughout the Inner Moray Firth area (including any such sites in the village) before considering development on greenfield sites such as those proposed within Strathpeffer.

#### **b) Small Scale development**

Consideration should also be given to finding sites that could be used to construct small scale development throughout the village. Examples such as the upper part of Ulladale Crescent are obvious candidates.

### **4. Sites identified in the Plan**

Now let me turn to the specific sites identified for future housing development within the village.

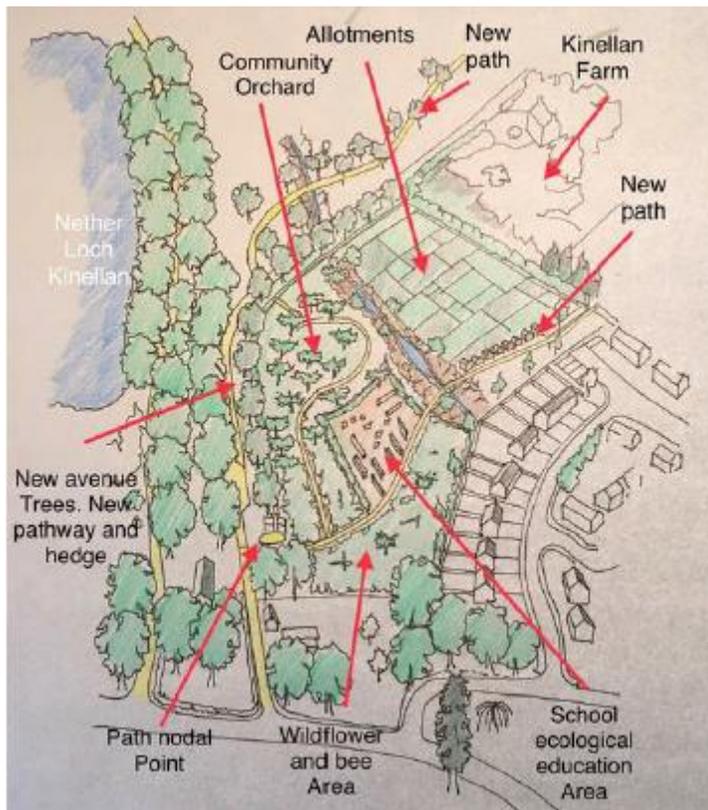
**a) SP01 Site**

The development on this site is nearing completion and therefore no comment is necessary.

**b) SP02 and SP03 Sites**

It is important to consider these two sites together. SP02 is owned by one landowner and SP03 is in two parts with different landowners.

SP02 is a new site which has been added to the Plan. It extends the natural boundary of the village to the West and uses a valuable green space that the CC believes could be put to a more appropriate Community use. Further information on this Community use proposal has already been shared with Tim Stott and Julie-Ann Bain however, an overview of the proposals is given in Plan 1 shown below.



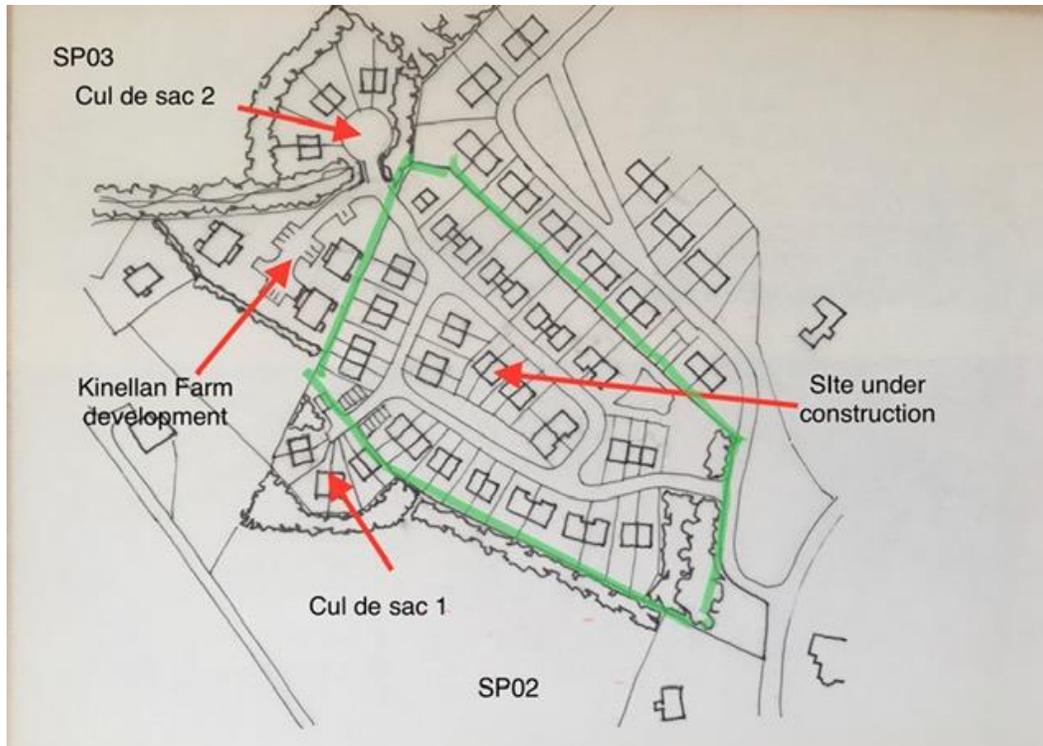
**Plan 1 – Overview of proposed Community use of SP02**

These proposals include the formation of allotments, garden space and community greenspace. The land would also be used to form a public footpath providing pedestrians and cyclists with a safe alternative access to Loch Kinellan, taking people off of the existing single track access road. Additional passing places on this single track access road would also be formed improving public safety.

The CC has received a large number of representations from residents expressing a view that the SP02 site should be rejected in its entirety from the Plan for a number of reasons. These include:

- Very close proximity to a nature reserve that has been created at Nether Kinellan Loch.
- Adverse impact on tourists and walkers travelling to Loch Kinellan.
- Expanding development into greenfield sites is contrary to NPF4 by removing biodiversity and natural spaces and makes the locality less healthy. The area will be less resilient to climate change as it will have considerably more hard standing and impermeable surfaces.
- Further large development which would not fit with or be appropriate to the needs of the village and its heritage.
- There is a very clear alternative Community use planned for this area which would bring a number of significant benefits to the community including safer alternative pedestrian access to Loch Kinellan and additional passing places on the single track access road.
- Ownership of the field would be the subject of a community buy out.
- The site should be classed as Valued Local Green Space.

The CC very strongly supports many of these arguments and the proposals for the use of the land but recognizes that there may be a need for compromise if the Community use proposals are to be delivered. Given the Community has made it clear that they do not wish to see further large housing development within Strathpeffer, we would insist on any future development on **SP02 being limited to six houses**. An example of how the site may be partially developed has been prepared. A proposed site plan showing a cul de sac formed at the north end of the site is shown below in Plan 2. This proposal would allow for some growth in housing while meeting the needs of the Community to preserve the remaining field for Community use. In the time available, it has not been possible to make contact with the landowner to discuss these proposals however, the CC would be willing to open discussions with the landowner on this matter.



**Plan 2 – Proposed layout of limited development in each of SP02 and SP03**

Turning to the SP03 site.

The SP03 site is an amber site and it is understood that the Council do not see it as a preferred site. There are issues with bio diversity and potential flooding. It consists of steep sloping ground which will bring complications and cost to any developer seeking to develop the site. It has been in the Plan for many years and, as has been said above, is under the ownership of two different landowners.

Based on discussions with one of the landowners of the north eastern half, there is clearly a view held by him that it will be developed in part at some point in the future. However there is also a recognition by him that development in the upper parts of the field may be refused on the grounds that it would impact on the skyline and disrupt the overall public view of the village. **Keeping the height of any housing units built below the elevation of the access road that serves the existing houses at Kinloch would be an essential requirement of the CC.** It is also worth re-stating, that there is no desire for any further large housing developments in the village over the life of this Plan.

The owners of the western part of SP03 have submitted a planning application to develop seven units on their part of the site.

To try and find a solution that would meet the demands for housing and those of the two separate landowners, a possible layout has been prepared. This layout is also shown in Plan 2 above. This shows a development of six houses in each of the two parts of SP03.

The CC believes this proposal strikes a fair balance between the demands for future housing while addressing the concerns of the Community.

A concern which has been expressed by many in the Community is that any small scale housing development allowed on any of these sites may in time grow under pressure from the developer. To prevent this, the CC would require the following safeguards:

- Each of these sites would be limited to six houses with the design required to include a cul de sac that effectively closes off access to the fields beyond for any future development.
- The remaining parts of SP02 would be classed as Valued Local Green Space and protected for such use.
- The boundary of both SP02 and SP03 would be redrawn in the Plan to reflect these changes.
- The remaining land in SP03 would be classed as agricultural land.

**If such safeguards were not able to be given by the Council then the CC would insist that no development took place in either SP02 or SP03.**

**c) SP04 site**

It is our understanding that the Council is minded to remove this development from the Plan and we therefore have no further comment on it.

**5. Infrastructure Issues within the village**

Having set out our views and proposals for the different sites in the Plan, it is important to highlight the need for various issues with the infrastructure of the village to be addressed.

- Public transport provision is extremely poor. The most recent housing development in Strathpeffer will increase the demand for improved public transport and any further development will only make the matter worse. Failure to address this issue will place greater reliance on private cars with all

the issues around climate impact that creates.

- Although the official figures shared with us suggest otherwise, the capacity of the primary school is of concern and we believe that further investment in the school will be required.
- Strathpeffer has a history of severe flooding caused in large part by the poor condition of the drainage system. This needs to be addressed as a matter of urgency regardless of any future development.
- The increased volume of vehicles passing through the village requires essential traffic calming measures to be introduced.
- Providing improvements to pavements/footpaths around the village to provide safer routes to school is another essential requirement.

**No further development should proceed until these issues have been addressed or properly financed plans with acceptable timescales have been agreed with the CC.**

## **6. Valued Local Green Spaces**

On this issue, it is important to confirm that the valued local green spaces identified within the 2015 plan continue to be considered as Valued Local Greenspace that should be protected within the Plan.

However, the CC believes there are a number of additions that should be made.

Given the proposals mentioned above, we now believe that the majority of SP02 should be added to the Valued Local Green Spaces. The identified use mentioned above in para. 4 b, confirms that this site provides amenity value, gives people easy access to the natural environment and the opportunity to interact and socialise. It also offers the opportunity to develop community food growing, let people become involved in recreation and it has the added benefit of helping to address climate change. In other words, it meets the criteria set out in Table 4 – Greenspace Assessment Criteria in the IMFDP main issues report.

The CC believes that two other areas should also be classified and protected as Valued Green Spaces. These are the Nether Kinellan Nature Reserve area to the west of SP02 and Loch Kinellan and its immediate surrounding area. Both these areas are of significant importance to the natural environment and in our opinion meet many of the criteria listed on Table 4 – Greenspace Assessment Criteria mentioned above.

## **7. Wider issues**

### **a) Transport Links across the area**

The Plan sets out a vision that the region should be an exemplar of sustainable transport, served by an efficient multi-modal transport network where the potential for shifting to sustainable travel is maximised.

In our view this proposes an ambitious new transport strategy but does not properly address the needs of rural areas while concentrating on and around Inverness.

We agree that the need to travel should be reduced. This has been accentuated by the recent pandemic where people have been required to stay at home and home working has been encouraged. Where journeys are necessary people should be encouraged to walk and cycle, but a lack of safe, convenient well-designed footpaths, shared paths and bike lanes does not inspire this form of travel. For longer journeys the logical choice for travel should be public transport but Strathpeffer and other outlying neighbouring areas do not have the services to meet these needs. Better bus services from across the area to Inverness to link with vital destinations e.g. Raigmore, retail parks, leisure centres, etc. should be introduced. Curtailing bus services, the lack of convenient public transport, lack of bike lanes and cycle paths for commuting do not encourage a move from cars to public transport

A transition to the use of electric vehicles for longer journeys is supported but a lack of public charging infrastructure needs to be addressed across the Plan area to support rural communities and others by providing a network of charging points to support travel by electric vehicles and to do so more sustainably.

#### **b) Hinterland**

Strathpeffer and District ward is now part of Wester Ross and we take the view that the boundary of the hinterland should be adjusted to exclude this area which like the remainder of Wester Ross has a high crofting interest. Houses in the countryside should be assessed against Policy 36 of the HwLDP.

I trust these comments clarify the very strongly held views and position of the Strathpeffer and District Community Council. If there are any aspects that you would like to discuss or seek clarification over, I would be happy to meet with you.

**Yours sincerely,**

**Ron McAulay**  
**Chair of Strathpeffer Community Council**