

Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	HWLDP-MIR-101
Organisation/Individual:	Nairn West Community Council (Rosemary Young OBE)

Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (<i>Please Specify</i>)	

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	
Inverness and A96	
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	x
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	x
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	
Natural, Built and Cultural Heritage	

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	
Accessibility and Transport	x
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	
Forestry and Woodland	
Minerals	
Open Space and Physical Activity	
Access to the Outdoors	
Comments on Consultation Process (+ve)	x
Comments on Consultation Process (-ve)	

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

Organic growth is preferable. Specific comments relating to Nairn including concern about design, and an adverse change to quality of life. More concentration on regeneration the town centre is preferable.

Emphasised need for A96 bypass to relieve congestion should come before new housing.

General comments re: economy and business – concern over a lack of jobs in Nairn. More emphasis should be given to tourism

Action Sheet Completed by:	GW
Date:	8/12/09



Highland-wide Local Development Plan: Main Issues Report (HWDP-MIR)

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NAIRN WEST COMMUNITY COUNCIL

Formal Response from Nairn West Community Council (NWCC)

In response to the invitation extended by the Highland Council, and following the public meetings held in Nairn on the (HWDP-MIR) we submit the following:

NWCC welcomes the (HWDP-MIR) and wishes to express our thanks to the planning development team for their efforts in communicating in the various forums over the past few weeks. The comments/issues and recommendations made below are expressed in what we hope is a constructive manner.

Within the context of the (HWDP-MIR) our focus is on issues that will impact our community. We believe a plan is essential, and that the plan must reflect the views of the local residents so that it secures their active support.

It is of utmost importance that any plan must:

- Recognise what is attractive about Nairn
- Protect the valuable assets that Nairn already has
- Recognise the importance of the traditional activities based on Tourism, Farming, and the service-sector
- Take account of population demographics in particular our aging society , but also requirements to encourage and retain young adults
- Create and preserve a 'Wow factor', this is likely to be preservation of seaside frontage and the opportunity to create a town park
- The plan must not only focus on the New , it must protect our heritage and enhance and develop the existing town centre
- Strict housing specifications must be developed and must become a condition of development and planning acceptance
- The A96 trunk road By-Pass must be a priority

H.C. PLANNING AND DEVELOPMENT DEPARTMENT		
04 NOV 2009		
NAME	SIGN	DATE
RH		
MM		

1. Population growth

The HwLDP MIR (and the A96 Corridor Plan) base their plans on a growth rate of 16% [see pp31-32]. This is very much higher than in the past.

- We are not convinced that such a dramatic increase is likely, even under the most optimistic economic assumptions; we question where the increase will come from, and what economic activity and employment options will sustain such expansion. We believe that organic growth, rather than large-scale in-migration, is preferable.
- Population expansion and other development should be more equitably dispersed across the region in line with the Highland Council's own mission statement. Is it felt that there is an imbalance of development focus on the A96 Corridor.

Specifically the MIR and the plans foresee a doubling in the size of Nairn (extra 10,000 people) over next 30 years.

- Whilst development is broadly welcomed our feed back from a sample of Nairn residents regard such a rapid and large scale expansion as inappropriate.
- They are very concerned that such a major increase will have an adverse impact on the infrastructure and on the character of Nairn.

2. Housing

The high growth scenario [see p19] implies over 4,600 new houses in Nairn (as well as many more in Inverness, Tornagrain etc), and in higher-density developments.

- We consider that such a large expansion is unacceptable and not in keeping with the existing character and the architectural context of the town
- There is particular concern that high-density housing in the form of high rise 4-storey apartment-blocks (of which the new building at the Maggot/Bridgemill is a current and disturbing example) is out of keeping with the architectural style of the existing residential buildings. There is a concern that more building of this kind will devalue existing housing stock and have a detrimental effect on the overall urban landscape.
- Residents would, therefore, like to see that planning for housing includes strict specifications to maintain architectural quality, preserve green spaces, and ensure high quality design.
- To ensure developments are in character for Nairn, we would like the Highland Council, via the Local plan, to develop a specification on the type and standard of development that will be required to satisfy planning acceptance.

The plan presumes there is a substantial demand for more houses, and more “affordable” housing, in Nairn.

- It is not clear to us that this assumption is correct, nor where this demand might come from.
- There is serious anxiety in Nairn about the possibility that Nairn will become a destination for “overspill” from Inverness or elsewhere and thus turn into little more than a commuter dormitory.
- If significant new large-scale housing developments are built, local residents believe that this will adversely change the quality of life in Nairn, and may destroy the main reason why people might be attracted to live here

3. The town centre

In the section on Nairn [pp18-19], the HwLDP MIR focuses almost exclusively on the designation of substantial areas of land in and around Nairn for housing development. It states that this would “enhance the distinctive role of the town” and “complement efforts to regenerate the town centre”.

- We do not believe that extensive new housing developments on the outskirts and along the main access roads will enhance the town.
- It is not clear to local residents how building housing estates on the edge of town will regenerate the centre. The centre of Nairn has been neglected, declining and derelict for over 20 years. There is no apparent evidence that the previous waves of house building (in Tradespark and Achareidh, and more recently in Lochloy) have made any contribution to the revival of the sites in the town centre.
- It would appear that a significant majority of the residents of the town believe strongly that specific planning measures should be introduced which are aimed at reviving the town centre – and that such action should have higher priority than the construction of more new houses?
- The town centre is of such critical importance to the future of Nairn that we consider that the development plan should set out broad guidelines for other kinds of development in Nairn as well as housing – like retailing, supermarkets and business
- Having a developed and attractive town centre should also be a core element in the new Local Plan. Creating a trading arena that attracts both locals and travellers from a wider catchment area is desirable.
- Careful thought should be given to the location of any “district” shopping zones within new housing developments on the outskirts of Nairn. Both for reasons of access and traffic, and to preserve the viability of the main central shopping area around the High Street, any smaller suburban retail and service areas should be on the outer periphery of the new housing areas.

The Victorian High street area has many properties which are of architectural interest and merit, which deserve conservation and protection. There is no mention of such assets in the HwLDP MIR. They are a part of the town’s heritage and thus of the history of the Highlands.

- The plan should include reference to the need to maintain and protect these areas – and perhaps to re-introduce the earlier proposal to seek conservation-area status for certain unique features and buildings

4. Transport and access

We all know that Nairn is already a serious traffic bottleneck on the A96. The HwLDP recognises the need for a bypass. However, there is no planning provision or timescale. The HwLDP MIR appears to suggest that a great deal of new development should take place in the short-term, before the construction (in the longer-term) of a bypass.

- It is important that the A96 bypass is deemed as a Strategic Trunk road improvement. Its principal function should be to relieve congestion and facilitate main-route journeys along the A96. It is not intended as a service and access road for the new residential zones associated with the development of Nairn. The MC20 route should be favoured and the MC10 route dropped and deleted from the plan as it bisects the proposed riverside park, and crosses flood plain with high associated engineering risks.
- There is doubt about a strategy which proposes building houses first, then thinking about (or hoping for) the upgrading of roads and other services afterwards. Previous experience (e.g. Lochloy) shows that this does not happen.
- For this reason, we believe it would not be right for major housing developments to go ahead before a bypass and other infrastructural improvements are in place.
 - As already recognised by the Council and its planners in the context of the Deveron/Sandown proposal, substantial new housing developments will have significant implications for the existing roads and traffic, and the town does not have the capacity to cope even with present levels? The impact of development to the west of Nairn (i.e. Sandown/Delnies) will have particular adverse impact on traffic flows, road safety, and the quality of the residential areas of Nairn's historic Victorian 'west end'
 - The A96 bypass is crucial to keep the A96 corridor traffic out of the town of Nairn. It is therefore vital that no other interim arrangements, such as an "inner ring road" through the residential areas of south Nairn, should prejudice or delay the delivery of a proper trunk road bypass
 - To ensure developments are in character for Nairn, it is desirable to see the Highland Council Planners, via the Local plan, develop a specification on the type and standard of road and service improvements that new developments that be required to satisfy to gain planning acceptance.
 - It is important that any developer lead local infrastructure improvements works are conducted well in advance of any housing or retail development, it is suggested that it should become a condition of planning implement these improvements asap with retrospective developer contribution as the town evolves

5. Other Infrastructure

Other infrastructure facilities (notably drainage, sewage and water-treatment) are also already over-capacity and under stress. The HwLDP MIR says virtually nothing about planning for future water and waste treatment in Nairn – except to indicate [map p54] two major waste plants in Nairn by 2025!

- The strategic plan should recognise explicitly that further housing development in Nairn can only be considered once the town's infrastructure issues– including notably the water treatment and drainage-capacity problem – have been fully resolved and the services upgraded
- Residents are concerned about the indication in the MIR that new waste-processing plants are to be located in, or next to, Nairn (which is a tourist resort, not an industrial zone....)?

Social, welfare, health and education services are also an important part of the town's infrastructure, and are regarded by the whole community as important. There appears to be a lack of clarity, and a need for more joined up thinking, over the number and location of any new schools as the town expands.

- If new schools within new developments result in the school buildings at Rosebank and Millbank no longer being used, early planning action should be taken to identify alternative uses for these historic buildings; they should not be allowed to decay.

6. The economy, and local business and employment

The HwLDP envisages massive population growth, but says virtually nothing about what kind of economic activity and what sort of jobs all these people will be doing. (There is little point in building lots of houses if there are no sustainable jobs for the people who might think of living in them). There are sections on agriculture and crofting, and references to jobs in Caithness linked to renewable energy – but that's about all. None of this will employ 10,000 more people in Nairn!

- If the Council is planning for economic growth as well as a massive influx of people, the plan should include much more about the kind of economic development the region should pursue?
- As part of a strategy to counteract the trend of commuting to Inverness for employment and thus to reduce the traffic and carbon-footprint, more attention needs to be paid to the scope for the creation of employment and the promotion of small and medium businesses in Nairn itself.
- In this respect, there should be clear regulatory measures to prevent the kind of problem that has arisen at Balmakeith commercial/industrial park,

where land and premises planned and built by the public sector (INE/HIE/Council) have been sold off to private owners who then “land-bank” the premises as assets, thus rendering them inaccessible to other prospective business-users.

- We recommend that the Highland Council consider changing its current centralisation-of-services policy and relocate selected local administrative functions and offices to Nairn (and indeed to other sub regional centres). This would help promote diversity and mixed-use of premises in and around the town centre, and would offer local employment opportunities. The introduction of e-planning, remote working, and other facilities such as video-conferencing would enable the Council to operate more efficiently with a decentralised network of local offices throughout the region. This would have the added advantage of reducing the commuting and congestion that results from the concentration of Council services and offices in Inverness

Nairn in particular depends heavily on tourism. Sensible planning should promote and preserve the key features of the area which attract both visitors and residents.

- As explained in more detail by Visit Nairn, a substantial new programme of housing construction in this area [the “Concrete Coast” scenario] represents a major threat to the attractions of the town as a pleasant recreational environment for visitors and tourists
- Since most visitors come to enjoy the attractive and historic character of the town, and value the views, the open green spaces, the rural setting, and the quality of unspoiled nature that Nairn and its immediate surroundings offer, it will be important that new development does not damage these qualities. (The Maggot development, overlooking the prime asset of the Nairn riverside and now greeting all who are heading for the tourist area of the East beach and the caravan site, or the Dunbar Golf Club, is a classic example of the detrimental consequences of ill-planned development)

7. The environment

The HwLDP refers to safeguarding the natural, built and cultural heritage of the Highland region. But it also indicates a substantial increase in wind farms and wave-energy installations (as well as a lot more houses).

- The protection and enhancement of Nairn’s natural assets and environment (the beach, coastal outlook, riverside and rural hinterland) is of fundamental importance. The regional plan must recognise, support and deliver this.
- Specifically, the designation of a green recreational park area alongside the river (the ‘Nairn Park’) is very welcome. As well as inclusion in the regional plan, this should be incorporated as a priority into the new Local Plan for Nairn as a priority. This town park is likely to prove to be an attractive asset to local residents and visiting tourists.

- The development plans should also include measures to safeguard existing green spaces of Nairn – not just the Links, but also the Riverside (already blighted by the Maggot development,), Viewfield and the Showfield (where current suggestions to incorporate that into the Common Good should be explored positively). There should be a clear veto on any further construction on these remaining green spaces

Conclusion

We believe that the HwLDP MIR is a useful first step in the preparation of the new regional and local development plans. We think it is essential that the views of local residents are fully reflected in the plans which are eventually produced. We have already made considerable efforts to raise local awareness of the planning process. Our comments in this submission draw on the views expressed to us as Community Councillors, and also the discussions at the joint public meeting of all three Nairn Community Councils held on 22 October.

We share the view of the Highland Council that this exercise is of fundamental importance to the region and all who live in it. We are keen to cooperate and consult closely with the Council planners, and remain ready to offer further input as and when this may be appropriate.

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