

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

Reference Number:	HWLDP-MIR-140
Organisation/Individual:	GH Johnston Building Consultants – Mr and Mrs Nicolson

Action:

Immediate Response Required	<input type="checkbox"/>
Meeting required with Respondent	<input type="checkbox"/>
Issue for Area Local Development Plan	<input type="checkbox"/>
Further Information Required	<input type="checkbox"/>
Other (Please Specify)	<input type="checkbox"/>

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		Previously used Land	
NPF2 for Scotland		Wild Land	
Vision for the Highlands		Water Environment	
Inverness and A96		Renewable Energy	
The A96 Corridor		Flooding	
Phasing of Development		Waste Management	
Developer Contributions		Air Quality	
East Inverness		Sustainable Design	
Nairn	x	Business and Industrial Land	
Tornagrain	x	Accessibility and Transport	
Smaller Settlements in A96		Agricultural Land	
Caithness and North Sutherland		Subdivision of Existing Crofts	
Easter Ross and Nigg		Allocation of Inbye Land	
Development of Local Centres		New Crofting Township	
Wider Countryside and Fragile Areas		Small Scale New Crofts	
Population and Housing		Coastal Development	
Housing in the Countryside		Forestry and Woodland	
Affordable Housing		Minerals	
Planning for an Ageing Population		Open Space and Physical Activity	
Gypsies/Travellers		Access to the Outdoors	
Retailing		Comments on Consultation Process (+ve)	
Developer Contributions		Comments on Consultation Process (-ve)	
Natural, Built and Cultural Heritage			

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

Support for sustainable growth of Nairn
 Concerns over impact of growth of Tornagrain on Nairn
 Concern over proposed route of by-pass
 Lack of commitment to forward funding of the A96 by Scottish Government
 Imbalance of growth around Nairn
 Infrastructure should come early

Action Sheet Completed by:	SH
Date:	9/12/09

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Your Ref: HWLDP-MIR Consultation

6 November 2009

Mr Stuart Black
Director of Planning & Development
The Highland Council
Glenurquhart Road
INVERNESS
IV3 5NX

H.C. PLANNING AND DEVELOPMENT SERVICE		
09 NOV 2009		
NAME	INITIALS	DATE
RH		
MM		

Dear Sir

HIGHLAND WIDE LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT A96 CORRIDOR STRATEGY/MASTER PLAN: NAIRN

We refer to your consultation letter dated 28 August 2009 regarding the above and welcome the opportunity to comment.

We now write on behalf of Mr and Mrs Nicolson who own and farm land at Househill Mains, Nairn. As such, they were stakeholders in the preparation of the A96 Corridor Strategy with regard to the Nairn Framework Plan. We have been instructed to follow up this interest on their behalf with regard to the preparation of the Spatial Strategy.

Our clients fully support the principle of identifying additional land for the planned and sustainable growth of Nairn. As in the past, we indicate their willingness to work with the local community, the Council and other agencies to help deliver sustainable development. They are particularly anxious to attract new business to Nairn, as well as to regenerate it as a major tourist resort. However, they fear that efforts to develop Nairn could be hampered by:

- the early development of a new town at Tornagrain from 2011, ahead of expansion of Nairn from 2016;
- the detailed Development Framework, which the Council continues to promote, lacks even distribution of development land and accessibility around the whole town;
- the Council's "preferred" route of the bypass east of the River Nairn;
- the lack of commitment to forward funding of the bypass by the Scottish Government; and
- the unreasonably high level of financial contributions expected of developers, as indicated in the complex and hastily agreed Protocol.

We expressed these concerns and provided more detailed comments in a previous letter dated 1 March 2007. We also had concerns about rushing the consultation on the numerous supporting documents and subsequently through the 14 March 2007 PDET Committee without adequate time for anyone to consider the implications. However, there was no reference to our comments in the officials' report to that Committee and we felt aggrieved that these were largely ignored. Our clients therefore remain concerned that this hastily agreed Strategy continues to be promoted as the option for Nairn through the Main Issues Paper.

Director: Gary H. Johnston

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We therefore feel that this needs to be revisited through both the Highland Wide and Inner Moray Firth Local Development Plans. Failure to address these concerns would see Nairn continuing to languish as a large dormitory town instead of meeting the A96 Corridor Strategy objective for it to become a more rounded community, less dependent on Inverness for jobs and shopping facilities, and avoiding the aggravation of current commuting problems. As such, we ask you to consider the following: -

1. Phasing of Nairn's Expansion and Tornagrain

We previously expressed concerns about the Tornagrain and Whiteness Head proposals receiving favourable consideration prematurely in the absence of infrastructure information. We still have concerns about the commencement of the proposed new town at Tornagrain ahead of the more sustainable development option of a planned expansion of Nairn. In the current economic climate it is unrealistic to promote Tornagrain to commence in 2011 ahead of the development of existing and quite substantial land allocations elsewhere in the Corridor, let alone in the wider Inner Moray Firth area. Infrastructure investment should be more realistically prioritised for expansion of existing communities. We therefore seek deferral of the timescale for development commencing at Tornagrain, at least beyond the more substantial growth of Nairn.

2. Modify the Nairn Framework Plan

This should be considered both in the preparation of the Highland Wide and Inner Moray Firth Local Development Plans. Our clients seek integrated development, but feel that this will not be achieved as the distribution of the land uses as proposed is severely imbalanced. The spread of development gives cause for concern when you look at the relative distance from the centre of the town to the outer reaches of housing land at Nairn South and West.

There are areas of high ground on the east side of the River Nairn that are far more closely related to the town centre. A development that promotes a more even spread of residential development and a greater overall critical mass will help deliver the bypass and broader sustainability objectives in terms of business, industry, commercial, retail and mixed use development. This requires modification of the preferred bypass route to the outer line shown in the Framework Plan and identification of development land in suitable areas east of the river, including at Househill Mains, avoiding flood risk and amenity woodland.

3. Pressing the Government to Commit to Forward Funding the Upgrading of the A96

At a time of economic recession public investment in what is public infrastructure is needed to help stimulate private sector investment. Recognition must also be made of the need to invest in the long overdue upgrading of the. Most of the existing and indeed long-standing traffic congestion in Nairn is caused by through traffic on a strategic national route. It is therefore not appropriate to consider what spare capacity might exist in the road. As a Strategic Project and part of the National Planning Framework there should not be reliance on private sector investment to fund the Nairn bypass and it is certainly not realistic to expect this in the short to medium term. In the absence of a commitment from the Government even to contribute to never mind forward fund the upgrading of the A96 financial institutions are even less likely to lend to developers.

4. Review the A96 Corridor Developer Contributions Protocol

We welcome the intention to do this Highland wide but also feel this should include the hastily 'agreed' A96 Corridor Protocol, which is inconsistent with other guidance produced by the Council. We previously illustrated concerns about the calculation and effect of developer contributions across the whole Corridor and some of the flaws in the assumptions and methodology in this guidance.

With the right development framework and public investment Nairn has an excellent chance of delivering a substantial slice of the business and housing growth proposed for the A96 Corridor over the next three decades. Building on Nairn's strengths and a more even spread of development land allocations around the town is desirable. This combined with existing land allocations in Easter and Mid Ross suggest that a new town at Tornagraim might not be needed for the foreseeable future. The existing towns in the wider Inner Moray Firth area would therefore have a better chance of becoming more rounded communities, less dependent on Inverness for jobs and shopping facilities, and with a reduction in current commuting levels.

Yours faithfully

Alan Ogilvie MRTPI
G.H. Johnston Building Consultants Ltd