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Dear Sir

INNER MORAY FIRTH LOCAL DEVELOPMENT PLAN
JOHN GORDON & SON LTD, SAWMILL, BALBLAIR ROAD, NAIRN

We act on behalf of John Gordon and Son, Sawmill, Balblair Road Nairn. We understand that land allocated in the adopted Local Plan is to be carried forward. Notwithstanding and in view of the Highland-wide Local Development Plan and the planning application (11/00688/FUL and any revisions that derive from it) presently under consideration and their implications for our client's interest, we believe it appropriate and helpful to set out our client's policy objectives for consideration.

Background

This following planning considerations are prerequisite in a sustainable future for the Sawmill, its employment (approximately 100 jobs) and significance - as a strategic economic activity - to the local economy; its contribution to Nairn's role as a service centre and in sustaining Nairn as a successful town. These reflect the priority the Council affords to the Sawmill in the context of the adopted Nairnshire Local Plan and proposals for Nairn South as set out in the Development Plan.

1. 5.1 ha. of land is allocated in the adopted Local Plan for expansion of the Sawmill. This is reaffirmed by the Nairn South allocation of the Highland Wide Local Development Plan. The Sawmill is fully committed to developing all of that land although it does not presently own the land; there are no plans to relocate the Sawmill.
2. A commitment to any first phase development at Nairn South will determine the extent of the Sawmill's expansion prospects for all time by land-locking the site. The business has expanded 4-fold in 40 years and presently occupies 7.0 ha. The land available to it for future expansion could represent as little as 25-30 years growth potential.
3. The Sawmill is a heavy, fully automated industrial plant with bulk buildings, extensive open storage, major traffic generation - up to 50 HGV movements per day into and out of the site (expected to rise to 65 per day) - operational processes and a significant visual presence. The whole operation is one of intense activity that requires separation and screening from neighbouring uses; and that the transport and operational processes of the Sawmill are fully assimilated with any development at Nairn South.

4. The Sawmill has no choice in the direction in which it is able to expand. This must be to the south-west towards future development at Nairn South. Where choice exists is in the location and timing - *the proximity* - of development at Nairn South due to the abundant supply of land for urban expansion out towards the proposed by-pass. There is no justification not to allow the Sawmill sufficient breathing space and room for growth, such that it's potential to cause or experience conflict is minimised as far as is reasonably practicable.
5. The Sawmill has planning permission given in 2007 for the 5.1 ha. of expansion land. There should be no misconception that such approval represents the future use to which that land need be put; and the *impacts* on first phase proposals at Nairn South should not be assumed on this basis. In that regard, very substantial sustainability gains could accrue to Nairn (and Nairn South) eg. from modal shift of freight to rail and bio-mass/alternative energy production from bi-products should such (or other) options become viable in future.
6. The Sawmill must be able to respond to viable market opportunities as these arise and - to remain competitive - to be able to maximise its development potential in the space available to it, unfettered by neighbouring development, as far as is reasonably possible. There can be no absolute commitment at this time in a long-term allocation of land, as to what activities would go where and what their impacts might be.
7. There is no justification whatever to encroach upon the Sawmill, its operational requirements or expansion potential. The Highland wide Local Development Plan makes provision for a buffer as an integral part of development at Nairn South. This must be fully committed and provisions made to establish it with any first phase development at Nairn South.
8. A buffer must give sufficient separation between the Sawmill expansion area and any development at Nairn South. It must be of a form suitable to the industrial processes and the visual effects of the Sawmill; consistent with the Landscape Character Assessment and PAN 1/2011 Planning and Noise. The Sawmill's prospects will be severely jeopardised unless an appropriate buffer - and therefore the limit of encroachment of development - is established and resolved at the outset.

John Gordon & Son remains fully committed to continuing discussions with the Council and other proprietors.

Policy Objectives

Following from these factors, our client's policy objectives are as follows.

Land

1. That the 5.1 ha. of land identified in the adopted Nairnshire Local Plan is allocated for expansion of the Sawmill;

Buffer

2. That provision is made for an adequate and permanent buffer - by suitable form and separation distance, landscaped and planted and consistent with good design and the landscape character - beyond the outer boundary of the Sawmill expansion area. This should be a prerequisite to any development of land at Nairn South; to separate any neighbouring development to the south-west such that the risk of conflict with the operations of the Sawmill is minimised, and to facilitate the opportunity for the company to maximise the development potential of its expansion area - as far as is reasonably possible, unfettered by such considerations; and to provide visual containment for the Sawmill. Given the existing Local Plan, a benchmark for consideration of the width of that buffer should be 45m. Should that distance prove to be insufficient, then it may be appropriate to consider recreational uses also towards any north-east edge of any development at Nairn South.

Transport/Traffic Management

3. That in the context of any development proposals for land at Nairn South, the transport implications of the Sawmill are taken fully into account and assimilated with regard to the layout of development and the circulation network that will serve it; such that there is no impediment to the use of Balblair Road as the principal access to the Sawmill (for HGV) and that its long term aspiration is to connect via this route to any future by-pass is not prejudiced. The option of a link road between Cawdor Road and Balblair Road - although not required for the Sawmill - should not be disregarded prior to the implications for development and transportation being fully assessed, including the potential to achieve significant access improvements to the Sawmill consistent with its expansion; and any possibility that Balblair Road may be stopped-up.

Planning Framework

4. That the Local Development Plan should provide a framework for the delivery of the expansion of the Sawmill and a coherent town expansion based on an understanding of (i) the development potential of the adjoining land and the Sawmill, and the implications for land, transport/traffic management and the provision of a suitable buffer (including the logistics of its formation by any remodelling of ground from adjacent sites); and (ii) the timing of development at Nairn South and the sequence of events that would secure the future of the Sawmill and its expansion, before development at Nairn South is committed.

Thank you for the opportunity to lodge representations. We would be grateful of the Council's consideration of these factors in the course of drawing up the Local Development Plan and look forward to the publication of a Main Issues Report.

Yours faithfully



Colin Mackenzie
G H Johnston Building Consultants Ltd

