

# Highland Council Inner Moray Firth Local Development Plan

## Comments received for the consultation that ended on 13th December 2013 ordered by Site

Customer Number  Name  Organisation

Agent Name and Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

### Comment Changes

### Representation

Allocated to

Customer Number	04051	Name	Mr Charles Phills	Organisation	
Agent Name amd Organisation (if applicable)		Mr John Wright		Strutt and Parker	
Section	4.Development Allocations		Paragraph		
Reference	CM3 Daffodil Field (Cromarty)		Type	Change	Comment Late
				No	

Comment Changes

Remove the allocation of this land for allotments but retain the site within the settlement boundary.

Representation

This site was identified in the Ross & Cromarty East Local Plan as a housing site for up to 4 houses. Whilst this was not subject to a planning application during the lifetime of that plan, we did make a submission to the “call for sites” seeking the continuation of this allocation to the new plan for delivery within that period. Our reference number for the call for sites was RCE3. The Officers Committee draft of the Main Issues Report identified this site as H1 being a preferred housing site, providing an opportunity to round off the settlement and infill a logical gap. Unfortunately, when Councillors considered the draft Main Issues Report the preferred status was removed and replaced with a non-preferred status for housing, but retaining the land within the settlement boundary. There was no mention at that stage of considering this site as a potential allotment site. Whilst it was unfortunate to see the removal of the preferred status of the site we were comforted by the continuation of its inclusion of the settlement boundary and, on that basis, did not make a representation to the Main Issues Report. When the “additional sites consultation” was undertaken, we reviewed that document and noted no change in respect of land at Daffodil Field. In particular, there was no mention of any indication that this site was being considered as a potential allotment site and therefore no submission was made to this consultation. Whilst the landowner has previously considered an approach about the possibility of providing allotments on this land outwith the development plan process, this was declined. It therefore came as some surprise when reviewing the Proposed Plan to see this site identified as an allotment site. This is the first time this site has been identified in the plan, or discussed as part of the process as having potential, for allotments and has therefore not been subject to the necessary publicity, or consultation, that an allocation in the Proposed Plan should benefit from. The landowner intends to develop a small number of houses on this site, which does not require an allocation, but does require the land to be within the settlement boundary. No technical issue has been raised during the LDP process that would prevent development, or cannot be overcome in the detailed design. As a result, the allocation of this land for allotment uses is not effective, would be constrained by landownership, and should be removed from the plan (but retained in the settlement boundary) to avoid unnecessarily raising expectations with the Allotments Association/Growers Group. If there is a need for allotments, and provision needs to be identified in the LDP, then discussion should be held with relevant landowner to identify a location that is likely to be released for such a use during the Plan period.

Allocated to	Cromarty	CM3	Daffodils Field	
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Customer Number	04019	Name	Julie Price	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.141 - re CM3 (Daffodils Field)	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Do not include this area in the development plan.

#### Representation

In addition to my previous comments, I failed to point out that the proposal for Cromarty also includes CM2 at the other end of town which is considered suitable for allotments. As there are already allotments at the eastern end of town, it makes more sense and is much fairer to spread the amenity to the western end so that those living there can enjoy such a facility closer to their properties. It does not make sense to condense these facilities in one area of the town.

Allocated to	Cromarty	CM3	Daffodils Field	
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Customer Number	04022	Name	Alison Hill	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference			Type	Change	Comment Late
				No	

Comment Changes

Removal of house and garden at Burnside Cottage, Miller Road Cromarty IV11 8XH from proposed allotment development.

#### Representation

The area highlighted in area CM2 on the plan sent to me in your letter IMFLDP/PP/NN as being proposed for allotments includes my house and garden. This area is clearly defined on the plan as separate from the 'Daffodils (sic) Field' yet has been included. I am seeking an early written assurance from you that my property is NOT being proposed for inclusion in this development and hold the Council entirely liable for any costs incurred on my part in correcting this distressing and careless error.

Allocated to	Cromarty	CM3	Daffodils Field	
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Customer Number	04019	Name	Julie Price	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.141 - re CM3 (Daffodils Field)	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Do not include this area in the development plan at all.

Representation

I refer to the above proposal and would like to comment as follows: The old tennis courts to the east of our property have recently been developed as allotments and this seems to be perfectly adequate for the demand in the town. We have a good relationship with the local allotments society and are happy and supportive of the tennis courts allotments. I cannot see that an area of this size will be required for further allotments as I do not believe there is the demand locally for more. It is a lovely amenity in the spring for people when the daffodils grow. Since we have been here, there have been applications for growth at Nigg, the walled garden in Miller Road and now this suggestion. It would be nice to preserve our privacy which is why we bought the property in the first place and have lost some of this already with one lot of allotments, so another would be to our detriment as both sides of our property would be affected and taken over to this kind of use. I would not like to see the character and peace of Miller Road changed further - which is why we chose this house over others.

Allocated to	Cromarty	CM3	Daffodils Field	
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Customer Number	03953	Name	Alexander Thomson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	CM3 - Daffodils Field, Cromarty		Type	Change	Comment Late
				No	

Comment Changes

While not opposed to the allocation of this site for allotments, it is important that any potential allotment provider (presumably CAGS) provides for public access to the shore side of the field (north) as this could then become a significant community asset, with e.g. seating provided by the Community Council on a grassed area.

Representation

Cromarty Community Council some 10 or 12 years ago made contact with the owner of the site with a view to persuading him to make the land over to a local trust so that the field could be tidied up and turned into a community asset with bench seating at the shore. This attempt was unsuccessful, but the community interest in the site continues, and it should not become out of bounds to non-allotment holders.

Allocated to	Cromarty	CM3	Daffodils Field	
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Customer Number	01719	Name	Mr Evan Mcbean	Organisation	
Agent Name amd Organisation (if applicable)		Mr Fraser Stewart		Fraser Stewart Architects	
Section	4.Development Allocations		Paragraph	4.139, 4.140	
Reference	CM1, P134 settlement plan		Type	Change	Comment Late No

Comment Changes

We wish to see the inclusion of land zoned for self build housing to the west of the manse, previously referred to as Site H4 and site C6 in the Alternative sites plan and earlier IMFLDP plan iterations We wish to see the settlement boundary changed to reflect the true nature of Cromarty from that shown on page 134,as: a) it is not a true representation of the settlement b) this change has not been put forward in any earlier consultations and plan iterations

Representation

Cromarty / Settlement boundary/ Inclusion of sites H4/C6 Response to Inner Moray Firth Proposed Local Development Plan. December 2013 1.The boundary as shown on the current proposed plan( P134) has been changed out of all recognition from the previous local plan settlement boundary. 2.There is NO explanation anywhere in the documentation as to why this is being proposed. 3.The redrawn boundary if correct will greatly affect the prospects for the future economic vitality of this Historic town, as there is only limited available vacant space within the town for future growth. 4.We note that much of the built form above the escarpment has been taken out of the boundary shown on the proposed plan.(p134) There is no written reference to, or justification of this potential significant change in the proposed plan. 5.Urquhart Court in the current proposed plan document is now shown isolated in relation to the rest of Cromarty. This proposed plan change gives a totally FALSE impression of the settlement boundary. The settlement boundary already has a clear rational and includes the built forms of the Manse, Rosenberg, Greenwood and Urquhart Court within the boundary, as well as to the east; the Gaelic chapel /cemetery etc. 6. Urquhart Court as a lozenge shaped island on the partially wooded escarpment is inconsistent and alien to the previous settlement boundary. 7.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding off” the currently approved boundary provides an easy win as a future proof rational for future growth within Cromarty. 8.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding” off the currently approved boundary was supported under the Alternative Sites and Uses consultation put forward in summer 2013 by Highland Council IMFLDP planning and development team 9.If the town/settlement boundary is being amended as per the proposed plan (see items 1-8) our proposal for inclusion of sites H4/C6 to the west of the manse will be greatly disadvantaged, and if the proposed boundary change is approved it will adversely affect potential future growth. 10.The current proposed plan for Cromarty as published makes NO allowance for sites to be developed for self build purposes. The Sandilands site is not suitable for self-build, it is a town centre site where higher densities are expected and encouraged (i.e. no detached self build units) and is a developer led site. 11.The Sandilands site may accommodate 33 dwellings (mix not known), but all recent housing needs surveys suggest in excess of this is required, which is why sites H4/C6 should be included in the new IMFLDP to make provision for increased numbers. 12.Many of the sites identified for housing within the town have all been found to have had constraints in bringing them forward, which is yet another reason why site H4/C6 should be included in the new plan, as there are no issues holding back their zoning for self build plots. 13.There is a well-established self-build tradition in the Highlands and the Black Isle in particular for self build plots. While other settlements in the Black Isle make provision for housing (some of which could be self build) it is NOT reflected anywhere in the Cromarty proposed plan. This puts Cromarty at a great economic DISADVANTAGE compared with other Black Isle settlements. 14.The Sandilands developer offer, while it may offer a range of tenures and different unit types DOES NOT make provision for small self build plots which provide the route and stepping stone for many couples / families onto the property market. Where the conventional mortgage/owner occupier/ shared equity route is not an option, for these couples and families by providing the “sweat equity” into their new self build homes it makes the reality and prospect of a new home both achievable and affordable. 15.For Cromarty to thrive and prosper over the foreseeable future it requires a diverse offer in the future housing market. Our proposed sites H4/C6 to the west of the manse are a distinct offer which is different from, but can work along side the developer offer at Sandilands. 16.Cromarty’s distinctive character would not be adversely affected by the inclusion of sites H4/C6. Cromarty’s character is achieved via a combination of many elements; including a rich townscape, a fine grained fisher town, handsome former merchants house, more recent housing, civic buildings, historic buildings and landscapes, churches, ruins, harbour, wooded landscape and surrounding environs including the farmland up to the boundary. The addition of a further character area in sites H4/C6 to those already above the escarpment only adds to the diversity of the built and natural environment on offer in Cromarty as it seeks to secures its future in the 21st century. By careful and considered design (as illustrated in our supporting Vision document) sites H4/C6 can become yet another character area which contributes & enhances the uniqueness of Cromarty. 17.Our vision statement for sites H4/C6 gives a flavour of how any visual impact can be mitigated. It seeks to address and responds to concerns people may have about the impact of sites H4/C6. We strongly feel that any anti development sentiment cannot be allowed to go unchallenged and be allowed to unduly influence and dictate the future

economic prosperity of Cromarty. Why remove a local opportunity for self builders to achieve home ownership, if any legitimate concerns about bringing a modest parcel of land to the west of the manse forward for development are respectfully addressed and dealt with? 18. There may be a visual perception of an attractive woodland background above the escarpment to the south west of Denny road, when viewed from Marine Terrace and elsewhere within the town, but it is a visual amenity only - there is no public access to it - it is all private woodland forming part of the manse and others gardens. 19. Our sites H4/C6 would contribute to the enhancement of the woodland background above the escarpment, by a tree-planting regime both around the individual plots and the public spaces within the wider site. It would also become ACCESSIBLE PUBLIC REALM unlike the current wooded backdrop adjacent to our proposed sites. 20. Our sites H4/C6 would become an additional ACCESSIBLE green space within Cromarty adding to and enhancing the existing mature tree-lined backdrop to the town. 21. Our sites H4/C6 to the south west of the manse would also contribute to the public realm of Cromarty by providing safe, attractive green routes, both by linking the town to the wider footpath network and creating additional public footpaths of which there is currently little in the SW environs of Cromarty. 22. Our proposal for inclusion of sites to the west of the manse includes for the footpath network around Cromarty to be enhanced and extended. For example the access to Lady Walk to the south of the gatehouse to Cromarty House is currently via the A832. We could link up with Lady Walk by creating a new off road path running parallel to the A832. 23. Similarly we would explore the option of creating a new footpath to the centre via the escarpment, exiting onto the Denny road pavement. 24. We will also consider & explore the feasibility of footpath widening improvements to Denny road. 25. Sites H4/C6 will provide for car usage but will not be dominated by it. We cannot dictate peoples habits re usage of the motor car. We can provide an alternative option to the car, by making safe, attractive, accessible pedestrian/cycle routes to the services in the centre of Cromarty. 26. Our proposed site H4/C6 is well within the current accepted norms & guidelines for walking to a shop and other services i.e. Site H4/C6 is within 400m of the centre. 27. Our proposal for inclusion of sites to the west of the manse with an advanced tree planting regime in place, would in the fullness of time, be visually similar to the current settlement boundary of mature trees running along side the manse boundary. Therefore the dominant characteristic on approach to Cromarty along the A832, would be the same as at present - a tree lined boundary abutting farmland. 28. There would be some loss of prime agricultural land which we feel is neither a relevant factor nor a material consideration. The development site proposed is small and is in the ownership of a local farming family. If required (and if any objectors are really that concerned about the loss of agricultural land!) more intensive farming production methods could compensate for any loss of land. 29. Both sites H4 & C6 would be subject to current planning legislation with the requisite amount of land given over to affordable/social housing pro rata based on the number of units consented. 30. In response to some of the concerns raised: There is already both historical precedent (Manse/Rosenberg) and recent development precedent (Urquhart Court, Greenwood) for development beyond the escarpment, we cannot wind the clock back – but we can create a contextual response to the setting (see vision statement etc). 31. In response to some of the concerns raised: Sites H4/C6 have been put forward for inclusion ahead of other sites because they are remote from any important or listed building. (e.g. war memorial, Gaelic chapel) 32. In response to some of the concerns raised: Sites H4/C6 were put forward ahead of other sites because they are outside the Cromarty House Designed Landscape. Summary From the call for sites procedure in 2010, we have been open about our intention to make some of the land Mr McBean owns adjacent to Cromarty available for local families to self build their own houses. While we recognise that the planning system cannot legislate for who builds there once consent is given, it is and always has been Mr McBeans stated intention that locals have preference. Initially we put forward some 7 sites for consideration under the call for sites procedure with the intention that through due process of dialogue and consultation we would eventually settle on 1 or 2 sites most suitable for self build housing. In summer 2013 we were given the impression by the IMFLDP team that sites H4 /C6 were considered the most suitable sites, under the preferred Alternative sites route which is why on release of this Proposed plan there is both surprise and disappointment that neither of the sites were included. We have a strong vision for these sites, and with careful consideration of the constraints and opportunities these sites can enhance and complement the housing offer in Cromarty. (see separate supporting Vision document which we submit as part of this consultation process). We will therefore have on public record a document which is much more than a plan showing an area zoned for housing. Our vision shows a real commitment to addressing the issues that a development may have on the historic character of Cromarty. Many of these issues are about Visual Impact. While not prescriptive, our Vision gives a flavour of Mr McBeans commitment to bringing land forward for self-build to Cromarty: •Commitment to design quality in the public realm •The investment in advanced structural landscaping infrastructure • Boundary conditions sympathetic to the historic environment • Footpath connectivity, and improvement of existing footpaths. •How the development can be accessed and integrated in an attractive manner. •How there is minimal visual impact on the existing townscape of Cromarty. •How concerns re access/visual impact can be addressed. •How structural landscaping can assist integration with the existing mature boundary. •How the existing historic landscape & buildings are visually protected.

Allocated to	Cromarty	General	General	
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Customer Number	00396	Name	Mr William Paton	Organisation	Scottish Water
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.141 Page 133	
Reference	Cromarty		Type	Change	Comment Late
					No

Comment Changes

Suggest substitution of existing sentence in 4.141 to read as follow: “The cumulative impact of all proposed development within the overall plan on shared treatment asset such as Assynt WTW makes it necessary for early engagement to take place between Developers and Scottish Water, to ensure any additional capacity demands in the asset can be delivered in line with development.”

Representation

Emphasises that engagement is important on an ongoing basis to address the cumulative impact of development on an asset which currently has significant free capacity and not as a result of a current capacity issue.

Allocated to	Cromarty	General	General	
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Customer Number	03847	Name	Mr Fraser Stewart	Organisation	Fraser Stewart Architects
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.140	
Reference	page 134 plan		Type	Change	Comment Late
				No	

Comment Changes

We would wish to see the settlement boundary above the escarpment more accurately reflect both the previous settlement boundary which included both the structural landscaping around the Manse, Rosenberg et al & historical areas such as the Gaelic chapel. war memorial etc and Urquhart Court, and the extension of that settlement boundary to include both the "rounding off" as in site C6 (as referred to on your previous plan iterations) and the extending along a natural contour line to include site H4.

Representation

1.The boundary as shown on the current proposed plan in the document has been changed out of all recognition from the previous local plan settlement boundary. 2.There is NO explanation anywhere in the documentation as to why this is being proposed. Any potential change MUST be addressed in a transparent manner. 3.The redrawn boundary if correct will greatly affect the prospects for the future economic vitality of this Historic town, as there is only limited available vacant space within the town for future growth. 4.We note that much of the built form above the escarpment has been taken out of the boundary shown on the proposed plan (p134). There is no written reference to, or justification of this potential significant change in the proposed plan. Just by changing a line on a drawing does not mean it is the correct thing to do! It requires a full accountable explanation. 5.Urquhart Court in the current proposed plan document is now shown isolated and ‘out on a limb’ in relation to the rest of Cromarty. This proposed plan change gives a totally FALSE impression of the settlement boundary. Why propose a change to a settlement boundary which already has a clear rational and includes the built forms of the Manse, Rosenberg, Greenwood and Urquhart Court within the boundary, as well as to the east; the Gaelic chapel /cemetery etc.? 6. Urquhart Court as a lozenge shaped island; if it is now the proposed boundary in the upper escarpment area it appears inconsistent and alien to the previous settlement boundary which included the adjacent built forms, including the Gaelic chapel, the Manse, Rosenberg, Greenwood et al. 7.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding off ” the currently approved boundary provides an easy win as a future proof rational for future growth within Cromarty. 8.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding” off the currently approved boundary was supported under the Alternative Sites and Uses consultation put forward in summer 2013 by Highland Council IMFLDP planning and development team 9.If the town/settlement boundary is being amended as per the proposed plan (see items 1-8) our proposal for inclusion of sites H4/C6 to the west of the manse would appear to be greatly disadvantaged, and if the proposed boundary change is approved it will adversely affect potential future growth. 10.The current proposed plan for Cromarty as published makes NO allowance for sites to be developed for self build purposes. The Sandilands site is not suitable for self-build, it is a town centre site where higher densities are expected and encouraged (i.e. no detached self build units) and is a developer led site. We attach extracts from our Vision document to show how both advance tree planting (or semi matures from day one) and structural planting can assist in preserving Cromartys character while also accommodating future growth.

Allocated to	Cromarty	General	General	
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Customer Number	03847	Name	Mr Fraser Stewart	Organisation	Fraser Stewart Architects
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.140	
Reference	CM1	Type	Change	Comment Late	No

Comment Changes

We would seek to have the land west of the Manse included as part of the CURRENT plan

Representation

There is a demand for self build in Cromarty, and Cromarty is the only settlement in the plan which makes No allowance for self build properties. Site CM1 is a developer led medium /high density scheme- NOT self build. Our sites H4 and C6 for self build housing were included in the Alternative sites and uses consultation of summer 2013. We have prepared Visual Impact Studies and illustrative plans and landscape plans which demonstrate how both these sites or either can sit comfortably in their context, whilst addressing concerns re privacy, landscape character etc. Please see the comment 1 illustrations and also the supporting illustrative plans for both landscaping , and the combined sites illustrative master plan.

Allocated to	Cromarty	General	General	
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Customer Number	01204	Name	Mr Evan McBean	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NS59 in Cromarty		Type	Change	Comment Late
				No	

### Comment Changes

Reinstate boundary line of settlement to correct location and reinstate Cromarty site NS59 into proposed plan

### Representation

why C6 is proposed to be removed when it was put forward by someone else in the Preferred Alternative Sites and Uses. In response to some of the statements in the Proposed Plan: - "Narrow footpath provision on Denny Road" The road is 6m wide and the footpath 940mm - there is enough room to widen the footpath if necessary. "Impact on tourism" The Congregational Board of the Church Of Scotland Parish Cromarty considers that houses west of the of the settlement boundary rather than in Cromarty inner green spaces will help to sustain tourism. "Concern about taking development beyond the escarpment" I think this comes from Mr. Tilbrook’s comments on Preferred Alternative Sites and Uses:- "Cromarty is almost entirely contained within the lower level raised beach area and this natural boundary gives it much of its character. It would be a pity to breach this by identifying further development land on the top of the brae". Was this his opinion a few years ago before he built his house on top of the brae? Mr. Tilbrook has of course recently built his own house within Rosenberg garden at the top of the brae. If H4 were approved for housing we would ensure that any houses would be built back from the edge of the escarpment and not visible from the town, unlike Mr. Tilbrook’s. Fortrose, Avoch and North Kessock have all been allowed to expand above the raised beach level in recent years – no explanation has been given as to why Cromarty should be the exception. "One respondent considers that there is a need to focus on the town itself and realise opportunities available within it (considering that some have been dismissed too readily) The various small gap sites and the larger area at High Street were the subject of rigorous examination through a previous Local Plan exercise. Almost all gap sites in Cromarty have been built upon during the previous local plan, and there is little scope for further development. The same respondent also states "Consideration should also be given to potential sea level sites to the East and West of Cromarty." There is almost no land near sea level to the West of the town. The land to the East is not currently in this plan, and there has been no indication that the landowner would be prepared to make it available. I don't think it would be a good idea to build near sea level with the risk of flooding! On 05/12/13 the Shore Road was closed with about 1.5m of sea water on it. "Access/remoteness to town" There are existing paths on the Council owned land behind Townlands Park which are frequently used and these could be enhanced or made into a pavement which would make the walkable distance to amenities less than that of some of the houses at the east end of Cromarty and encourage people not to use their car and improve the environmental footprint. Boundary alteration I cannot understand why the settlement boundary line can be proposed to be changed without any consultation or explanation. It was never mentioned in any documents made available to the public, or in the letter to local residents. Who asked for this change to take place? And who sanctioned it? Why has it been changed to not include the two houses at Rosenberg (one recently built), the Manse and the four houses under construction on Denny Road? Why is the graveyard not included in the proposed change? I would insist that a full explanation be given and the boundary line changed back to that of the original. The maps contained in Annex1 and 2 of this report show the differences between the original and altered boundary lines. I wish to work closely with the council and explore the possibility of making land available for a future graveyard and possibly for allotments, as the landowner, Major Phipps has told the Cromarty Allotments Society he is no longer prepared to allow allotments on CM3. There are access difficulties for Albyn Housing Association land at CM1. At present the vehicle access is intended to join the Denny at the top of the park, halfway down a steep hill. This is potentially dangerous and will require traffic calming measures to reduce the speed of downhill traffic. If H4 and C6 were to be given the go ahead, access could be via a new mini roundabout built to fit in with the Cromarty House gate lodge entrance. This would have the effect of slowing traffic on its approach to the Denny Road. Furthermore, I find it odd that 130 houses are going to be built in Fortrose & Rosemarkie with over 100 objectors and all I want to make available is about 10 sites to help Cromarty prosper for the future and it seems 2 objectors have managed to remove site C6 from The Preferred Alternative Sites and Uses. One objector has recently built a house on the hill near where I want to develop and the other objector thinks it's a good idea to build houses at sea level. The projected requirement indicated in the Draft Local Plan for all types of houses over the next 15 years is for 30 to 40 new dwellings link at- <http://www.highland.gov.uk/NR/rdonlyres/14391186-64AD-4ED2-A12F-A32EF1B159D1/0/SandilandsCromartyDevelopmentBrief.pdf>. The Albyn Housing development allows for 33 new dwellings (as described in recent correspondence between The Highland Council and Cromarty residents near the proposed Albyn development). My development proposal would fulfill the remainder of this requirement and allow for further development given that the requirements in the Draft Local Plan are now 10 years old and will need to be revised in 2018. Cromarty has continued to expand and prosper throughout the decades. As my land lies immediately adjacent to the town – it would seem only natural that further development would occur here to support a thriving town in need of expansion in conjunction with the current

Albyn development (CM1).

Allocated to	Cromarty
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General

General
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These representations are as submitted to the Highland Council and have only been changed (redacted) to exclude private contact details and invalid comments. The Highland Council will in due course summarise them and provide a response to those issues raised which are relevant to the development plan.

Customer Number	00407	Name	Mr Fraser Stewart	Organisation	Fraser Stewart Architects
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.139, 4.140	
Reference	P134, CM1		Type	Change	Comment Late No

### Comment Changes

In paragraph 4.140 there is acknowledgment that land west of the Manse might be included in a future LDP review, but we are firmly of the view that the land should be included NOW. Our vision proposal for sites west of the Manse (site H4/C6) include structural tree planting and privacy planting as part of any development proposed. We would like to see the area west of the Manse (site H4/C6) included, and the new settlement boundary amended to reflect this change. The settlement boundary on the escarpment as shown on P134 has changed beyond recognition from the previous boundary, and it must revert back to the original boundary amended to included the sites(s) H4/C6

### Representation

Cromarty / Settlement boundary/ Inclusion of sites H4/C6 Response to Inner Moray Firth Proposed Local Development Plan. December 2013 1.The boundary as shown on the current proposed plan( P134) has been changed out of all recognition from the previous local plan settlement boundary. 2.There is NO explanation anywhere in the documentation as to why this is being proposed. 3.The redrawn boundary if correct will greatly affect the prospects for the future economic vitality of this Historic town, as there is only limited available vacant space within the town for future growth. 4.We note that much of the built form above the escarpment has been taken out of the boundary shown on the proposed plan.(p134) There is no written reference to, or justification of this potential significant change in the proposed plan. 5.Urquhart Court in the current proposed plan document is now shown isolated in relation to the rest of Cromarty. This proposed plan change gives a totally FALSE impression of the settlement boundary. The settlement boundary already has a clear rational and includes the built forms of the Manse, Rosenberg, Greenwood and Urquhart Court within the boundary, as well as to the east; the Gaelic chapel /cemetery etc. 6. Urquhart Court as a lozenge shaped island on the partially wooded escarpment is inconsistent and alien to the previous settlement boundary. 7.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding off” the currently approved boundary provides an easy win as a future proof rational for future growth within Cromarty. 8.Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding“ off the currently approved boundary was supported under the Alternative Sites and Uses consultation put forward in summer 2013 by Highland Council IMFLDP planning and development team 9.If the town/settlement boundary is being amended as per the proposed plan (see items 1-8) our proposal for inclusion of sites H4/C6 to the west of the manse will be greatly disadvantaged, and if the proposed boundary change is approved it will adversely affect potential future growth. 10.The current proposed plan for Cromarty as published makes NO allowance for sites to be developed for self build purposes. The Sandilands site is not suitable for self-build, it is a town centre site where higher densities are expected and encouraged (i.e. no detached self build units) and is a developer led site. 11.The Sandilands site may accommodate 33 dwellings (mix not known), but all recent housing needs surveys suggest in excess of this is required, which is why sites H4/C6 should be included in the new IMFLDP to make provision for increased numbers. 12.Many of the sites identified for housing within the town have all been found to have had constraints in bringing them forward, which is yet another reason why site H4/C6 should be included in the new plan, as there are no issues holding back their zoning for self build plots. 13.There is a well-established self-build tradition in the Highlands and the Black Isle in particular for self build plots. While other settlements in the Black Isle make provision for housing (some of which could be self build) it is NOT reflected anywhere in the Cromarty proposed plan. This puts Cromarty at a great economic DISADVANTAGE compared with other Black Isle settlements. 14.The Sandilands developer offer, while it may offer a range of tenures and different unit types DOES NOT make provision for small self build plots which provide the route and stepping stone for many couples / families onto the property market. Where the conventional mortgage/owner occupier/ shared equity route is not an option, for these couples and families by providing the “sweat equity” into their new self build homes it makes the reality and prospect of a new home both achievable and affordable. 15.For Cromarty to thrive and prosper over the foreseeable future it requires a diverse offer in the future housing market. Our proposed sites H4/C6 to the west of the manse are a distinct offer which is different from, but can work along side the developer offer at Sandilands. 16.Cromarty’s distinctive character would not be adversely affected by the inclusion of sites H4/C6. Cromarty’s character is achieved via a combination of many elements; including a rich townscape, a fine grained fisher town, handsome former merchants house, more recent housing, civic buildings, historic buildings and landscapes, churches, ruins, harbour, wooded landscape and surrounding environs including the farmland up to the boundary. The addition of a further character area in sites H4/C6 to those already above the escarpment only adds to the diversity of the built and natural environment on offer in Cromarty as it seeks to secures its future in the 21st century. By careful and considered design (as illustrated in our supporting Vision document) sites H4/C6 can become yet another character area which contributes & enhances the

uniqueness of Cromarty. 17. Our vision statement for sites H4/C6 gives a flavour of how any visual impact can be mitigated. It seeks to address and respond to concerns people may have about the impact of sites H4/C6. We strongly feel that any anti development sentiment cannot be allowed to go unchallenged and be allowed to unduly influence and dictate the future economic prosperity of Cromarty. Why remove a local opportunity for self builders to achieve home ownership, if any legitimate concerns about bringing a modest parcel of land to the west of the manse forward for development are respectfully addressed and dealt with? 18. There may be a visual perception of an attractive woodland background above the escarpment to the south west of Denny road, when viewed from Marine Terrace and elsewhere within the town, but it is a visual amenity only - there is no public access to it - it is all private woodland forming part of the manse and others gardens. 19. Our sites H4/C6 would contribute to the enhancement of the woodland background above the escarpment, by a tree-planting regime both around the individual plots and the public spaces within the wider site. It would also become ACCESSIBLE PUBLIC REALM unlike the current wooded backdrop adjacent to our proposed sites. 20. Our sites H4/C6 would become an additional ACCESSIBLE green space within Cromarty adding to and enhancing the existing mature tree-lined backdrop to the town. 21. Our sites H4/C6 to the south west of the manse would also contribute to the public realm of Cromarty by providing safe, attractive green routes, both by linking the town to the wider footpath network and creating additional public footpaths of which there is currently little in the SW environs of Cromarty. 22. Our proposal for inclusion of sites to the west of the manse includes for the footpath network around Cromarty to be enhanced and extended. For example the access to Lady Walk to the south of the gatehouse to Cromarty House is currently via the A832. We could link up with Lady Walk by creating a new off road path running parallel to the A832. 23. Similarly we would explore the option of creating a new footpath to the centre via the escarpment, exiting onto the Denny road pavement. 24. We will also consider & explore the feasibility of footpath widening improvements to Denny road. 25. Sites H4/C6 will provide for car usage but will not be dominated by it. We cannot dictate peoples habits re usage of the motor car. We can provide an alternative option to the car, by making safe, attractive, accessible pedestrian/cycle routes to the services in the centre of Cromarty. 26. Our proposed site H4/C6 is well within the current accepted norms & guidelines for walking to a shop and other services i.e. Site H4/C6 is within 400m of the centre. 27. Our proposal for inclusion of sites to the west of the manse with an advanced tree planting regime in place, would in the fullness of time, be visually similar to the current settlement boundary of mature trees running along side the manse boundary. Therefore the dominant characteristic on approach to Cromarty along the A832, would be the same as at present - a tree lined boundary abutting farmland. 28. There would be some loss of prime agricultural land which we feel is neither a relevant factor nor a material consideration. The development site proposed is small and is in the ownership of a local farming family. If required (and if any objectors are really that concerned about the loss of agricultural land!) more intensive farming production methods could compensate for any loss of land. 29. Both sites H4 & C6 would be subject to current planning legislation with the requisite amount of land given over to affordable/social housing pro rata based on the number of units consented. 30. In response to some of the concerns raised: There is already both historical precedent (Manse/Rosenberg) and recent development precedent (Urquhart Court, Greenwood) for development beyond the escarpment, we cannot wind the clock back – but we can create a contextual response to the setting (see vision statement etc). 31. In response to some of the concerns raised: Sites H4/C6 have been put forward for inclusion ahead of other sites because they are remote from any important or listed building. (e.g. war memorial, Gaelic chapel) 32. In response to some of the concerns raised: Sites H4/C6 were put forward ahead of other sites because they are outside the Cromarty House Designed Landscape. Summary From the call for sites procedure in 2010, we have been open about our intention to make some of the land Mr McBean owns adjacent to Cromarty available for local families to self build their own houses. While we recognise that the planning system cannot legislate for who builds there once consent is given, it is and always has been Mr McBeans stated intention that locals have preference. Initially we put forward some 7 sites for consideration under the call for sites procedure with the intention that through due process of dialogue and consultation we would eventually settle on 1 or 2 sites most suitable for self build housing. In summer 2013 we were given the impression by the IMFLDP team that sites H4 /C6 were considered the most suitable sites, under the preferred Alternative sites route which is why on release of this Proposed plan there is both surprise and disappointment that neither of the sites were included. We have a strong vision for these sites, and with careful consideration of the constraints and opportunities these sites can enhance and complement the housing offer in Cromarty. (see separate supporting Vision document which we submit as part of this consultation process). We will therefore have on public record a document which is much more than a plan showing an area zoned for housing. Our vision shows a real commitment to addressing the issues that a development may have on the historic character of Cromarty. Many of these issues are about Visual Impact. While not prescriptive, our Vision gives a flavour of Mr McBeans commitment to bringing land forward for self-build to Cromarty: •Commitment to design quality in the public realm •The investment in advanced structural landscaping infrastructure •Boundary conditions sympathetic to the historic environment •Footpath connectivity, and improvement of existing footpaths. •How the development can be accessed and integrated in an attractive manner. •How there is minimal visual impact on the existing townscape of Cromarty. •How concerns re access/visual impact can be addressed. •How structural landscaping can assist integration with the existing mature boundary. •How the existing historic landscape & buildings are visually protected.

Allocated to	Cromarty	General	General	
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Customer Number	03847	Name	Mr Fraser Stewart	Organisation	Fraser Stewart Architects
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.139,4.140	
Reference	CM1	Type	Change	Comment Late	No

Comment Changes

We would wish to see the inclusion of both sites H4 and C6 (identified in previous draft plans) into land zoned for housing. There is a demand for self build housing in Cromarty which cannot be satisfied by the site CM1, which is a medium high density developer led proposal. Our alternative has local support, and we have carefully selected sites to have minimal visual impact on the town. Please refer to our attached vision document with Visual Impact Studies.The proposed settlement boundary on the current plan (p134) also appears to have "shrunk" without any justification, it should be expanded to include sites C6 and H4 as these would "round off" the existing settlement boundary.

Representation

Sites H4/C6 should be included for self build housing as there is insufficient capacity and type of housing on offer from site CM1. There is no opportunity for self build on site CM1. Sites H4/C6 will address that. All other Black Isle settlements have an opportunity for self build in the proposed plan, it is simply unjustified for Cromarty NOT to have that opportunity. Our proposal for the inclusion of sites H4/C6 was supported under the Alternative sites and uses consultation carried out by the IMFLDP team in Summer 2013. Cromartys character above the escarpment would not be affected by the inclusion of sites H4&C6, the wooded area above the escarpment will be enhanced and added to by our proposals. Our attached Vision document has visual impact studies which address any concerns. Neighbouring concerns about any loss of privacy have all been addressed by our structural landscaping proposals.(See attached supporting Vision document) The Denny Road footpath could be widened as part of our proposals. Site H4/C6 are well within the accepted norms for walking to a shop and other services in the Centre of Cromarty Our illustrative proposals (see attached supporting Vision document)also demonstrate how the existing footpath network can be enhanced and expanded. We feel strongly that the settlement boundary should not be as shown on p134, that is regressive and makes no allowance for any expansion of Cromarty. The boundary should be as our proposal for sites H4/C6 included on our attached Vision document of supporting information. The area above the escarpment is an integral part of Cromarty's character, which is why it must be included in the settlement boundary (as in previous plans), and must be expanded. Our Vision document seeks to demonstrate how, with a structural landscaping plan the existing wooded area can be carefully and sensitively added to whilst maintaining the character - of houses in woodland.

Allocated to	Cromarty	General	General	
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Customer Number	01204	Name	Mr Evan McBean	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.139 .There is NO land allocated for self build h	
Reference	Plan page 134, settlement boundary requires amend		Type	Change	Comment Late No

Comment Changes

Cromarty is the only settlement on the Black Isle which does not have future land allocated for housing which is suitable for self build. Site(s) suitable for self build to the west of the Manse have been put forward by us, and were accepted by the IMFLDP team under the Alternative sites process- but they have not materialised on the proposed plan! We have prepared a Vision document which clearly illustrates our proposals and address relevant issues.

Representation

1. Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding off ” the currently approved boundary provides an easy win as a future proof rational for future growth within Cromarty. 2. Our proposal for inclusion for development sites H4 & C6 to the west of the manse by “rounding” off the currently approved boundary was supported under the Alternative Sites and Uses consultation put forward in summer 2013 by Highland Council IMFLDP planning and development team 3. If the town/settlement boundary is being amended as per the proposed plan (see items 1-8) our proposal for inclusion of sites H4/C6 to the west of the manse will be greatly disadvantaged, and if the proposed boundary change is approved it will adversely affect potential future growth. 4. The current proposed plan for Cromarty as published makes NO allowance for sites to be developed for self build purposes. The Sandilands site is not suitable for self-build, it is a town centre site where higher densities are expected and encouraged (i.e. no detached self build units) and is a developer led site. 5. The Sandilands site may accommodate 33 dwellings (mix not known), but all recent housing needs surveys suggest in excess of this is required, which is why sites H4/C6 should be included in the new IMFLDP to make provision for increased numbers. 6. Many of the sites identified for housing within the town have all been found to have had constraints in bringing them forward, which is yet another reason why site H4/C6 should be included in the new plan, as there are no issues holding back their zoning for self build plots. 7. There is a well-established self-build tradition in the Highlands and the Black Isle in particular for self build plots. While other settlements in the Black Isle make provision for housing (some of which could be self build) it is NOT reflected anywhere in the Cromarty proposed plan. This puts Cromarty at a great economic DISADVANTAGE compared with other Black Isle settlements. 8. The Sandilands developer offer, while it may offer a range of tenures and different unit types DOES NOT make provision for small self build plots which provide the route and stepping stone for many couples / families onto the property market. Where the conventional mortgage/owner occupier/ shared equity route is not an option, for these couples and families by providing the “sweat equity” into their new self build homes it makes the reality and prospect of a new home both achievable and affordable. 9. For Cromarty to thrive and prosper over the foreseeable future it requires a diverse offer in the future housing market. Our proposed sites H4/C6 to the west of the manse are a distinct offer which is different from, but can work along side the developer offer at Sandilands. 10. Cromarty’s distinctive character would not be adversely affected by the inclusion of sites H4/C6. Cromarty’s character is achieved via a combination of many elements; including a rich townscape, a fine grained fisher town, handsome former merchants house, more recent housing, civic buildings, historic buildings and landscapes, churches, ruins, harbour, wooded landscape and surrounding environs including the farmland up to the boundary. The addition of a further character area in sites H4/C6 to those already above the escarpment only adds to the diversity of the built and natural environment on offer in Cromarty as it seeks to secures its future in the 21st century. By careful and considered design (as illustrated in our supporting Vision document) sites H4/C6 can become yet another character area which contributes & enhances the uniqueness of Cromarty. 11. Our vision statement for sites H4/C6 gives a flavour of how any visual impact can be mitigated. It seeks to address and responds to concerns people may have about the impact of sites H4/C6. We strongly feel that any anti development sentiment cannot be allowed to go unchallenged and be allowed to unduly influence and dictate the future economic prosperity of Cromarty. Why remove a local opportunity for self builders to achieve home ownership, if any legitimate concerns about bringing a modest parcel of land to the west of the manse forward for development are respectfully addressed and dealt with? 12. There may be a visual perception of an attractive woodland background above the escarpment to the south west of Denny road, when viewed from Marine Terrace and elsewhere within the town, but it is a visual amenity only - there is no public access to it - it is all private woodland forming part of the manse and others gardens. 13. Our sites H4/C6 would contribute to the enhancement of the woodland background above the escarpment, by a tree-planting regime both around the individual plots and the public spaces within the wider site. It would also become ACCESSIBLE PUBLIC REALM unlike the current wooded backdrop adjacent to our proposed sites. 14. Our sites H4/C6 would become an additional ACCESSIBLE green space within Cromarty adding to and enhancing the existing mature tree-lined backdrop to the town. 15. Our sites H4/C6 to the south west of the manse would also contribute to the public realm of Cromarty by providing safe, attractive green routes, both by linking the town to the wider footpath network and creating additional public footpaths of which there is currently little in the SW environs of Cromarty. 16. Our proposal for inclusion of

sites to the west of the manse includes for the footpath network around Cromarty to be enhanced and extended. For example the access to Lady Walk to the south of the gatehouse to Cromarty House is currently via the A832. We could link up with Lady Walk by creating a new off road path running parallel to the A832. 17. Similarly we would explore the option of creating a new footpath to the centre via the escarpment, exiting onto the Denny road pavement 18. We will also consider & explore the feasibility of footpath widening improvements to Denny road. 19. Sites H4/C6 will provide for car usage but will not be dominated by it. We cannot dictate peoples habits re usage of the motor car. We can provide an alternative option to the car, by making safe, attractive, accessible pedestrian/cycle routes to the services in the centre of Cromarty. 20. Our proposed site H4/C6 is well within the current accepted norms & guidelines for walking to a shop and other services i.e. Site H4/C6 is within 400m of the centre. 21. Our proposal for inclusion of sites to the west of the manse with an advanced tree planting regime in place, would in the fullness of time, be visually similar to the current settlement boundary of mature trees running along side the manse boundary. Therefore the dominant characteristic on approach to Cromarty along the A832, would be the same as at present - a tree lined boundary abutting farmland 22. There would be some loss of prime agricultural land which we feel is neither a relevant factor nor a material consideration. The development site proposed is small and is in the ownership of a local farming family. If required (and if any objectors are really that concerned about the loss of agricultural land!) more intensive farming production methods could compensate for any loss of land. 23. Both sites H4 & C6 would be subject to current planning legislation with the requisite amount of land given over to affordable/social housing pro rata based on the number of units consented. 24. In response to some of the concerns raised: There is already both historical precedent (Manse/Rosenberg) and recent development precedent (Urquhart Court, Greenwood) for development beyond the escarpment, we cannot wind the clock back – but we can create a contextual response to the setting (see vision statement etc). 25. In response to some of the concerns raised: Sites H4/C6 have been put forward for inclusion ahead of other sites because they are remote from any important or listed building. (e.g. war memorial, Gaelic chapel) 26. In response to some of the concerns raised: Sites H4/C6 were put forward ahead of other sites because they are outside the Cromarty House Designed Landscape. Summary From the call for sites procedure in 2010, we have been open about our intention to make some of the land Mr McBean owns adjacent to Cromarty available for local families to self build their own houses. While we recognise that the planning system cannot legislate for who builds there once consent is given, it is and always has been Mr McBeans stated intention that locals have preference. Initially we put forward some 7 sites for consideration under the call for sites procedure with the intention that through due process of dialogue and consultation we would eventually settle on 1 or 2 sites most suitable for self build housing. In summer 2013 we were given the impression by the IMFLDP team that sites H4 /C6 were considered the most suitable sites, under the preferred Alternative sites route which is why on release of this Proposed plan there is both surprise and disappointment that neither of the sites were included. We have a strong vision for these sites, and with careful consideration of the constraints and opportunities these sites can enhance and complement the housing offer in Cromarty. (see separate supporting Vision document which we submit as part of this consultation process). We will therefore have on public record a document which is much more than a plan showing an area zoned for housing. Our vision shows a real commitment to addressing the issues that a development may have on the historic character of Cromarty. Many of these issues are about Visual Impact. While not prescriptive, our Vision gives a flavour of Mr McBeans commitment to bringing land forward for self-build to Cromarty: • Commitment to design quality in the public realm • The investment in advanced structural landscaping infrastructure • Boundary conditions sympathetic to the historic environment • Footpath connectivity, and improvement of existing footpaths. • How the development can be accessed and integrated in an attractive manner. • How there is minimal visual impact on the existing townscape of Cromarty. • How concerns re access/visual impact can be addressed. • How structural landscaping can assist integration with the existing mature boundary. • How the existing historic landscape & buildings are visually protected.

Allocated to	Cromarty	General	General	
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Customer Number	00666	Name	Mr Garve Scott-Lodge	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.139-4.141	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Sites H4 and/or C6 to be allocated for housing.

Representation

Housing numbers for towns in the Black Isle in this draft of the new plan are as follows: Avoch 120 Conon Bridge 450 Cromarty 30 Culbokie 130 Fortrose & Rosemarkie 130 Munloch 60 North Kessock 90 Tore 450 It is notable that Cromarty underwent less new development than any other Black Isle town during the period of the previous local plan. It's astonishing that despite this, under the new plan the land zoned for housing in Cromarty is not only less than that in any other town, there has actually been a reduction in land available compared to the previous plan. In considering the opportunities for new builds in Cromarty the previous plan included the following areas for housing: Barkly Street, Daffodil Field, Walled Garden and Nicol Terrace. It also discussed the land at Ferro cottage. All of these areas have either been developed or are no longer available. Additionally the previous plan advised development could be carried out by filling gap sites. Since then new houses have been built in the Big Vennel, off Church St, on Duke St, in Urquhart Court, in the Royal Hotel garden, in Nicol Terrace, in converting the Byre restaurant, at the Salmon Bothie, in Rosenberg's garden and there is a 4 house development currently being built on the Denny. In total over 30 homes have been created in this period, many of them occupied by local people. Demonstrably there has been and is demand from local people for new housing. The new plan makes no attempt to fulfil this demand. It does not seem to take into account the fact that there are no longer any gap sites to be filled. The one, single site the plan makes available for development (CM1) is owned by a developer leaving no opportunity for self-building within the town. The new plan has a redrawn boundary for the town which differs from that in the previous plan. It shows the town as being smaller now than it was previously, which does not seem to make any sense. By including Urquhart Court, but excluding the Manse, Rosenberg and the new house in Rosenberg's ground it looks as if the line has been intentionally chosen to make sites H4/C6 seem remote from the town, when in fact they were contiguous to it under the previous plan. An explanation of why this odd decision was made and who made it would be appreciated. The Highland Council's school roll projections for the next ten years show that Cromarty Primary School's total roll is expected to fall by almost 20%, despite an assumption of an additional 46 houses to be built in the catchment area. (See attached). It should be a main aim of the new local plan to counteract this by allowing for housing opportunities for families. By restricting housing in Cromarty to a maximum of 30 the plan fails in this aim. Given that many of the communities in the Black Isle are worried about over development in their cases, it seems perverse that the town with the least development over the last 30 years should be earmarked as the town to have the least development for the foreseeable future. PS For the errata: in the Cromarty section (4.1.40) the word 'suitor' is used when it should be 'Sutor'.

Allocated to	Cromarty	General	General	
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