

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

Para 4.36 – insert after “major development sites”“but is constrained by transport and infrastructure capacity problems.” para 4.37: amend existing text to read: “The delivery of the A96(T) bypass is essential to resolve many of the existing capacity issues of the road network in and through Nairn. Approval will not be given to proceed with the development opportunities identified in the Plan until a bypass route is confirmed and a completion date determined. Delivery of improvements to the A96 and other routes in and through Nairn will require developer-contributions. All development sites will need to provide evidence that transport issues are being fully addressed - to resolve any existing constraints, to accommodate increased traffic levels, and to facilitate modal shift by providing integrated and networked alternative travel options such as cycle paths and walkways. In particular, development at Nairn South and on the eastern and western margins of the town will be dependent on, and should incorporate, appropriate access links to the realigned A96.”

Representation

see attached note of joint CC comments, specifically the introduction and section 1, headed THE IMPORTANCE OF THE BYPASS There have long been difficulties of congestion and access because the A96(T) runs through the town. The problems have become worse with the expansion of development in recent years. The existing road capacity is not adequate at present – there are particular challenges at pinch-points and certain junctions. Infrastructure improvement has not kept pace with the growth of the town and the traffic. Provision for alternative modes of travel – notably cycling and walking – are inadequate and patchy. The Plan should require delivery of footpath and cycle networks. Significant further expansion of Nairn depends on the delivery of a bypass (re-routing the A96) and long-term solutions to other access bottlenecks (eg the Cawdor Road railway underpass and the Lochloy junction). The recent incorporation of the Nairn bypass plans into a larger Inverness-Aberdeen dualling project has set aside the existing plans for a bypass, and put forward a new range of route options for consideration. There is now no agreed route and no definite timeframe for delivery of the bypass. Because the existing infrastructure is already a constraint, and because the choice of bypass route will affect the future shape of Nairn’s expansion, planning approval should not be granted for any major development sites in the town until a bypass route is agreed and a timetable for delivery is confirmed.

Allocated to

Customer Number	04215	Name	Cawdor Maintenance Trust	Organisation	Cawdor Maintenance Trust
Agent Name amd Organisation (if applicable)		Mr Alan R Farningham		KCC Consulting Ltd	
Section	4.Development Allocations		Paragraph		
Reference	NA6 Delnies		Type	Change	Comment Late
				No	

Comment Changes

Full support is given to the mixed-use site allocation reference NA6 Delnies on Page 66 of the Plan. There is also no objection in principle to the site allocation reference nos. NA8 Nairn South and NA9 Nairn South (long term) on Page 67 of the Plan. However, in the event that there is an issue with housing units being delivered out of Nairn South in the short to medium term as well as in the longer term on account of the well documented transport/access/network capacity issues associated with it, flexible consideration should be given in the Plan to allowing land west of Delnies to come forward to address the likely resultant shortfall in the housing land supply. Such narrative could be inserted at the end of Paragraph 4.37 on Page 64 of the Plan.

Representation

Justification for the suggested addition can be found in Paragraph 14.12.1 and Paragraph 14.13.1 - Policy 18 Nairn South on Page 56 of the adopted Highland wide Local Development Plan which highlights the potential access and traffic capacity issues associated with Nairn South in the short and medium term. Transportation/access issues in respect of the longer term development options promoted for Nairn South are further emphasised in Paragraph 4.37 on Page 64 of the Inner Moray Firth Local Development Plan Proposed Plan. In this regard, an extended Delnies allocation could be satisfactorily accommodated without a/the need for the proposed A96 (T) bypass. Such aspects are given greater resonance by the recent decision of the Highland Council's Planning Environmental and Development Committee which refused planning permission (Ref. No 11/04355/FUL) for site NA8-Nairn South on the 18 September, 2013 primarily on the basis of access and transportation network capacity issues. The scope for further development to the west of Delnies beyond the current Plan site allocation reference NA6 Delnies for 300no. homes, is found in Paragraph 14.11.1 - Policy 17 Delnies on Page 54 of the adopted Highland wide Local Development Plan under 'westward extension' which states that although Policy 17 contains no commitment to built development on land to the west of Delnies "the possibility of such development cannot be ruled out and should be taken into account in design for development of Delnies". In this regard, the detailed plans which are currently being prepared for the Delnies development, facilitate a road network and appropriate access to accommodate a logical extension of the Nairn settlement boundary to the west of Delnies.

Allocated to	Nairn	General	General	
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Customer Number	00311	Name	Mr Dick Youngson	Organisation	Nairn Suburban Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Nairn - General		Type	Change	Comment Late
				No	

Comment Changes

Representation

The Plan has been well presented and published. You and your colleagues have put a lot of time and effort into gathering and interpreting information. 2. We feel strongly that the "call for sites" and their inclusion in the Plan should not be seen as a guarantee that Planning Permission 'in Principle' or 'in Full' will be granted. Each case will still have to go through the full process of consultation. Many people who have received letters from Highland Council because they are within 80m of a "call for sites" believe that a new Planning Application is imminent. 3. The statistics for numbers of houses required for Nairn, Auld earn, Cawdor, Croy, Tornagrain (Petty), Ardersier and possibly Whiteness Head (9,600 + ? 2,000) for the so called "growth corridor" are unrealistic and destined to destroy the whole character of the area. It is an area of outstanding beauty and scenic attraction with Marine, Environmental, Geological and Built Heritage designations. 4. Land use in the "growth corridor" is agricultural with a southern zone of woodland. The woodland zone has had a long history of well managed broadleaved species with blocks of well managed coniferous species. Obviously most of the woodland zone has been part of the Management Plans and investment of the Private Estates with State Forestry becoming involved post WW2. The IMFLDP must not detract from these important primary land uses which generate local retained wealth and employment as well as Community Structure and Stability. In World Heritage Terms, we have a unique environment which has to be carefully managed for posterity. Short scale development proposals have to be in scale, carefully considered and for the benefit of The Community. Most of the schemes proposed do not benefit the local communities in cultural or financial terms. Most of the finance invested and resulting from development will be drawn out of the area by national developers, supermarkets or companies with head offices in the south. Tourism is a major industry in the Moray Firth Area and there is a tremendous potential to concentrate on developing all aspects of visitor enjoyment. This depends on not spoiling the main assets which we have inherited. Decision taking for Planning and Development must return to local Community level where there are competent organisations and Councillors with a wealth of local knowledge and understanding. This is the basis of the new Community Empowerment and Renewal Bill and the recent COSLA Report. After many public meetings of the Nairnshire CCs including Highland Councillors and officials, we are committed to working in partnership to empower our community, develop locality capacity and improve our locality planning process. We are sending this letter to you to ask for a meeting to explore using nairnshire as a model to help develop this process. We are keen to use this opportunity of changing government policy to develop a very efficient locality planning and delivery system for this or any locality. We are also sending this letter to Dr Stuart Black as our suggested best way forward in response to IMFLD P and if necessary the prioritisation of Nairnshire's Part of the IMFLDP deliberations in front of any reporter. We would like to suggest that we use the corporate memory and pool of expertise in Nairnshire to model a new way of ensuring Community engagement, and therefore responsibility and accountability for our next Nairnshire Plan. In these difficult financial times we must all have confidence and trust that the decisions are being made for "The Common Good" and in Nairnshire's best interests. We must also show value for money and the best possible local outcomes. In planning terms we again suggest that the plan is for 2015-2020. It must be pragmatic and realistic. Infrastructure must be in place and funded before any development is approved. Before the next plan for 2020-2025 there will be a review in the light of the financial situation. We will also review the population data, housing need data and housing completion data before that next 5 year plan. Our understanding is that HC through the PED committee will deliver best practice to ensure proper scrutiny of Transport Data. This policy will then be in place to restore public confidence on transport infrastructure. We think the HC corporate position on Nairn South necessitates that HC must also review its scrutinising role with the other departments and agencies involved in planning, again with a view to restoring public confidence and trust. These are our priorities for the next 5 year plan, ensuring that we deliver a sustainable future for Nairnshire in line with NPF3 and SPP proposals:- Priority 1 The Bypass Built This is fundamental to any realistic planning for Nairn and Nairnshire. We believe this is a shared priority and we should all be working together to achieve its reality. Many local people attended the road show at the Golf View showing how seriously Nairnshire is about planning and getting it right. Priority 2 Town Centre Regeneration We again would like to suggest a partnership approach to make this a reality. A lot of work and thinking has already been done but we must make it real. The CC, NICE, Association of Nairn Businesses, Tourist bodies, etc all think that we should have a dedicated Project Manager to give us the capacity to develop this exciting and essential development. It is obviously a complex task and the funding and recurrent revenue will all take a considerable amount of work. We would also like to involve Michael Fraser as a professional advisor to this project. We are clearly prioritising the Town Centre/High Street shopping/jobs and regeneration in this 5 year plan in line with "Place worth" thinking. Any further out of town centre development should be considered in the review and thinking about the 2020-2025 plan. Priority 3 Harbour Development/River /Beaches (the best beaches in Scotland) /Tourism /Leisure

and Recreation/Paths We want to take forward these exciting proposals and think again it will provide a significant sustainable boost to the Nairnshire economy. We again need a Project Manager dedicated to driving this forward. There will also be substantial professional fees around these major construction proposals in design and delivery , We have a local group dedicated to driving this forward which is a valuable resource that Nairnshire can contribute to make this work Priority 4 Sandown/Wetlands/Showfield/Common Good includin& best use of Common Good Assets/Housing- affordable/sheltered/self build/private This exciting project holds many of the keys to ensuring this fabulous future for Nairnshire. Again we have dedicated local groups who have done a lot of the preparatory work and thinking. There is year round tourist potential in Nairnshire's unique wetlands, including beaches, inter tidal flats and river environments with our winter bird populations. We think we can solve many of our local housing needs between Sandown, town centre and the existing farmers' field. Again we think the amount of work to be done needs a project manager to give us the professional capacity to maximise all the local knowledge and skills in this complex project. Priority 5 Nairn Housing Developments . We wish to ensure that we can meet Nairn's housing needs from 2015-2020. Our position is clearly that the infrastructure must be in place and affordable before any housing goes ahead. It should also be meeting real local need and conform with the SPP f NPF3 guidance that we hand over an attractive sustainable town to future generations. We think these housing needs can be met at Lochloy on existing zoned land, town centre, Sandown, farmer's field, Achareidh and Nairn infill sites. We wish to work with HC to make sure we balance housing needs with keeping Nairn an attractive place and supporting our major tourist industry. We also must not put one of our other major employers -Gordon's Sawmill at risk. We will review all other sites and need for sites for the 2020-2025 as agreed above. Priority 6 Nairnshire and its links to Nairn as its County Town Greater Nairnshire with Ardersier /Fort George/Castle Stuart/Croy /Kilravock CastlefCawdor /Cawdor castle I Auldearn and all its history fGlenfernessjDavaf LochindorbfWolf of Badenoch's Castle(? already spoiled by wind farm)/Logie/ Findhorn and Culloden and Brodie/Brodie Castle just outside are fabulous tourist and local attractions. We must maximise the tourist and leisure and recreation opportunities that all these assets give us. In building the necessary bypass for Nairn we must carefully plan the local roads and routes including public transport to ensure the vital synergy between Nairn and its county. Any housing developments in Nairnshire must prioritise local need and not put at risk our beautiful and historic communities and their invaluable tourist assets. OUR JOINT CC PROPOSALS. We are therefore proposing that HC and the Scottish Government work in partnership with Nairnshire to develop this model for our sustainable and exciting future. The CC proposal is that we meet quarterly with the 4 Local councillors, Business/Tourist, Health and Social integrated team/social interprise company. This will ensure we are ahead of the loop and will maximise use of local knowledge and skills to bring forward best value for money proposals. The local scrutiny role will ensure that all agencies are delivering the whole range of quality local services we wish to see. In cost terms 3 Project Managers, at about £50,000 each total costs, will give us the capacity to start to develop and deliver these exciting plans. We will seek from multiple funding sources about £1 million a year for 3 years to fund these proposals and thereafter look to our "Fair Share" budget to recurrently fund Nairnshire.

Allocated to	Nairn	General	General	
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Customer Number	04359	Name		Organisation	Nairn Kayak Club
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Agent Name amd Organisation (if applicable)	HHL Scotland	HHL Scotland
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Section	4.Development Allocations	Paragraph	4.32 Nairn
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Reference		Type	Change	Comment Late	No
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Comment Changes

Nairn Kayak Club wishes the Nairn Harbour Area and environs to be zoned for 'Commercial, Recreation and tourist related Developments' along the lines of the attached map and for it to be noted that the Council will pro-actively support environmental enhancement of the area.

Representation

Nairn Harbour plays an important social and economic role within Nairn and is seen by Local Elected Councillors, NICE, Nairn Kayak Club & Nairn Sailing Club as a strategic asset in the future development of Nairn as a regionally important tourist location. Furthermore, Nairn Harbour still has a commercial function which needs to be safeguarded from inappropriate development/uses of the harbour area. Finally, both the Sailing Club and Kayak Club have ambitions to develop the Harbour Environs as a regional and national important training venue for dinghy sailing and kayak sprint racing, which will require the provision of new facilities within the harbour area and we would wish the plan to supports these ambitions.

Allocated to	Nairn	General	General	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	1.Introduction		Paragraph	Paragraph 1.5: Vision & Spatial Strategy	
Reference	Site NA8 & NA9		Type	Support	Comment Late No

Comment Changes

Representation

The Spatial Strategy shown on Map 1 is supported, which illustrates that Nairn is a key town where the IMF Proposed LDP identifies significant housing within the Local Development Plan (LDP) growth period. The IMF Proposed LDP identifies that it aims to concentrate development on existing settlements, create sustainable new communities, provide the infrastructure and transport network required to support these communities whilst ensuring the area’s most valuable built and natural assets are protected. It is considered that the land identified in Appendix 1, which is in the control of the consortium, can fulfill both the spatial strategy and its stated objectives.

Allocated to	Nairn	General	General	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	2.Guiding and Delivering Development		Paragraph	Policy 2 Delivering Development	
Reference	NA8 & NA9		Type	Support	Comment Late No

Comment Changes

Representation

Development of the locations and uses specified in Section 4, that is sites NA8 and NA9, of the IMF Proposed LDP are supported in accordance with the requirements of Policy 2. It is noted that the requirements relate to provision of the necessary infrastructure, services and facilities required to support new development proposed as indicated in this Plan. Larger sites must be appropriately masterplanned. Each phase of development will require to show its relationship to this overall masterplan and demonstrate how the required infrastructure will be delivered. This Policy is supported, subject to comments on Site NA9. The consortium are concerned over the requirement in the IMF Proposed LDP for the restriction of the commencement of NA9 prior to the completion of NA8.

Allocated to	Nairn	General	General	
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Customer Number	04485	Name	Fraser Grieve	Organisation	Scottish Council for Development and Industry
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	4.32 - 4.41		Type	Change	Comment Late
				No	

Comment Changes

Need to see progress being made on a Nairn bypass as part of the A96 upgrade

Representation

SCDI would agree with the areas highlighted within the development plan but would make special note of the need to see progress being made on a Nairn Bypass as part of the A96 upgrade.

Allocated to	Nairn	General	General	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	Appendices		Paragraph	Strategic Environmental Assessment Append 4a	
Reference	Strategic Environmental Assessment Append 4a		Type	Support	Comment Late
				No	

Comment Changes

Representation

The consortium supports the Council’s identification of sites NA8 and NA9 in the IMF Proposed LDP. Pages 802 to 806 of Appendix 4a of the SEA support the allocations of these sites in the IMF Proposed LDP. Having regard to the nature of this assessment, with only 3 negative ratings out of the 36 criteria specified have been attributed to these allocations. The potential negatives, identified by the Council, relate to the fact that the sites are currently Greenfield in status, there will be a material change in their landscape character and a development of the scale proposed would need to include some lighting in the interests of safety however this would be limited to distributor roads. The additional 33 criteria assessed identify that the environmental impacts of the development of these sites would be either neutral or positive. It is considered that, in planning terms, the results of the SEA identify that these sites are well located to accommodate the development proposed in the IMF Proposed LDP and should be supported.

Allocated to	Nairn	General	General	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Nairn	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

There does not appear to be any land zoned for industry, other than NA12, if we are to be building more houses then we need land zoned for business and industry. This plan does not show any new zones in these categories.

Allocated to	Nairn	General	General	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	paras 4.32 to 4.41	
Reference	Nairn (general)		Type	Change	Comment Late No

Comment Changes

para 4.32 - add two more bullet points: * - preservation, protection and enhancement of the beaches, coastal environment, harbour facilities and Riverside of Nairn as key amenities for both residents and visitors. * - creation, development and expansion of a safe and integrated network of paths and cycleways within and beyond the town. para 4.33 - add "the impact of development on the quality of Nairn's historic and natural assets which are key to the tourism economy will be a material planning consideration". para 4.34 - add "This will be based on an integrated masterplan drawn up in consultation with (or by) the local community which will take account of the eventual re-routing of the A96 and the scope to extend the Conservation area". para 4.35 - insert at beginning - "The harbour, Links and beaches are vital features of the town." para 4.37 - insert new 2nd sentence. "Major developments will not be approved until a bypass route is agreed and delivery timetable confirmed". para 4.39 - insert after Audit "including the Coastal Trail and cycle path networks"

Representation

The textual changes are largely self-explanatory. The aim is to highlight more clearly the importance of safeguarding and enhancing Nairn's natural,environmental and heritage assets which are essential for the current and future growth of the local tourism economy (which is not just historic and Victorian!). The need for town centre regeneration to be locally-driven and to cover the whole of the centre, High Street and harbour area is self-evident but needs to be clearly stated. The new approach outlined in the draft Community Empowerment Bill, and the principles in the Malcolm Fraser Review, are directly relevant. The bypass is critical. It is in the interests of both local community and prospective developers that the route and the delivery-timing of the bypass is firmly fixed before developments are approved. The obvious reason is to ensure that access and transport capacity issues are fully addressed before development proceeds and that infrastructure keeps pace with development rather than having to catch up afterwards or be "retrofitted". Much greater priority, and explicit mention, needs to be given to the creation of safe cyclepaths and walkways, both as alternatives to the car (modal shift) which means dedicated and networked routes into and through the town; and for recreational purposes where the national policy commitment to accessing open spaces, the coast and the rural hinterland is very clear.

Allocated to	Nairn	General	General	
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Customer Number	00511	Name	Mrs C Stafford	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Paragraph 4.36, Page 63	
Reference	Nairn		Type	Change	Comment Late
				No	

Comment Changes

I object both to the lack of clarity in paragraph 4.36 and to the principle from which I assume the first sentence, ('The potential for settlement growth in Nairn is based around the development of the major development sites, established through the HwLDP, at Delnies, Lochloy, Nairn south and Sandown') is derived. I require that the 'link' between the site specific allocations in the HWLDP and the corresponding site specific allocations in the IMFLDP is broken.

Representation

I object both to the lack of clarity in paragraph 4.36 and to the principle from which I assume the first sentence, ('The potential for settlement growth in Nairn is based around the development of the major development sites, established thorough the HwLDP, at Delnies, Lochloy, Nairn south and Sandown') is derived. I require that the 'link' between the site specific allocations in the HWLDP and the corresponding site specific allocations in the IMFLDP is broken. My rationale for this objection is as follows. Planning Circular 1 2009; Development Planning contains the following policy on implementation of legislation or procedures. ...Strategic development planning authorities (SDPAs) are required by section 4(1) of the Act to prepare and review strategic development plans (SDPs), and submit these to Scottish Ministers within four years of the approval of the existing plan. The SDPA Designation Orders of 2008 only established SDPAs in the Glasgow, Aberdeen, Dundee and Edinburgh city regions. ...Section 16 of the Act requires all planning authorities to prepare one or more local development plan (LDP) for their area as soon as practicable after the Act comes into force. These must cover the whole of the authority's area, although one location may be covered by more than one LDP if prepared for different purposes (e.g. minerals), and LDPs may extend across the areas of more than one planning authority. Regardless of how many LDPs cover a local authority area, all must be replaced at least every 5 years. Authorities must also keep theirplans under review. ...Section 15 of the Act requires LDPs to contain a spatial strategy, this being a detailed statement of the planning authority's policies and proposals as to the development and use of land. Outside SDP areas, LDPs must also contain a vision statement, as described in paragraph 14 above. Planning authorities may also include any other matters in the plan that it considers appropriate. ...Scottish Ministers expect LDPs to be concise map-based documents that focus on their specific main proposals for the period up to year 10 from adoption. Outside SDP areas, they should also provide a broad indication of the scale and location of growth up to year 20. Minor proposals and detailed policies may be removed to supplementary guidance, especially if there is no significant change from the previous plan, and provided an appropriate context remains in the plan itself. In SDP areas, LDPs need not repeat policy material contained in the SDP. Report 59/13, which was presented at of the Planning, Environment and Development Committee held on Inverness on Wednesday, 18 September 2013, notes that: The HwLDP includes some development sites (and corresponding text) that lie within the Inner Moray Firth (IMF) area. These sites have been tested through an independent Examination and so the principle of development has been accepted. The vast majority of these sites have been "rolled forward" into the Proposed Plan with little or no change. It is therefore intended that any Proposed Plan content that was previously approved through the HwLDP should not be re-examined through the IMFLDP process. Minor changes such as the mix of uses or phasing would be open to comment. Some of the same sites now have an extant planning permission, for example at Delnies, Tornagrain and Stratton. It is intended to take a similar approach to these sites. The IMFLDP itself states that, 'Any allocation and text in the adopted HwLDP that relates to sites within the Inner Moray Firth Area will be updated by this plans content' Inverness is not an SDPA and therefore it appears that there is no requirement for a separate strategic document, however, in recognition of the geographical issues that Highland Council faces, it may be reasonable to consider the HwLDP as a 'pseudo structure plan' for Highland wide policies. However, the HwLDP is not an SDP; it is simply, in terms of land allocation, an LDP. Circular 4 2009 quite clearly expresses that the same site should not appear in two different LDP's unless it is for different purpose. The public should not be prevented from commenting on all planning aspects relating to all the sites that have been rolled forward from the HwLDP to the IMFLDP. The economic climate continues to change and the Area LDP should be open to challenge and evaluation in the light of these ever changing financial circumstances.

Allocated to	Nairn	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	Bullet 6 Page 63	
Reference	Nairn	Type	Change	Comment Late	No

Comment Changes

We would ask that in addition to the requirement for improvements to waste water treatment provision that improvements to the networks will almost certainly be required.

Representation

A minor addition to ensure developers are aware of the potential requirement for network investigation and mitigation with significant development focussing on the edges of the settlement and connecting to well established housing and their networks.

Allocated to	Nairn	General	General
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	Appendices		Paragraph	MAIN ISSUES REPORT (MIR) & RECOMMENDED RESPONSES	
Reference	MAIN ISSUES REPORT (MIR) & RECOMMENDED RESP		Type	Change	Comment Late No

Comment Changes

Whilst it is not possible to request a change to this Background Paper, the consortium would be grateful if the following comments are taken into consideration in support of previous submissions on the Proposed Action Programme.

Representation

The Council's summary of responses (MIR Ref: MIR 7.1) on comments on Nairn sites MU4 and MU5 (now referenced in the Proposed IMF LDP as NA8 and NA9) raise concerns for the reasons stated in submissions on the Inner Moray Firth Proposed Local Development Plan: Proposed Action Programme. The Council's response to consultations received states: "An existing Transport Assessment, supports the development of 319 dh at Nairn South on land between Cawdor and Balblair Road, this has been considered by the Council's roads engineers and has been found to be generally acceptable subject to some amendment and with the requirement for a pause and review to assess the impact of traffic as the development progresses. Any further development will need to demonstrate that existing or improved road capacity can accommodate further development prior to the construction of the A96 (T) bypass." The requirement for a pause and review was introduced by Members of The Highland Council when agreeing to the Strategic Masterplan, Phases 1 & 2, Nairn South. This requirement was not subject to consultation and is not supported by the Transport Assessment submitted with the referred to planning application for 319 houses with Site NA8. For the reasons provided in the submissions on the Proposed Action Programme, it is considered that the requirement for a pause and review is inappropriate and not justified on planning grounds.

Allocated to	Nairn	General	General
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Customer Number	04354	Name	Michael Green	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.36	
Reference			Type	Change	Comment Late
				No	

Comment Changes

I wish to see mixed use development prioritized and development around Sandown and Delnies, with Sandown being the first priority.

Representation

Sandown will provide the best opportunity for mixed use which is what is required in Nairn. It is also owned by the Nairn Common Good Fund, which will assist the development of any proposed mixed use. Development at Nairn South will threaten the viability of our largest employer, Gordons Sawmill , plus the current traffic infrastructure will not be able to cope with any large scale development.

Allocated to	Nairn	General	General	
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Customer Number	04216	Name	Brian Stewart	Organisation	Nairn West, River and Suburban Community Councils - joi
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.33, 4.34, 4.35 and Site NA7	
Reference	Nairn Town Centre regeneration, and Site NA7		Type	Change	Comment Late
				No	

Comment Changes

para 4.33 – insert additional final sentences, with text as indicated in the document attached. para 4.34 - add extra sentences after existing text, as provided in the attached document. para 4.35 - insert an additional phrase at end of second sentence: “ in consultation with the local community and relevant public agencies.” page 66, table-entry for Site NA7 – completely rewrite the Requirements to read as in the text recommended in the attached document.

Representation

See document attached to Comment 1, in particular the section 2, which includes proposed wording for the requested amendments and is headed THE REGENERATION OF THE TOWN CENTRE (Site NA7) AND FISHERTOWN (para 4.35) In line with current Scottish Government policy and the “Town Centres First” principles (para 2.8), action to revive and regenerate the town centre of Nairn is a higher priority than further expansion of the residential capacity of the town. A systematic and integrated regeneration plan – rather than piecemeal development of individual town-centre sites – is required. The existing “development brief” requires redrafting: at present it covers only the Council-owned land and does not take the holistic approach which a redevelopment masterplan requires. The key importance of tourism and recreation (mentioned in para 4.20 but essentially only in relation to golf) should be properly identified as a material consideration in current development planning – for both Nairn town and harbour area – and not just as a feature of Nairn’s Victorian past (para 4.33). Planning for Fishertown is subject to Conservation guidelines. Action to maintain, upgrade and enhance the harbour should take account of tourism-policy objectives and the importance of recreational and leisure activities to the local economy. There is an argument for requiring developers of sites elsewhere in and around Nairn to contribute (via section 75 agreements) to measures to improve the town centre – as was done with the Sainsburys’ development.

Allocated to	Nairn	General	General	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	paras 4.32 to 4.41 and site list	
Reference	NA8 and NA9 - Nairn South - and NA12 - Sawmill		Type	Change	Comment Late No

Comment Changes

In NA8 Requirements, insert after Development "once bypass route, linkages and timing are firmly decided, " After Masterplan, insert "revised and amended to reflect updated appraisal of transport and other infrastructure constraints, the delivery of mixed business and other uses as well as housing from the initial phase, appropriate landscaping and layout considerations, and adequate scope to permit the continuing operation and future expansion of the sawmill". After 'transport assessment', add "including measures to resolve for the long term the railway-underpass bottleneck, create an cycle path network connecting into the town, and to provide an additional crossing over the railway during the first phase of development". Also delete 'identification' and insert "delivery", and after 'recreational' delete "access management plan" and insert "facilities and amenities". Corresponding amendments need to be made to the site entry for NA12 (by inserting "revised" before 'Nairn South Strategic Masterplan'.

Representation

The existing strategic masterplan is neither credible nor fit for purpose and requires re-writing to reflect more clearly the need to address the challenges which have now been identified and which led to refusal of a recent application. The delivery of a Nairn bypass (now an element of A96 dualling) has always been seen as a critical prerequisite for the development of the Nairn South site. The recent planning discussions have reinforced that judgment. The IMFLDP has to recognise and reflect that in the specific guidance on the NA8 and NA9 sites. The future expansion of the town and the evolution and shape of the whole area south of the railway line depends critically on the route chosen for the A96 dualled bypass and the location of junctions with it. The development currently indicated for the short-to-medium term cannot sensibly proceed without a clear blueprint for the wider area defined by the route which the bypass takes. There needs to be joined-up planning between Transport Scotland and Highland Council to optimise the configuration of both travel routes and urban expansion. At present the IMFLDP appears to ignore the influence, implications and impact of the bypass route choice.

Allocated to	Nairn	General	General	
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Customer Number	00912	Name	Mr W MacLeod	Organisation	
Agent Name amd Organisation (if applicable)		Natasha Douglas		Ryden LLP	
Section	4.Development Allocations		Paragraph		
Reference			Type	Change	Comment Late
				No	

Comment Changes

It is requested that the Plan is changed to identify land at Fort Reay, Sandown Farm Lane, Nairn (MIR reference H1) for residential development. A table should be inserted on page 74 to include land at Fort Reay, Nairn for the development of circa 35 dwellings. The proposals maps for Nairn should be modified to reflect and identify this allocation.

Representation

What is the specific change you would like to see in the final Plan? This representation is submitted to object to the proposed Local Development Plan (LDP). The proposed LDP has failed to identify land at Fort Reay, Sandown Farm Lane, Nairn (Main Issues Report Reference (MIR) H1) for development. It is requested that this is changed to include allocations at Fort Reay, Nairn. A table should be inserted on page 74 of the proposed LDP to include land at Fort Reay, Nairn for residential development. The proposals maps for Nairn should be modified to reflect and identify this allocation. Background A development bid was submitted to Highland Council in April 2011 identifying the site’s ability to accommodate residential development. The MIR identified the site as H1. A further representation was submitted to Highland Council in response to the publication of the MIR. The representation requested the allocation of the site and advised that whilst a layout had been prepared for 35 dwellings, the site was capable of accommodating in excess of 60 dwellings. The land owner is aware of Highland Council’s desire to retain the wooded area to the north east of the site however, the open areas lend themselves to development in keeping with the existing character of housing at Fort Reay and the surrounding area. Development of land at Fort Reay will therefore make for a high quality and attractive development, which is sympathetic to the character of local area. Justification Objection is made to the failure of the proposed LDP to identify land at Fort Reay, Sandown Farm Lane, Nairn (MIR site reference H1). It is respectfully requested that land at Fort Reay is allocated for development in the proposed LDP for several reasons, in particular given its location within the settlement and proximity to adjoining allocated sites reference NA6 Delnies and NA4 Sandown. Comments received in relation to the proposed LDP acknowledge that the site has development potential however, there has been a failure to allocate the site for development in the proposed LDP. In discussing the site concern was noted that the main constraint to the development of the site was tree loss, potential flood risk and access improvements. It is accepted that any development on the site could result in the loss of some trees however, significant areas of trees would be retained to the north of the site. Regardless of this, there is a significant proportion of the site that can be developed with minimal impact on the trees located on the site. We would confirm that it is only the most easterly part of the site that is identified by the SEPA Indicative River and Coastal Food Map as being at risk of flooding (see attached). No development is proposed on this part of the site. Nonetheless if requested a Flood Risk Assessment would be undertaken and submitted as part of any planning application for the site; which would identify any required mitigation measures. It is noted that flood risk is not a constraint solely experienced by land at Fort Reay. There are other sites allocated for development in the proposed LDP that are identified in the SEPA Indicative River and Coastal Food Map as being at risk from flooding (including site reference NA8) regardless of this constraint. Whilst comments received in relation to the proposed LDP note access to the site as being a constraint this was not identified as a constraint to the development of the site within the MIR. Given the scale of development at NA4, significant upgrades to the local road network will be made to accommodate development. The Sandown Development Brief states that development ‘presents an opportunity to retain and extend access routes in this part of Nairn’. Detailed provision will be determined through a Regional Access Management Plan, to be prepared at Masterplan stage. It is noted that the Sandown Lane/ Sandown Road Junction will be improved as part of the development of NA4. Development of NA6 brings further road improvements to the local area. A new roundabout is proposed to the west of NA4 which will provide a new distributor connection to the western boundary of NA4. This offers the potential to extend the distributor loop road through NA4 to connect to the A96 at Sandown Lane/ Sandown Road. The site at Fort Reay is therefore well placed to take advantage of these improvements. Furthermore, development of NA6 and NA4 will increase bus service provision in the area and will also deliver a number of foot and cycleways. This reinforces the fact that Fort Reay will be well served by a number of modes of transport thereby delivering a sustainable development. All of the issues identified as restricting development of the site can be overcome in advance of submitting a planning application and should not prevent the allocation of this site. Indeed the advantages of the site were recognised during consultation on the MIR which acknowledged that a significant advantage of the development is the potential for development to form part of the wider Sandown development. There are no barriers to the development of the bulk of Fort Reay and it should be identified for development. Whilst the proposed LDP lists three constraints, which are disputed, to the development of land at Fort Reay it has carried forward allocations from the Nairnshire Local Plan 2000 for development which have similar perceived constraints to development. For these sites tree loss and access to development are not considered to be constraints to development. Consequently they should not be cited as a

constraint to the development of land at Fort Reay. Had Highland Council adopted the same assessment criteria to land at Fort Reay it would have been allocated for development. In discussing development in Nairn the HwLDP explains in paragraph 14.1 that as there is only one major housing site under development in the Nairn area which acts as a 'constraint on the operation of the housing market'. As such, the release of further housing land in Nairn will assist in providing a choice of housing and stimulate the housing market. The HwLDP has adopted a strategy which identifies releases at Lochloy, Sandown as well as initial phases Delnies and Nairn South. Noting in paragraph 14.3 that development in Nairn must be seen in the long term aspirations for a bypass. Table 3 'Potential distribution of development to meet housing land requirement in the Nairn Housing Market Area', indicates that in the first period of the Plan (2011 – 2016) Nairn has the potential to accommodate 846 dwellings with this reducing to 747 in the second period (2016 – 2021). Sites identified by the HwLDP are carried forward into the proposed LDP. These are large scale expansion areas. Delivery of these sites to the market takes longer than smaller scale allocations as the site preparation and infrastructure requirements are greater. It is accepted that the proposed LDP has allocated two smaller sites (NA1 and NA3) however, they only amount to 36 units of housing. Their ability to deliver development having been allocated since 2000 is questioned. The proposed LDP should allocate land at Fort Reay in preference to these allocations as it can deliver development in the short term and has a land owner who is keen, willing and able to bring the site to the market. Allocation of land at Fort Reay is required to allow the Inner Moray Firth LDP to meet the housing targets set by the HwLDP. Allocation at Fort Reay, which is deliverable in the short term, would contribute to the housing land requirements. In doing so it would provide a choice of housing ensuring that allocations are not restricted to the larger scale housing sites, and will also assist in stimulating the housing market in Nairn assisting the Inner Moray Firth LDP meet the targets set by the HwLDP. Furthermore development of land at Fort Reay would contribute financially to identified strategic infrastructure requirements thus assisting Highland Council realise their vision for Nairn. Land at Fort Reay is ideally located to accommodate development. The site lies less than 380 metres from a bus stop, thereby promoting sustainable travel and complying with guidance contained within paragraphs 38, 39 and 168 of Scottish Planning Policy (SPP) all of which encourage the use of public transport. Fort Reay is also located in close proximity to the A96 which provides links to Inverness, Forres and Elgin. Fort Reay, lying to the west of Nairn, adjacent to the A96, provides excellent access to Inverness airport. Development of land at Fort Reay would promote sustainable travel and transport opportunities thereby reducing the reliance on the private car. Land at Fort Reay lies within the catchment area for both Nairn Academy and Rosebank Primary School. Nairn Academy is currently operating at 90% capacity which is forecast to decline to 82% in 2018/2019. Similarly Rosebank Primary School also has a declining school roll which is predicted to decline to 87% of capacity in 2015/16. Development at Fort Reay would support both these falling school rolls. Land at Fort Reay is bound to the south and west by NA4 Sandown. A Development Brief was approved as Supplementary Guidance in March 2012 by the Planning, Environmental and Development Committee. A concept Masterplan has been produced for the development at Sandown which highlights that land at Fort Reay will form an infill site following development of NA4. Development at Fort Reay, as an infill site, not only directs development to the best location, but makes the best use of land which is a finite resource. Development of land at Fort Reay would encourage the efficient use of land, thus achieving the objectives of SPP. The Development Brief for Sandown states that development will create employment, leisure and community facilities, retail, tertiary education and children's play area. Furthermore public transport services will be improved and there will be a number of infrastructure improvements such as, improvements to Sandown Farm Lane and the Sandown Road junction. Fort Reay is ideally located to take advantage of the services, facilities and improved infrastructure that development at NA6 and NA4 Sandown will deliver. Development of land at Fort Reay is therefore compliant with the aims of sustainable development. Paragraph 5 of SPP emphasises that the Scottish Government believes strongly in the value of forward-looking, visionary and ambitious plans that will guide development. As noted above, following the development of NA4, land at Fort Reay will form an infill site. Lying within the settlement boundary the site lends itself well to development. Land at Fort Reay is in private ownership and has no recreational or amenity value, it will therefore be out of place within a residential/ business area. In line with the advice contained within SPP, the Council should take a strategic view and allocate land at Fort Reay for development as an extension of NA4. To conclude, land at Fort Reay should be allocated for development. It is ideally located to accommodate development lying within 400m of existing public transport routes and services. Development of land at Fort Reay will also maximise opportunities offered by the development of both NA6 and NA4 Sandown. It is therefore respectfully requested that land at Fort Reay is identified for development. Conclusion To conclude, land at Fort Reay should be identified within the LDP for development. It is ideally located to accommodate development lying within 400m of existing public transport routes and services. Development of land at Fort Reay will also maximise opportunities offered by the development of both NA6 and NA4 Sandown. It is therefore respectfully requested that Fort Reay is identified for development within the LDP. Recommendation It is recommended that MIR site reference H1 is allocated in the LDP for the development of at least 35 dwellings.

Allocated to	Nairn	General	General	
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Customer Number	04354	Name	Michael Green	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.37 Nairn Bypass	
Reference		Type	Support	Comment Late	No

Comment Changes

Representation

The proposed Bypass is the number one priority for Nairn

Allocated to	Nairn	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	4.39 page 64	
Reference	Nairn	Type	Change	Comment Late	No

Comment Changes

We would ask that a minor addition be added similar to previous comments relating to capacity over the whole plan. Therefore after the sentence "The provision of upgrades....development of the settlement" we ask for a full stop inserted after settlement, followed with the following additional sentence: "Whilst capacity exists currently, the cumulative impact of all proposed development within the overall plan on shared treatment assets makes it necessary for early engagement to take place between Developers and Scottish Water, to ensure any additional capacity demands in the future can be delivered in line with development."

Representation

With the availability of the large water mains extension an Whiteness and the overall potential of Loch Ashie (and other augmenting sources) it is important to state that there is current capacity. Whilst the requirement for additional capacity at the Waste Water Treatment Works is closer on the horizon, we feel that reinforcing the message of available capacity and the process for planning is important.

Allocated to	Nairn	General	General	
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Customer Number	04033	Name	Archie Vallance	Organisation	
Agent Name amd Organisation (if applicable)					
Section	2.Guiding and Delivering Development		Paragraph	4.32	
Reference	Nairn		Type	Change	Comment Late
			No		

Comment Changes

Produce a road network plan which makes sense. Reduce the number of houses proposed and increase only in line with production of jobs in Nairn. Scrap Nairn South plans. Introduce a green belt to the east of the proposed by-pass.

Representation

Inner Moray Firth Proposed Local Development Plan I disagree completely with your proposals for the development of Nairn and its surrounding area and in particular Nairn South. There is no local demand for the number of houses postulated either now or in the future. Nor can I see any reason for Nairn to become a dormitory town for Inverness. Compare the number of jobs either now or in the future with the increased population proposed, they just do not make any sense. You profess to want Nairn to grow as a holiday destination I suggest covering the area with vast estates is not the way to do it. Many originally popular seaside towns have found it very hard to recapture their holiday markets. Allowing our High Street to become a boarded up row of shops is not the way to do it. It is therefore essential that any development has ready access to the town “by foot yes” but in particular by car. People do not go shopping on foot any more so parking and easy vehicle access is essential. Nairn and in particular Fishertown have developed slowly over the years and we should allow other areas to do the same not impose large modern estates designed by developers whose only raison d’être is to squeeze as many houses as they can get away with onto as large a site as they can find. If you are so sure jobs will come to the area then without doubt the houses will follow. Let us not do things in reverse. There are plenty of houses proposed closer to Inverness without spreading as far as Nairn. A large green belt to the west, perhaps spreading on the Nairn side of the proposed by pass would serve as a nice barrier. Preferably with plenty of trees to keep the noise from the by-pass to a minimum. Your Proposed Plan says you should safeguard and enhance special places. This particularly applies to Nairn the individual character is one of the main reasons that holiday makers and residents alike are attracted to the town. The “Town Centre First Principle” means you should look at sites within the town or with clear and easy access to it. This does not remotely apply to Nairn South. Neither can it be called “Sequential and Proportionate Growth” because these two terms certainly do not apply. That is presumably a planner’s term for sticking up a lot more houses. With regard to the number of houses, 1500 in Nairn by 2021 is complete nonsense. Nowhere in the document can I see any justification for this horrendous increase. Sandown 350 Lochloy 200 plus or including the recent application for 400 and those already under construction or presently unsold say another 100 Delnies 300 1350 Without Nairn South that gives somewhere in the region of 4000 extra population. Please tell me where about 2000 or even 1000 jobs are going to be found in Nairn. All the above have access to the town centre via the existing road networks however in the case of Lochloy there will soon be an even greater problem at the junction of Lochloy Road and Forres Road. If the expansion is allowed to continue. The critical point is vehicle access, nowhere in the Plan have I seen a proposed road network for the town. We keep being fobbed off with promises of a future By Pass but that does not give us a sight of what a future road network would look like. The By Pass does not affect this. You can build a By Pass without changing any roads in Nairn, even those narrow country lanes to the west of Nairn South, which leaves us exactly where we are now. The latest proposed by-pass routes revealed by Transport Scotland show this is exactly what will happen. We really have to take notice of the fact that Nairn is segmented by the river and the railway and unless you provide vehicle access over or under these the houses must be severely limited. If we really must build at Nairn South, which as you will gather I do not agree with, then we must have a new Vehicle Railway Crossing to the west of the Station possibly joining with Duncan Drive and across the existing field to Bablair Road. The rail line is probably low enough at this point to allow a bridge over rather than a tunnel under it. Then there would be decent access to the town from Nairn South. A weight restriction would prevent heavy transport from using it to access the saw mill. This reduces the problem of the existing cramped bridge which cannot possibly cope with the increase of traffic the proposed expansion would evoke. Since all developers must contribute where there is a transport impact (Supplementary Guidance) the cost would be much reduced or ameliorated. This must be done before any building takes place, it is no good just promising to do it, we all know it never happens. Many people made very similar comments when other plans were put forward. In view of the recent planning refusal on Nairn South I hope the Council will take more notice this time. Let us also remember that once an area is designated for development someone will immediately want to build on it even if that is not really what the Council wants and may have a change of mind at a later date. Let us state firmly that some of this land will not be released until a later date or not at all, and mean it. I suggest the development plan and in particular that part relating to Nairn, be re-examined to give us a more acceptable future. [redacted]

Allocated to	Nairn	General	General	
Customer Number	00310	Name	Mr Tommy Hogg	Organisation
Agent Name amd Organisation (if applicable)				
Section	4.Development Allocations	Paragraph		
Reference		Type	Change	Comment Late
				No

Comment Changes

As per representation.

Representation

Nairn River Community Council wishes to erthe following comments on the IMFLDP 1.There are eight proposals for housing development NA1Showfield NA2S Kingsteps 90 NA3 Achareidh 6 NA4 Sandown 350 NA5 Lochloy 200 NA6 Delnies 300 NA8 Nairn South 520 NA9 Nairn South long term 410 We are concerned that these proposals are excessive and are an overprovision which Nairn will not be able to absorb. 2.The proposed developments have signalled the traffic problems that will ensue.The major issue is the provision of Bypass/Dualling to Nairn.Current discussions on the possible route shows he need for a speedy resolution of the route showing that there can be linkage especially to the proposed sites at Nairn South.At present the only suggestion for alleviating the bottleneck at The Cawdor Road Nairn Railway Station Bridge is the provision of sets of traffic lights which we feel will not contribute to improving the traffic flow within the town in general. 3.There are serious concerns about the sewage and waste water facilities which are already giving problems within the system.Para 4.39 states "there needs to be provision of upgrades to the water supply".There are already major problems in Fishertown area of the town during periods of heavy rain and high tides. We remind the Council of the advice given to them in 2006 by Halcrow Consultants That "It is essential that the opportunity for economic development in Nairn matches the overall aspiration for growth.There should be a clear balance between population growth and economic growth over the long term."

Allocated to	Nairn	General	General	
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Customer Number	04489	Name	K.F.S. Mackenzie	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Nairn - General		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

I would make the following general comment about the housing development proposed This appears to be approximately1900 houses over the next 10-20 years. This is a very significant number, and is not supported by the Highland Council Briefing of July 2012 which indicates an annual increase in population of 52 until2035 which would suggest no more than 25 houses should be built annually. Such a rate of construction is also supported by the recent level of house completions ..3The only reference to road provision is a bland statement refering to road transport provision with linkages to the A 96 9T) and forthcoming bypass. without any detail. The Development Plan requires to be far more specific on this matter. First the building of any bypass is liable to be some years away, and the improvement to the internal road system requires to be addressed now before a further 1900 house with consequent increase in population and extra road traffic is added. In addition to the difficulty in Waverley Road as above there is a major bottleneck on the Cawdor Road under the Railway, and the junction with Balblair Road is quite unsuitable for existing traffic. 4The Plan makes only minimal provision for commercial development .At NA 11 there is only 3.2 Ha for Business development and at NA 12 only 5.1 Ha for industrial development which would be earmarked for possible expansion by John Gordons SawMill Site. In relation to the proposed housing expansion of 1900 houses this does not appear to be enough in a community the size of Nairn Otherwise the expanded poulation will be obliged to travel elsewhere for work which in the supposed green environment we are asked to embrace cannot be in the best public interest.

Allocated to	Nairn	General	General	
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Customer Number	04362	Name	Ian Nalder	Organisation	
Agent Name amd Organisation (if applicable)					
Section	3.Strategy for Growth Areas		Paragraph	4.37 + NA8 +NA9	
Reference	Nairn South		Type	Change	Comment Late No

Comment Changes

Access from Nairn South into the town to be radically improved ALONG with access into and protection from the town's largest employers, the John Gordon Timber Mill

Representation

1) Granted that Government requires more houses, planners should specify the number of dwellings they wish for Nairn South - not leave this to builders 2) The route of the A96 south (or Nairn by-pass) to be first formalised before any further discussions are held with would-be builders 3)Only then should discussions recommence 4) At this stage builders must produce costed proposals for satisfactory access INTO the town PLUS essential earthworks to protect new residents from the multi-generation old timber business (unless they are prepared to fund this to change to an agreed new location) 5)Three options for satisfactory access into town stand out. Arguably not one is perfect. Maybe a combination of two will be necessary with other options welcome. a) widen the railway bridge on the Cawdor Road b) widen the railway bridge form Mill Lane into Church Street (not preferred as this will lead to block-backs in Leopold Street) c) Establish a route over the former level crossing west of town leading to Moss-side N.B. If no improvement is made to the access via the Cawdor Road block-backs are certain to threaten access to the Nairn & County Hospital thereby causing pandemonium Conclusion: Until the A96 route is determined irrevocably and unless builders are prepared to pursue Items 4 & 5, all talks with them should be discontinued and the whole concept of development on Nairn South shelved.

Allocated to	Nairn	General	General	
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Customer Number	01202	Name	Mr And Mrs Nicolson	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph	4.36, 4.37	
Reference	NA8, NA10		Type	Change	Comment Late No

Comment Changes

(1) Modify paragraph 4.36 to reflect the longer term development potential of the Househill Mains option. (2) Modify paragraph 4.37 to reflect the prospect that an interchange junction for the A96(T) and A939 would provide vehicular access to the Nairn bypass. (3) Possibly modify the text in NA8 to indicate the requirement to connect to the proposed A96 (T) bypass. (4) Include a new Mixed Use allocation NA10 (long term) to cover the main part of Househill Farm, the cemetery extension site (currently NA10) and land for playing fields/open space adjacent to the river. Refer to attached plan. List requirements in line with other allocations. (5) Extend the SDA boundary to include the requested land allocation and the Grigorhill Industrial Estate.

Representation

Our clients, Mr & Mrs Nicolson, own and work Househill Mains Farm on the south east side of Nairn. In recent years they have diversified through the development of business uses in the traditional farm steading which could potentially act as a focal point for further related activities and a neighbourhood centre for new housing. Other parts of the farm are limited by the risk from flooding from the River Nairn, at least one of the potential routes of the Nairn bypass/A96 dualling and the demand for additional cemetery space. Other land at Newmill, south west of Auldearn, is part of the farm business unit and is shown in the latest Transport Scotland consultation to be affected by a few of the many bypass/dualling options and potentially carve a significant route through that area. These factors would see the workable area of the farm diminished and with it the farm viability. Our clients therefore see a limited future for the continuation of farming at Househill Mains and are willing to make most of the land available for development. The future development potential of a large part of the farm, the land above the flood plain, was indicated in the Main Issues Report (MIR) as Mixed Use development site MU6 together with land for Community uses C1 and C3. Sites MU6 and C1 were “preferred” and as such, our clients supported their prospective allocation in the Proposed Plan. They were therefore disappointed to learn that most of this land, with the exception of the cemetery extension land, was not subsequently included in the Proposed Plan. It is felt that in doing so the Council has not considered their submission consistently with others for sites in Nairn and across other settlements in the Plan area. As such, we now object to the exclusion of the land previously outlined in the MIR and in our relevant submission. Our clients appreciate that there a number of other large scale Mixed Uses site options around the fringes of Nairn, many of which have been included. However, the potential development of the Househill Mains land seems less constrained than most of these options. We refer to the attributes of the land we indicated in the submission made at both the Call for Sites and MIR stages and we again ask that these be taken into account. Of greater significance in this regard the Househill Mains land is better connected to the existing main road, public transport and path networks to the north than the Nairn South allocations H8 and H9. It also seems to have the best prospect of achieving an access from the future Nairn bypass at the intersection of the A939 road, wherever that junction might be in future. In this regard representations continue to be made to Transport Scotland seeking clarification on the route options and impact on the Househill Mains land. The Proposed Plan now only includes the following parts of the farm within the Settlement Development Area (SDA): - (1) Land for a cemetery extension south west of Granny Barbour’s Road at Grigorhill, under NA10. (2) The lower north western fields between the river and the A939 road, but with no designated use. The latter area was previously “preferred” for community use (park/playing fields) in the MIR. The field to the east of the road is now treated in the same way as the land to the west, having previously been open space in the MIR. Surprisingly, the Plan now includes land and woodland to the south of Househill in a different ownership, which was not previously included in the SDA. In responding to our previous MIR submission the Council state that “MU6 would require major road improvements to the access to the site with any development, including that prior to the development of the by-pass,” and “will require a Transport Assessment to support the principle of development in this location.” This seems acceptable and reasonable but we note that a similar response and requirement is not made for the allocated land at Nairn South. This is despite poor access to the main road network, which was one of the main concerns of the local community that subsequently led to refusal of the planning application for 319 houses etc. If this refusal is sustained it will take a significant number of houses out of the supply equation until the Nairn bypass is completed and can provide access to the land. In this respect we consider that Househill Mains would be well placed to deliver housing and “also has potential to deliver a range of other uses”. The response to MU6 continues: “This site may have potential for development to serve the growing needs of Nairn in the longer term but this would be beyond the timescale of the Plan. Therefore it is considered that this site should not be brought forward to the Plan as an allocation.” However, this conclusion does not transfer through to the text of the Proposed Plan, unlike for similarly considered land at Tain and Tore. This and the fact that site NA9 Nairn South (long term) does appear as an allocation in the Proposed Plan smacks of inconsistency not just between settlements but

within Nairn itself. In view of the above matters and the previous indication of the Househill Mains land as a “preferred” site in the MIR, at the very least we request that it is included within the Proposed Plan in the same way as most of the land at Tornagrain, Tore and Nairn South NA9 are represented, i.e. for longer term development. Development on the east side of the river will also give more balance to the distribution of land allocations and be closer to existing sources of employment at Balmakeith and Grigorhill. The Househill Mains land had previously been excluded from the Highland wide LDP debate because the Council considered that potential allocations to the west and south west of the town would be more accessible to the main A96 Growth Corridor. However, accessibility between Househill Mains, the strategic road network and across the whole of Nairn, both pre- and post- bypass construction, will potentially give it an advantage over Nairn South. Inclusion of land at Househill Mains will also help deliver playing fields and other community uses in association with development on the east side of the River Nairn. The land for expansion of Tore is identified for development post 2021 subject to a developer preparing a master plan in advance of this date to support its inclusion in the next Local Development Plan review. This outlines an extensive list of criteria which the developer/landowner needs to consider in the preparation of a master plan. We feel that this approach could equally apply to the Househill Mains land giving the opportunity for prior development of allocated land at Sandown, Lochloy and Delnies. Hopefully in the interim Transport Scotland will confirm the route of the Nairn bypass and access to it, which together with an allocation for Mixed Uses will help our clients plan ahead with more certainty for the future management of the farm until such time as it is developed. This includes accounting for the possible early loss of the existing solitary allocation of the cemetery extension land (NA10 Grigorhill). In the setting out the requirements to be included in a master plan the Council should also clarify whether there is a need for a new primary school in the Househill Mains area. To help illustrate the above we attach the following: - (1) Proposed Plan Inset Map with extent of land outlined. (2) Househill Mains Framework Plan as amended.

Allocated to	Nairn	General	General	
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Customer Number	04354	Name	Michael Green	Organisation	
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Agent Name amd Organisation (if applicable)		
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Section	4.Development Allocations	Paragraph	4.34
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Reference		Type	Support	Comment Late	No
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Comment Changes

Representation

Regeneration of the Nairn Town Centre is essential and is the second priority for Nairn after the Bypass. I would put adherence to the Town Centre First policy as the guiding mantra for all development around about and in Nairn.

Allocated to	Nairn	General	General	
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Customer Number	04104	Name	Des Scholes	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	Nairn sites		Type	Change	Comment Late
				No	

Comment Changes

The development allocations for Nairn are simply OTT. In the light of the refusal of Highland Council in September to grant planning permission to the South Nairn development these plans should be revised immediately in the light of the Council's realisation that areas of Nairn cannot cope with traffic flow. I would particularly suggest that any Call for sites submissions be reexamined (particularly any traffic assesments accompanying them) and a more sober plan more in line with the current economic climate be produced.

Representation

Please see above section. Further to this I wish to strongly object to the proposal to put houses on the Showfield in Nairn. This would be an unacceptable trade off for a piece of common good land in Sandown. Nairn has to keep its established green spaces.

Allocated to	Nairn	General	General	
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Customer Number	03642	Name	Grainne Lennon	Organisation	Scottish Government
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Para 4.37	
Reference	Site NA9 Nairn South		Type	Change	Comment Late
				No	

Comment Changes

Page 64, para 4.37: Amend the text... "Longer term development options at Nairn South are largely dependent on the provision of a vehicular access to the proposed A96 trunk road bypass" to read... "Longer term development options at Nairn South are largely dependent on developers agreeing and delivering suitable improvements to the local road network". Page 67, Site NA9 Nairn South (long term) table, remove the text... '... identifying requirement for linkages to the proposed A96 (T) bypass'

Representation

Previous TS comment: An appropriate access strategy taking into account the cumulative impact of the various development opportunities should be discussed and agreed with Transport Scotland. It would be expected that existing junctions will be used to access the proposed sites. Additional Comment: The Nairn Bypass options recently presented to the public did not allow for a junction in close proximity to sites identified as NA8 and NA9. Reason - Given the policy position set out in SPP on access to the trunk road network and the alignment options and junction strategy being considered by Transport Scotland for the Nairn Bypass, the developments at Nairn South cannot be dependent upon taking access directly from the new trunk road.

Allocated to	Nairn	General	General	
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Customer Number	01031	Name	John Gordon And Son	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	NA8 and NA9		Type	Change	Comment Late
				No	

Comment Changes

Summary only, elaborated at Section 5. The IMFLDP should: (1) reaffirm that any allocation of land is subject to consideration of transport and infrastructure and any first phase should not exceed 250 units (NA8/9); (2) reflect Transport Scotland confirmation that a by-pass access to Nairn South is feasible in principle, specify grade-separated form at developer expense, and requirement to serve the sawmill (NA8/9); (3) state any future allocation of land or planning application to be subject of a structural open space review; the deliverability of any such facilities to give added separation to the sawmill; and confirm this as an action for supplementary guidance (NA8); (4) specify “a 20-30m set back of development from Balblair Road” (NA8/9); (5) state “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill expansion area to be provided by developers should be a minimum of 35m-wide” (NA12).

Representation

Ground of Objection Our client has participated fully in the Local Development Plan, the Nairn South Strategic Masterplan including in the “collaborative approach between all interested parties” the Council has promoted, and in the planning applications (11/04355/FUL) and (13/01276/PIP). Their interests are referred under the PLDP reference “INDUSTRY NA 12 Sawmill Expansion”, but are not adequately represented in that regard. The future of the sawmill is affected by development at Nairn South. This objection is to the PLDP provisions relating to NA8 and NA9. This objection should be read in conjunction with objections to NA8 and NA12 on behalf of John Gordon & Son. The Council is therefore fully aware of the critical impacts and potential conflicts that development at Nairn South poses for the future of the sawmill and the economy of Nairn. It is absolutely vital that appropriate provisions are made to safeguard the sawmill and its potential for development. Critical to this are (1) the operating effects of the sawmill, at present and as part of the proposed expansion, and the requirement on developers/landowners at Nairn South for an appropriate buffer, separation distance and noise attenuation measures; and (2) the need for developers/landowners at Nairn South to deal appropriately with the transportation requirements of the sawmill as an existing, long established strategic land use. In the light of two planning applications affecting land at Nairn South [one refused (11/04355/FUL) and one to be determined (13/01276/PIP)]; our client lodges the following grounds of objection to the PLDP. Nairn South (NA8 and NA9) Phasing and Transport

1. Land at Nairn South is phased 520 homes short term and 410 homes long term in the Inner Moray Firth Local Development Plan (PLDP). The same land in the Highland-wide Local Development Plan is phased 330 short term and 600 long term.
2. This phasing is controlled by the capacity of the existing road network that strictly limit (according to policy as set out in the HWLDP) a first phase to 250 houses. However, 520 houses as a first phase (as expressed in the PLDP) appears to set that policy and the decision recently to refuse a proposal for 319 houses (11/04355/FUL) for reasons relating to the capacity and capability of the local road network, aside.
3. There is no explanation for the serious discrepancy between the Council’s policy as referred in the HWLDP and as referred in the PLDP, in which provision is made (in the latter) to more than double the size of a first phase development at Nairn South; or the discrepancy between the policy in the PLDP and the Council’s decision to refuse planning permission for 319 houses.
4. The PLDP should reflect that decision of the Council to refuse; the land should not be allocated. That is the essence of the HWLDP (the development plan as approved in 2012) ie. that the allocation of land at Nairn South is subject to consideration of transport and infrastructure. It is not inconceivable that a further current planning application for 250 houses (13/01276/PIP) could be refused also. It therefore remains that if a “first phase” is to proceed, it needs to be found to be deliverable ahead of a new access to the A96(T) by pass. That is not proven and the PLDP is presumptuous in assuming that it can be.
5. The PLDP should be realistic and informative about the timing of a by-pass and - in the context of the limited options for strategic junctions to the A96(T) under consideration by Transport Scotland - that access to the by-pass is feasible at Nairn South, and can reasonably be sustained at developer cost (bearing in mind that these would already by dint of policy, include a pedestrian crossing of the railway and upgrading of the local road network, amongst other contributions). With a view to improving the accessibility of the business, John Gordon & Son has made representations to Transport Scotland in respect of its position as a significant traffic generator and an established existing user, as distinct from a developer from whom contributions might be sought
6. Further to the declaration in the PLDP para. 4.37 that “longer term development options at Nairn South are largely dependent on a vehicular access to the proposed A96(T) by-pass” the discrepancy above is placed in perspective by the HWLDP that anticipates 680 houses would require access from the proposed by-pass; and by the PLDP which reduces that critical mass to 420, ie. by almost 40%. The PLDP presents no justification for any of this or the implications it brings for added pressure on the existing road network linking Nairn South to the town centre

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.

which caused refusal of 11/04355/FUL. 7. The phasing, scale and timing of development at Nairn South has particular significance for John Gordon & Son because these determine (1) the positioning and proximity of future residential (or other occupiers) in relation to the sawmill expansion area; (2) the extent of a “buffer area” (see objection to NA8) and the magnitude/intensity of potential future complaint; and (3) the capability of a later (longer term) phase of development to support a connection to a by-pass and thus a substantive improvement in access to and from the sawmill. 8. In that regard, the allocation of land at Nairn South for mixed uses but primarily housing (and any planning permission that would derive as a result) will have a profound impact on the sawmill, by defining its potential for expansion per se and land-locking the site for all time; thus allowing no further scope for expansion beyond the present allocation of 5.1 ha. (NA12). The risk to the sawmill operations and expansion intensifies with the commencement of development at Nairn South. As a result, the development plan is crucial in establishing the terms that inform the location and proximity of development at Nairn South (see objection to NA8 paras. 7-10). 9. The above factors would justify a review of the principle of an “allocation” at Nairn South and any phasing of it, since the PLDP is intended to reflect the availability of land and deliverability of development. In light of the refusal of planning permission (11/04355/FUL); the Inner Moray Firth Local Development Plan should be assimilating the implications of that decision. If Nairn South cannot reasonably be delivered to the extent and in the terms the development plan intended; then the land should not be allocated. In any event, the policy provisions for development, phasing and access/transport at Nairn South in the Highland-wide Local Development Plan and in the Inner Moray Firth Local Development Plan are not coherent or consistent with the aspirations that Nairn South is served from an A96(T) by-pass. The viability of a major allocation for expansion (short or long term) at Nairn South, deserves much closer scrutiny and may have no place in the development plan at this time. Recommendation: In view of the integration of the Nairn South provisions NA8 and NA9 with one another and the A96(T) by-pass and their implications for the sawmill (NA12), the following recommendations arise from the objections lodged on behalf of John Gordon & Son in relation to NA8 and NA9 and the representation in relation to NA12; each is applicable as relevant to the appropriate PLDP allocation: (1) In accordance with the Highland-wide Local Development Plan any provision within the Inner Moray Firth Local Development Plan should recognise that the allocation of land at Nairn South is subject to consideration of transport and infrastructure; and that the unexplained increase in a first phase of development from 250 to 520 units should be corrected in that context and explained in relation to aspirations for an access to Nairn South from an A96(T) by-pass (see (2) below). (2) In view of the decision to refuse planning permission for (11/04355/FUL), any phasing plan for land at Nairn South should be subject to: (a) shared understanding with Transport Scotland that an access serving Nairn South is feasible in principle and clear specification given in the development plan of the grade-separated form of any A96 intersection at developer expense; and that; (b) that principle takes into account the consideration to be given by Transport Scotland to the access requirements of the sawmill (as invited by Transport Scotland). (3) In view of the decision to refuse planning permission (11/04355/FUL); the recommendations (1) and (2) above and the objectives of the Highland-wide Local Development Plan and the Strategic Masterplan in relation to “a buffer area” and residential amenity, any future allocation of land at Nairn South or planning application should be subject to a review of the requirements for structural open space (playing fields) in the context of major growth proposals for the town as a whole; the deliverability of any such requirements on land at Nairn South in view of the added separation (ie. beyond a 35m wide dedicated earth-bund) that could afford to the sawmill and future residents; and that that should be an action the planning authority will undertake and publish as supplementary guidance as necessary. (4) In view of the inadequate attention given thus far to Balblair Road, the development plan should state (NA8/NA9) that “a 20-30m set back of development from Balblair Road in the interests of residential amenity and any requirement for upgrading that route, will be sought as part of any proposals”. (5) The Inner Moray Firth Local Development Plan should follow the provisions in the Highland Wide Local Development Plan and the Nairn South Strategic Masterplan, and reference should be specifically made to avoiding any potential impact on the expansion of the sawmill. In that regard and in view also of the decision in relation to (11/04355/FUL) and the recommendation therein; NA8 “Requirements” should also state “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill to be provided by developers should be a minimum of 35m-wide”.

Allocated to	Nairn	General	General	
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Customer Number	04204	Name	Jeff Baker	Organisation	The Association of Nairn Businesses
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32-4.41	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Employ principle of town centre first policy and restrict any further retail development at Sainsbury's.

Representation

This document is a preliminary response by the Association of Nairn Businesses (ANB) to consultation on the Inner Moray Firth Development Plan. Since the consultation was first sought, it now seems likely that there is to be a “Charrette” in Nairn. In the light of this, the ANB reserves the right to make further representations when the charrette has been completed and after the ANB and its committee has had time to discuss the outcomes and formulate any new proposals. It is now recognised (Katie Briggs, 19 November, 2013) that the ANB will in future be treated as a stakeholder under item NA7 of the plan. Effects of the Plan Upon Nairn Businesses Our responses will be limited to items which are likely to affect our member businesses and will not be confined to the town centre (site NA7) Community and Enterprise in Scotland’s Town Centres The ANB supports the principles and aims of the report to the Scottish Government of the External Advisory Group, chaired by Malcolm Bruce and published in July, 2013. Town Centres First The evidence that out of town retail development continues to have a disastrous effect upon town centre shops is overwhelming and Nairn is no exception. The number and quality of Nairn High Street shops has fluctuated over recent decades with cycles of empty shops being taken up by new businesses which then turn out not to be viable, leading to a fresh wave of vacant premises. The principle of “Town Centres First” should be paramount in the Highland Council planning process and out-of-town and edge-of-town retail planning applications should be subject to the closest scrutiny in order to minimise the effect upon town centre businesses. Of particular concern in Nairn would be any move to increase the number and variety of new retail outlets which might be proposed as a cluster around or near the Sainsbury’s store on the Eastern edge of the town. We believe that any such future application should be turned down and that any lapsed existing consent should not be renewed. Car Parking Free car parking for up to two hours in central locations is paramount to the viability of town centre businesses. Signage on the A96 indicating that car parks give access to the High Street will encourage motorists to stop in Nairn and combined with easy direct pedestrian access to the town centre this will improve retail footfall. Residential Development A vibrant town centre retail environment requires footfall. Whilst the ANB recognises that there is strong local opposition to further residential development in and around Nairn, we consider that significant increase in the number of homes within Nairn can only enhance the quality and number of businesses which can survive in Nairn High Street. We recognise that existing out of town developments will continue to attract a proportion of Nairn residents but increased population will inevitably benefit the vibrancy of our town centre retail area. We realise that there is strong opposition to developments South of Nairn. Objections to developments at Nairn South are widely predicated upon the inadequacy of the road structure. Improvements to the Cawdor Road route into town are possible and should be more closely investigated. When the Nairn bypass comes to fruition, every effort should be made to provide a link from it into the town centre via Cawdor Road and Nairn South. Town Centre Living There are a number of buildings with residential potential within Nairn town centre which are currently unoccupied or under-occupied. The quality of some of the buildings reflect the popularity and prosperity that Nairn enjoyed during the earlier parts of the last century. The exteriors of some are clearly in a poor state of maintenance but such deficits may be largely cosmetic. Ground floor living in former shops is likely to seem unattractive but there are buildings where this would not be the case and there are certain to be higher storey spaces that can be converted to residential use There is great potential for some of these buildings to be brought into residential and other community uses and steps should be taken to encourage this. In particular owners should be made aware of any financial grants which may be available and that there are UK government tax breaks available that make conversion from business to residential use a very attractive proposition. Transport The long awaited Nairn Bypass if it ever comes to fruition, can only benefit Nairn as a whole and in particular, enhance the experience of parking and shopping in Nairn. Junctions between the bypass and the A96 to the West and East should be of a design which makes it clear that they form a gateway into the town as well as easing the experience for through traffic. Currently, the volume of traffic and the controls upon it required to promote road safety are a discouragement to visiting Nairn. Allowing traffic which has no intention of stopping in Nairn to proceed rapidly on a bypass will enhance the experience of those intent on visiting the town and using the facilities of our town centre. Business Development and Employment Nairn is in a beautiful and in some ways unique geographical position. It is well served by its transport links, particularly as the closest town to Inverness Airport. Steps should be taken to publicise the assets of Nairn with the aim of encouraging the migration of significant businesses to our town. The appearance of new businesses with larger workforces will justify new residential development and enhance the viability of town centre retail and catering outlets. Community Enterprises Nairn has an excellent and well used Community and Arts Centre. There is however, potential to use town centre buildings as venues for additional community recreation,

education and enterprise activities. Highland Council planning processes should take account of and encourage this form of development. The Future The Association of Nairn Businesses seeks a brighter future for this town. In the short term, we wish to halt the decline in the number and quality of businesses in our town centre. We see the immediate path to achieving this being the arrest of out of-town and edge-of-town retail development. No Nairn resident would welcome the prospect of one third fewer businesses in the centre of our town. In the medium term, we see increased residential development and enhanced transport infrastructure as the catalysts to a more vibrant town centre. In the long term, we wish to see Nairn become a destination of choice for shopping and tourism visitors. Town Centres First We make no apology for repeating that we believe that the Highland Council planning processes should be firmly guided by “Community and Enterprise in Scotland’s Town Centres” and its key principle of “Town Centres First”.

Allocated to Nairn General General

Customer Number 04242 Name Murial Greig Organisation

Agent Name amd Organisation (if applicable)

Section 3.Strategy for Growth Areas Paragraph

Reference Type Change Comment Late No

Comment Changes

2,000 houses to go up,without new roads ,additional Dr./dental/schools is ridiculous. Already we are overstretched ,waiting times are terrible. You cannot just throw up houses and bring +/- 6,000 people in without addressing our ,already, hopeless roads and services. For Farmers Field ,see below.

Representation

Re Farmers Field and building houses there with NO NEW ROADS - the tiny Lodgehill Road would have to be used (no pavements on that side) going into West bury ,also tiny and with a terrible junction at its Cawdor Rd. end OF 5 ROADS where there already terrible traffic jams. AND it is used by ambulances going to and fro from the hospital AND by Fire Engines also rushing down to fires. We can hear their sirens going all the time as they try to get through and you are creating a potential disaster with talk of more houses and people in this already overstretched area. ALSO, the people of Nairn wish to keep their few GREEN AREAS and Farmers Field is well used. You should :- 1. See about taking some of those stupid traffic lights that are cluttering up the main road and resite some on that dangerous junction of Cawdor/ Westbury/Millbank / Station roads. 2. Get our Bypass first before thinking of any more schemes here - our town cannot stand to have any more people/ traffic without attention to our infrastucture and services. AND without destroying our green spaces.

Allocated to Nairn General General

Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Nairn	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

Housing. The should be a limit of 15 houses being built on any one development site in Nairn in each year and a total of 25 houses in Nairnshire as a whole. This is to allay fears of the community being swamped by housing and gives a greater opportunity for local employment

Allocated to	Nairn	Housing	HousingPop	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	paras 4.32 to 4.41 and site list	
Reference	NA1 Farmers' (not Former!) Showfield	Type	Change	Comment Late	No

Comment Changes

EITHER (a) removal/deletion of the site NA1 from the list of housing allocations entirely; OR (b) rewrite to identify the exchange (excambion) of the land for a portion of the Sandown Common Good Land sufficient for a new Showfield as the preferred option, with the existing Showfield being taken into the Common Good as a community asset and retained as green space for continued recreational and amenity use as at present.

Representation

The site is one of the few remaining significant green spaces within the town. It is extensively used for recreation, is an environmental asset and a "green lung" within a residential built-up area. It is not suitable for housing. Access is constrained by a trunk road and by adjacent residential streets which already have capacity and safety issues. The modest gain of up to 30 houses (only some 1% of the projected total required) does not justify the loss of a major part of one of only four or five urban green spaces left in the town(Viewfield, the Links, the Maggot/Riverside and Tradespark Wood being the others). The excambion proposal depends on the willingness of the parties concerned to negotiate constructively; but it does offer a way to a solution which could satisfy all concerned.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number 04193 Name Jane Patience Organisation

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph

Reference NA1 former showfield east Type Change Comment Late No

Comment Changes

removal of allocation NA1 - 30 homes

Representation

I am against the building of up to 30 homes on the former showfield east. I feel this is a high density of homes within the allocated area & not in keeping with the surrounding streets. There is enough new houses being built within the Nairn area, whilst there are new & old houses for sale, some have been for sale for years. As Nairn is a country town, the public, tourists & visitors should enjoy & benefit from the green spaces in the town.

Allocated to Nairn NA1 Former Showfield East

Customer Number 04264 Name Brian Cruickshank Organisation

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Parag no. 4.32 land allocation Ref NA1

Reference Ref NA1 Type Change Comment Late No

Comment Changes

Removal of the proposed Development of East Showfield as an area for building 30 houses. No houses to be built in this area for reasons stated in Section 5

Representation

Objection to Proposed Development of East Showfield, Nairn, for the building of 30 houses. Reason 1. Loss of amenity. I lived and grew up in a house in Lodgehill Road directly opposite the Farmer's Showfield in the 1950's and 1960's. I still visit Nairn regularly and stay in this house. While I was growing up, the field was used as a play area for many schoolchildren living in the nearby vicinity, along with the secondary use by pupils of Nairn Academy, for football , hockey and the annual school sports day,when the Academy was located in the town centre. The reduction of a green field site and exercise area will be detrimental to both children and adults, with no alternative large green space in the immediate area. The remaining proposed football area is insufficient and, from personal experience, the pitch is not level ! Reason 2 Traffic Congestion Even in the 1950's and 1960's there were regular mentions of proposed major by-passes for the the A 96 but nothing ever materialised, other than improvements to King Street and, eventually the Auldearn by-pass. In June 2005 there was an A96 Corridor Master Plan which has now been replaced by the Highland Council's new plan, so it is natural to be sceptical about any proposal for a by-pass to reduce traffic congestion when it never materialises. The 30 houses proposed will result in greatly increased traffic for Lodgehil Road. This is one of the main access routes for schoolchildren travelling to and from Nairn Academy and will thus increase the risks of accidents to them. Reason 3 . Development blocked in perpetuity. My grandfather , Donald Munro, farmer, Winewell, was a contributor towards the purchase of the field and I believe told my mother that the terms of purchase were that no development of the field was allowed in perpetuity. On this basis it would appear to be illegal to develop this site. .

Allocated to Nairn NA1 Former Showfield East

Customer Number	04271	Name	Scott Johnstone	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA1	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

I feel that the 30 house zoning of Nairnshow Field will mean the loss of a treasured greenfield site at the heart of Nairn. There is also a historical covenant that the land should not be built upon and I think zoning would causing legal action for future development. Finally, there is no shortage of land around Nairn that is already being developed or included in the IMFLDP that could be used for the thirty houses proposed here.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04317	Name	Ferdinand Maylin	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Farmers Showfield Nairn	
Reference	NA1	Type	Change	Comment Late	No

Comment Changes

I would not like to see any house building on the Showfield.

Representation

I reject strongly to the removing of this valuable green centre in the middle of Nairn. Its openness is a source of much use and benifit to the community. The outlet of Lodgehill Road leads onto the two worst cross roads in Nairn. Lodgehill Road/Wellington Road. Cawdor Street/Cawdor Road. Lodgehill Road is swarmed with school children three times a day during the week.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04388	Name	David Vass	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41 Nairn Showfield - house building	
Reference	NA1		Type	Change	Comment Late
					No

Comment Changes

I wish the building of houses in this green space to be prevented.

Representation

I do not wish to see this green space in Nairn town center eroded or depleted. It is a public amenity, used consistently and enjoyed by all. There are several other areas ear marked for housing which do not involve the loss of green space public amenities in the town center. They should be used instead.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04391	Name	Alexander Webster	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	N1		Type	Change	Comment Late
					No

Comment Changes

N1 should not be zoned for housing development.

Representation

The needs of the community Unsuitability of access and transportation Road safety concerns Planning history

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

The showfield should remain untouched, and left available for recreational use. The loss of green space should not be allowed, in particular that this was gifted to the community. An agreement should be to the Farmers Society to exchange this as community land with a site in Sandown

Representation

Loss of Green Recreational Space Little practical gain in housing Additional traffic on the already busy Waverley Rd,

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

no housing on showfield NAIRN.

Representation

NO HOUSING ON SHOWFIELD

Allocated to

Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 to 4.41 and site listings pp 64-67	
Reference	Site NA1 - Farmers' Showfield		Type	Change	Comment Late No

Comment Changes

Removal/deletion of Site NA1 from the list of sites allocated for Housing. (NB the title is the FARMERS' Showfield, not the "Former" Showfield); and more explicit provision in the narrative text and in Site NA4 (Sandown) for the option of an excambion (exchange) of this site for a sufficient part of the Sandown Common Good land to permit aestablishment of a new and adequate showfiled.

Representation

This is a supplementary representation additional to the agreed comments on various elements of the IMFLDP already submitted separately on behalf of the three Community Councils of Nairn. It reflects views expressed by local constituents/residents to Nairn West CC at a recent open meeting. The key points, and reasons for seeking removal of the allocation of part of this site for housing, are: 1) the whole site is important and valued green open space. It is part of the town's history, and one of the few major remaining green areas within the main part of town. It is extensively used for recreational purposes by local sports groups and individuals. It is an environmental asset - a "green lung" - for the surrounding residential area and for the town. 2) There are understood to be conditions or covenants associated with the title and related to the sale of the transfer of the land from the Newton Estate (Finlay) to the Nairn Farmers' Society. These conditions are said to forbid any "development" of the land for housing or similar purposes without the consent of the previous owners or their heirs and successors. 3) the past planning history of this site (there were previous development bids and a public inquiry), and previous planning debates and outcomes, are relevant to any proposal to zone the land for development in the future. 4) the site is considered unsuitable and inappropriate for housing development principally because of access issues and the adverse impact on adjacent streets. The A96 to the west is a busy trunk road. Access from the south (Fraser Park/Tulloch Drive) would be difficult. Waverley and Lodgehill Roads (to the N and E) are residential streets already seriously affected by traffic problems, the former a bus route and used for A&E access to the hospital, the latter carrying large volumes of vehicle traffic and pedestrians (children) going to and from the nearby school. An additional 30 houses is significantly higher density than the surrounding area. This could not fail to have an impact on the adjacent streets and junctions. 5) development of part of the site would deliver a very small gain in housing stock (up to 30 is a mere 1.2% of the stated requirement of 2500) for the sacrifice of a major part of one of the few significant areas of open green recreational space within the town. The loss of amenity to the whole community would be far greater than the gain in housing, and therefore disproportionate. Preservation and protection of this green space is prescribed by, and would be consistent with, SPP and the specific goverment guidance in "Designing Places", in PAN65 "Planning and Open Space", and the "Green Infrastructure" Design Guidance. If all parties can agree, the option of an exchange of this site (bringing it within the framework of Common Good) for a part of the Sandown lands sufficient for a new Farmers' Showfield would be an imaginative way of preserving the green spaces while still meeting the need for the Farmers' Society to have an an asset which provides an adequate site for their Show - which is itself a part of the Nairn community's heritage and recreation.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number 04216 Name Brian Stewart Organisation Nairn West, River and Suburban Community Councils - joi

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Nairn - para 4.32 et seq

Reference Site NA1 - Farmers' Showfield Type Change Comment Late No

Comment Changes

Page 64, table entry for Site NA1 - (PREFERABLY) remove entirely from IMFLDP, OR ALTERNATIVELY, rewrite entirely to read: “The preferred strategy subject to the willingness of all parties concerned, is an excambion of the land at this site for Common Good land of equivalent value at Sandown sufficient for a new show venue, with the present Showfield site then becoming a Common Good asset (with the objective of its retention as green space for the benefit of the community). Should such an agreement not prove possible, the alternative would be development of part of the site, tied to the retention of the remainder of the traditional Showfield as open space. Alignment of housing or other development needs careful consideration to ensure no adverse impact on existing nearby streets, and any development is subject to provision of adequate access, footpath improvements, assessment of the cumulative impact on the road network and no adverse impact on the IMFSPA/Ramsar.”

Representation

For explanation and confirmation of requested amendments, see attached composite note of comments, in particular the section headed, THE FARMERS' SHOWFIELD (NA1) This long-established open site is highly valued by the community as a recreational amenity. There is a strong belief that – given the scale and volume of housing already approved and allocated around Nairn – the allocation of half of the field to provide only an additional 30 houses is a disproportionate loss of green space for a minimal gain in housing stock. The predicament of the Farming Society is however recognised. The site is their principal asset but is no longer viable as the show venue. They need either to realise the value of that site or – if possible – to find some other way ofacquiring an alternative showfield in return for the present one. The option of a negotiated exchange (excambion) of the existing Showfield for a suitable part of the Sandown Common Good land (as mentioned in the Site NA1 table) would be a no-cost win-win for all parties. Making the Showfield over to the Common Good would enable it to remain a community open-space amenity and asset benefiting the people of the town, while the provision in return of an area of the Sandown Land of equivalent value and appropriate size to the Farmers’ Society would deliver a new show venue and asset to the Society. This would also offer scope for a football pitch and other facilities there and would be compatible with the continuing use of the Common Good Sandown Land as a community asset. It is therefore proposed that the current zoning of the Showfield for development should be removed from the plan, on the basis that the preferable alternative is a excambion arrangement, negotiated between the Farmers Society and the Common Good trustees, for part of the Sandown land. This should be identified and pursued as the preferred option in the Local Plan. Only if such an option proves unattainable should part of the Showfield site be allocated for development. Any such development, if contemplated, should be located so as to ensure no adverse impact on Lodgehill/Waverley Roads – which points to alignment along the southern boundary facing Fraser Park.

Allocated to Nairn NA1 Former Showfield East

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

That the Farmers' Showfield in Nairn (Site NA1 Former Showfield East) should not be zoned for development.

Representation

I wish to comment on the possibility of housing development at the Farmers' Showfield in Nairn (Site NA1 Former Showfield East). Such development would deprive Nairn of badly needed green space, which is highly valued by the local community for sport and recreation and as a 'breathing space' for an increasingly developed and populated town. It is also said by people with long family histories in Nairn to run counter to the 1920s covenant under the terms of which the Farmers' Society originally acquired the site. Development at the site would also be inappropriate in that it would exacerbate the traffic problems particularly at the already dangerous junction of Lodgehill Road with Waverly and Westbury Roads which is on the walking route for many pupils attending Nairn Academy and Rosebank Primary School. The possibility of a potential excambion of land ownership for land at Sandown for a new showfield should be seriously considered.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

I would like to express my objection to the development of the show field in Nairn, site reference NA1

Representation

This green area is of great importance to the young people of nairn

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

that it should not be used for development, but left as a green area for recreation.

Representation

Nairn citizens

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Retain former Showfield as green open space.

Representation

It is important for communities to have areas of green open space. This Showfield is an important green open space for Nairn. If developed it would be lost to the community forever. These spaces benefit the whole community. They should not be sacrificed.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

NA 1 This area is used for recreation and should not be developed. It might be possible to enhance this area with a small development. Nairn Community Councils should be consulted if you wish to look at this option.

Representation

The Lodgehill Road is already a high risk School Route and extra traffic in this area should be avoided.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Cancelled

Representation

Loss of green field site.Building 30 houses exiting on to Lodgehill road then to crossroads at Waverely Road is adding far to much traffic to a very busy crossroads which caters for 3 schools and 2 nurserys this road is also main access from west side of Nairn to doctors surgery and Nairn hospital.Football pitch would have to be shifted they would also need room for training on Tuesday and Thursday as training on pitch would ruin it.Parking on Saturday 30th November 29 cars parked on field and 1 bus from visiting team on Lodgehill road.

Allocated to

Customer Number	04392	Name	Shona Wescott	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA1 Former Showfield East		Type	Change	Comment Late
				No	

Comment Changes

No houses to be built on this site

Representation

This area should be kept as a green space, and continue to be used solely for the purpose of leisure as it is now, any development should be for a better play park. Lodeghill Road is a busy thoroughfare for cars and school pupils, ending in a very dangerous junction onto Waverley Road which certainly does not need any more traffic. I would like a better explanation of what is described as Improvement of footpaths too, this is not at all clear from description or maps? I say again there is little enough green space in the centre of Nairn as it is, this area should not be used for housing.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04499	Name	David McLean	Organisation	Save our Showfield
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1 - Nairn		Type	Change	Comment Late
				No	

Comment Changes

Removal of site from the Plan & retention of greenspace

Representation

We are writing to you as office bearers of ‘Save our Showfield’ – a group of people who formed a committee in 1998 following great public concern regarding the proposed building of a supermarket on the showfield. Through local public support, with several public meetings, many letters of objection and over 3000 signatures on a petition to “keep the showfield green” we ran a campaign for 2 years and the planning proposal for a supermarket was rejected by a Scottish Office Reporter in 2000. We object to the present planning proposal of a housing development of the showfield for these reasons: 1. This is a valued green field space used by the public for general recreation where people walk their dogs, children play, as well as being the location of the Nairn St Ninian’s Football pitch. It is also in regular use as the location of car boot sales, a vintage car rally, a circus and is crossed by the public at all times. In 2000 it was noted that there was a deficit of 45% of available recreational land in Nairn. Since then the town has grown and so the deficit will now be greater. This space is a vital green lung for Nairn as it expands and a housing development would not only cause loss of this local amenity space, but also change the character of the town. 2. Viscount Finlay of Newton sold the field to the Farming Society in 1928 for £1000 with money paid by the Farming Society and public subscription. There is a restriction in the title that no house building will take place without the consent of Viscount Finlay or his descendants. In 1998 Lady Hays, his grand-daughter, was not willing to grant that consent and we see no reason why this will have changed now. 3. We consider the high density housing development now proposed for the green space is inappropriate and not in accordance with the existing surrounding houses in the area. What would be left of the field would be unsuitable for much of its current use, especially for football. 4. The Draft plan projects approximately 1900 new houses in 20 years. The removal of 30 from this total is not going to significantly affect the plan. 5. Our concerns are also for the detrimental impact such a development will have on the surrounding roads and as a direct result on the safety of pedestrians. The local residential roads - Lodgehill Road, Chattan Drive, Waverley and Westbury Roads are already struggling with the volume of existing traffic. There has been an increase in traffic flow since the relocation of both GP surgeries to the Nairn Hospital, and this, combined with the new Vet’s Surgery on Lodgehill Road and the existing traffic to the 2 local primary schools means that congestion is a problem as well as road safety. The junction of Lodgehill Road and Waverley/Westbury Road is particularly dangerous and of concern, especially for school-aged children. As Lodgehill Road itself ends in a cul-de-sac the quickest access to the A96 will be via Waverley Road. With the proposed development of houses there could potentially be up to 30-60 extra cars using this junction and these local roads, which are totally inadequate to cope. We are aware that the field is owned by the Nairnshire Farming Society, and we have members of the Society on our committee. If the Society should decide to relocate within the town we would be happy to support their relocation proposals, on the basis that the whole field remains green, and its amenity is maintained. This is supported by the Council’s own evidence stated in 2000 which emphasised the showfield’s importance as a structural open space derived from its use, its scale and position and as we have already mentioned, this is also within the terms of the existing legal title granted to the Nairnshire Farming Society in 1928

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04188	Name	Kathleen grant	Organisation	
Agent Name amd Organisation (if applicable)					
Section	3.Strategy for Growth Areas		Paragraph		
Reference			Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

I have lived adjoining the Nairn Showfield for over thirty five years. I wish to object to the proposed changes as outlined in the Inner Moray firth Proposed Local Development Plan for the following reasons: The field is a beautiful green lung to all the residents of the area. I have walked four generations of dogs in the field. As I get older and perhaps stop driving there is no suitable alternative nearby. It is our dear green space. Football played in the field is well attended and parking is required for all attending the matches. Youth football also takes place in the field. The children of the surrounding area use the field for playing all sorts of games. Many Mums take their toddlers around the field. The primary school use it for exercise classes in good and bad weather. Lodgehill road is used by pupils from Rosebank, Millbank and the Academy and the narrowness of the road with the increased traffic the thirty houses would generate must be a concern. It is also where the helicopter lands for uplifting medical emergencies. 2014 is the year of the Commonwealth Games to encourage sporting activities and here we are in Nairn digging up half of our beloved, well used, field to build houses!! The field would be greatly missed by all who use it. I strongly urge the Council to reject this proposal. [redact]

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04458	Name	James Somerville	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Housing		Paragraph		
Reference	NA1 former show field east		Type	Change	Comment Late
				No	

Comment Changes

Objection to any housing being built on former showfield east which is a cherished green area and used by any public and school children for recreation – no evidence to show any of the Council’s safeguarding of green areas here – it would be a great mistake to build (30) houses on this amenity space. The people in Nairn do not want to put houses in field.

Representation

MY MAIN OBJECTIONS AS FOLLOWS:- The Road (ie Lodgehill Rd) is not wide enough for more traffic and is inadequate for your purposes. The crossroads at junction of Lodgehill and Wester Road is already dangerous - it is an accident area. Ambulances already flash up and down Waverley Road on route to Nairn Hospital – also extra vehicle at new vet surgery. The health and safety issue has been ignored – 3 schools use Lodgehill Road regularly going to school. At lunchtime and again in the afternoon going home. It would interfere with infrastructure – inadequate drainage already exists. There are many other suitable sites for housing available in and around Nairn. I repeat again the people in Nairn want the site to stay green.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04142	Name	Allison Thomson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	Site NA1 Former Showfield East		Type	Change	Comment Late No

Comment Changes

I object to the proposal that site NA1 former Showfield East is given development status on 1.8 ha for 30 houses with the retention of the balance as greenspace accommodating a reconfigured equivalent football pitch.. It should be retained as a greenspace.

Representation

I object to the proposal that site NA1 former Showfield East is given development status on 1.8 ha for 30 houses with the retention of the balance as greenspace accommodating a reconfigured equivalent football pitch. It should be retained as a greenspace. The Highland Greenspace Audit 2010 identified the Showfield as having a primary land use as amenity greenspace. The Highland Council Nairnshire Local Plan (NLP) published 2000 and continued in force in April 2012 in Policies S2 par 10 (f) allocated 0.6 ha at the Showfield for 8-10 houses with a S75 Agreement to be obtained to secure the remainder of the Showfield as public open space. NLP par 31 also stated “the Council will safeguard the following additional structural open spaces which are integral to the town and its amenity: the Showfield (see par 10 f)..... and that improvement or upgrading of facilities or enhancement of these areas as community parks is encouraged.” The current proposal is to take away 50% of the Showfield as open space and build 30 houses on it. 3 times the space is to be allocated for building (1.8 ha instead of 0.6ha previously allocated in the NLP 2000, continued in force 2012.) The Showfield is a high quality, safe, open, well maintained greenspace and is therefore well used. It provides the setting for a wide range of social interactions and pursuits that contribute to the amenity and character of Nairn and is of high community value. The current football pitch has permanent sturdy wooden posts and rails to keep people off the pitch. If half the Showfield were built upon and the current pitch and pavilion were relocated to the remaining half there would only be about a 20 m strip left round the resited pitch for all the other activities that take place on this open space. The size of the retained part of the Showfield does not allow sufficient space for the vast amount of differing activities carried out on the Showfield i.e. walking, children playing, informal kickabouts, rounders, baseball, frizbee, youths meeting up, picnics etc. There are a huge number of walkers who use the Showfield everyday and the channelling of everyone round the perimeter strip of the fenced off football pitch would result in overcrowding with too many people at one spot at one time, wear and tear, erosion, trampling and loss of vegetation resulting in an unappealing area, an unattractive place to go and no adequate space for the mixed uses currently made of the Showfield. The current proposal focuses entirely on accommodating a resited football pitch to the exclusion of the needs and current use as an open green space by a multitude of other users for recreational use and exercise. The current proposal not only flies in the face of the Council’s acknowledgement of it as a greenspace which is integral to the town and its amenity but it also breaches the Scottish Governments Planning Advice Note 65 Planning and Open Spaces which gives advice on the role of the planning system in protecting and enhancing existing open spaces. PAN65 supports the Scottish Planning Policy SPP11 Open Space and Physical Activity. SPP11 sets out how Scottish Ministers expect open spaces issues to be considered by Local Authorities. Development plans have a key role to play in protecting and promoting high quality open space and they should safeguard important open spaces from development in the long term (par 37 of PAN65). The key objectives of SPP are to protect and enhance open spaces to protect and support opportunities for sport and recreation. (Par 14 SPP11 and Par 15 SPP11) Under Par 40 SPP11 there is a presumption against development on open spaces which are valued and functional and that Local Development plans will identify and protect such open space in line with the audit and strategy. The current proposal for 30 houses in the development plan is in breach of Par 57 SPP11 which states that Planning Authorities should set out in Local Development Plans specific requirements for the provision of open spaces in new developments. There is no reference to a Planning Agreement being required to keep the remainder of the Showfield an open space as a condition of the development of 30 houses. There was a S75 Agreement required for the previous development of 8-10 houses in the previous development plan. Par 28 NPPG11 Sport Physical Recreation and Open Space states that robust planning policies are required to safeguard established open spaces and playing fields where they contribute to local community needs and enjoyment. Par 94 NPPG11 states local plans should have regard to the recreational needs of all members of the population including disabled people, the elderly and children, not just footballers. It also states local plans should identify existing sports facilities, open spaces, pitches and playing fields and show those important for protection on the Proposals Map and indicate the circumstances in which the Council will seek to use S 50 Agreements. It should also include policies to protect and enhance existing open space and other land of recreation, amenity or wildlife value and prevent the piecemeal erosion of playing fields and pitches through a succession of small developments over a long period. Under Par 101 NPPG11 Councils should consider the recreational needs of all members of society including disabled people, elderly and children and resist proposals for the development of open space. The current proposals focus on the needs of footballers, not the vast number of other users which use the Showfield for non footballing exercise

and recreational activities. The current proposal flies in the face of the Highland wide Local Development Plan Policy 75 which states that existing areas of high quality accessible fit for purpose open space will be safeguarded from inappropriate development. All sites identified in the Audit of Greenspace will be safeguarded unless.....substitute provision will be provided meeting the needs of the local area. As mentioned above, building on half the Showfield with the remainder focusing on football use to the exclusion of the extent and nature of other recreational activities carried on at the Showfield is in blatant breach of the Council's own Policy 75. The current proposal also flies in the face of the Highland Council Supplementary Guidance Open Space in New Residential Development adopted December 2012 for anyone seeking planning permission for 4 or more dwellings. It states the Council's objectives in relation to open space sport and recreation provisions and that the Council seeks to ensure that open space in new developments will be well located, well designed, fit for purpose, sustainable and to promote health and well being. That cannot be achieved if half the Showfield is built on and half taken up predominantly by a football pitch with a 20 m perimeter for other recreational use. There is not sufficient space left for the other recreational uses which has to be accessible by non footballing persons, disabled persons, the elderly and children. If half the Showfield were built on it would result in a deficit of open space provision of that type within the locality and with the Highland Council's requirement that new developments of over 4 dwellings should supply a certain amount of open space for that development, the Showfield is being reduced by half and simultaneously the demand increased. In summary the current proposal is in breach of the Statutory provisions and policies set out above, is too high a density of building with not sufficient left of the Showfield to accommodate the nature of the current recreational usage, not just the football pitch, and has no planning agreement to safeguard the long term future of the unbuilt upon part of the Showfield as a high quality valued open space as identified in the Greenspace Audit and existing Local Plan. The need for 30 houses at the cost of reducing well used prime greenspace by half cannot rebut the presumption against development in SPP11. Once built on open space is almost certainly lost to the community forever (Par 38 NPPG11). The Showfield should be retained as greenspace.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04140	Name	Fraser Macpherson	Organisation	
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Agent Name and Organisation (if applicable)		
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Section	4.Development Allocations	Paragraph	4.32
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Reference	NA1	Type	Change	Comment Late	No
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Comment Changes

This area should be retained as a green field site.

Representation

Lost of amenity to the town if NA1 developed Lodgehill Road heavily used by school pupils and is currently subject to flooding. Waverly Road main route to schools, hospital and doctors. Present housing would prevent alterations to these roads I feel than any future development should be strictly monitored to ensure that adequate provision is made for schooling ,medical services and other community activities

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04138	Name	Douglas Inglis	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA1		Type	Change	Comment Late
				No	

Comment Changes

Under no circumstances do I think any development of this site should take place.

Representation

1. Nairn Showfield acts as an area of green space for the town. It is used by many for recreation, exercise and dog walking. Even to half this space isn't acceptable. 2. The surrounding roads are already extremely busy. The current infrastructure of this are does not support existing traffic far less more. Since the installation of traffic lights on the A96 through Nairn, the levels of traffic up the High Street, Cawdor Road, Waverly, Westbury and Wellington Road have already increased. Having young children this concerns me. 3. Much of the surrounding are is made up of beautiful period houses. I can only imagine any development will struggle to blend in or enhance the area and instead will continue to further dilute the areas character.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04488	Name	Janet E. Mackenzie	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1 former show field east		Type	Change	Comment Late
				No	

Comment Changes

Removal of site for housing development

Representation

I am writing to comment upon the above. This is a green lung for the town of Nairn, it stands between the old and the new parts of the town so is convenient for all areas, and it is used also as a pathway from one side to the other. I go past it every day and there is alwsys somebody using it, for golf, football, and just exercise for both dogs and people. It is used by the Nairn St Ninian football club and there are frequent matches there, and at night there are floodlights so that this can happen when it is dark. Many children walk to and from school across this field with a degree of safety and enjoyment which would not be there if there were houses. It is very obvious that they benefit from the freedom of the green space after a day in school. The other thing which concerns me is that it is local knowledge that the Title to this field contains a condition that no buildings must be built on it except a grandstand. I very much hope that the Nairnshire Farming Society who own this field, are able to be provided with another field for their Show which now needs something larger, and that this green space can continue to do service to the town in a way that is appreciated by so many of the citizens of the town, every day of the week.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04161	Name	Doreen Callaghan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	2.Guiding and Delivering Development		Paragraph	2.16 infrastructure	
Reference			Type	Support	Comment Late
				No	

Comment Changes

Representation

This paragraph clearly supports my argument (to follow) AGAINST the proposed development of the Farmers' Showfield in Nairn.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04498	Name	Kenneth Mackenzie	Organisation	Save our Showfield
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1 - Nairn		Type	Change	Comment Late
				No	

Comment Changes

Removal of site from the Plan & retention of greenspace

Representation

We are writing to you as office bearers of ‘Save our Showfield’ – a group of people who formed a committee in 1998 following great public concern regarding the proposed building of a supermarket on the showfield. Through local public support, with several public meetings, many letters of objection and over 3000 signatures on a petition to “keep the showfield green” we ran a campaign for 2 years and the planning proposal for a supermarket was rejected by a Scottish Office Reporter in 2000. We object to the present planning proposal of a housing development of the showfield for these reasons: 1. This is a valued green field space used by the public for general recreation where people walk their dogs, children play, as well as being the location of the Nairn St Ninian’s Football pitch. It is also in regular use as the location of car boot sales, a vintage car rally, a circus and is crossed by the public at all times. In 2000 it was noted that there was a deficit of 45% of available recreational land in Nairn. Since then the town has grown and so the deficit will now be greater. This space is a vital green lung for Nairn as it expands and a housing development would not only cause loss of this local amenity space, but also change the character of the town. 2. Viscount Finlay of Newton sold the field to the Farming Society in 1928 for £1000 with money paid by the Farming Society and public subscription. There is a restriction in the title that no house building will take place without the consent of Viscount Finlay or his descendants. In 1998 Lady Hays, his grand-daughter, was not willing to grant that consent and we see no reason why this will have changed now. 3. We consider the high density housing development now proposed for the green space is inappropriate and not in accordance with the existing surrounding houses in the area. What would be left of the field would be unsuitable for much of its current use, especially for football. 4. The Draft plan projects approximately 1900 new houses in 20 years. The removal of 30 from this total is not going to significantly affect the plan. 5. Our concerns are also for the detrimental impact such a development will have on the surrounding roads and as a direct result on the safety of pedestrians. The local residential roads - Lodgehill Road, Chattan Drive, Waverley and Westbury Roads are already struggling with the volume of existing traffic. There has been an increase in traffic flow since the relocation of both GP surgeries to the Nairn Hospital, and this, combined with the new Vet’s Surgery on Lodgehill Road and the existing traffic to the 2 local primary schools means that congestion is a problem as well as road safety. The junction of Lodgehill Road and Waverley/Westbury Road is particularly dangerous and of concern, especially for school-aged children. As Lodgehill Road itself ends in a cul-de-sac the quickest access to the A96 will be via Waverley Road. With the proposed development of houses there could potentially be up to 30-60 extra cars using this junction and these local roads, which are totally inadequate to cope. We are aware that the field is owned by the Nairnshire Farming Society, and we have members of the Society on our committee. If the Society should decide to relocate within the town we would be happy to support their relocation proposals, on the basis that the whole field remains green, and its amenity is maintained. This is supported by the Council’s own evidence stated in 2000 which emphasised the showfield’s importance as a structural open space derived from its use, its scale and position and as we have already mentioned, this is also within the terms of the existing legal title granted to the Nairnshire Farming Society in 1928

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04497	Name	Elspeth McLean	Organisation	Save our Showfield
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1 - Nairn		Type	Change	Comment Late
				No	

Comment Changes

Removal of site from the Plan & retention of greenspace

Representation

We are writing to you as office bearers of ‘Save our Showfield’ – a group of people who formed a committee in 1998 following great public concern regarding the proposed building of a supermarket on the showfield. Through local public support, with several public meetings, many letters of objection and over 3000 signatures on a petition to “keep the showfield green” we ran a campaign for 2 years and the planning proposal for a supermarket was rejected by a Scottish Office Reporter in 2000. We object to the present planning proposal of a housing development of the showfield for these reasons: 1. This is a valued green field space used by the public for general recreation where people walk their dogs, children play, as well as being the location of the Nairn St Ninian’s Football pitch. It is also in regular use as the location of car boot sales, a vintage car rally, a circus and is crossed by the public at all times. In 2000 it was noted that there was a deficit of 45% of available recreational land in Nairn. Since then the town has grown and so the deficit will now be greater. This space is a vital green lung for Nairn as it expands and a housing development would not only cause loss of this local amenity space, but also change the character of the town. 2. Viscount Finlay of Newton sold the field to the Farming Society in 1928 for £1000 with money paid by the Farming Society and public subscription. There is a restriction in the title that no house building will take place without the consent of Viscount Finlay or his descendants. In 1998 Lady Hays, his grand-daughter, was not willing to grant that consent and we see no reason why this will have changed now. 3. We consider the high density housing development now proposed for the green space is inappropriate and not in accordance with the existing surrounding houses in the area. What would be left of the field would be unsuitable for much of its current use, especially for football. 4. The Draft plan projects approximately 1900 new houses in 20 years. The removal of 30 from this total is not going to significantly affect the plan. 5. Our concerns are also for the detrimental impact such a development will have on the surrounding roads and as a direct result on the safety of pedestrians. The local residential roads - Lodgehill Road, Chattan Drive, Waverley and Westbury Roads are already struggling with the volume of existing traffic. There has been an increase in traffic flow since the relocation of both GP surgeries to the Nairn Hospital, and this, combined with the new Vet’s Surgery on Lodgehill Road and the existing traffic to the 2 local primary schools means that congestion is a problem as well as road safety. The junction of Lodgehill Road and Waverley/Westbury Road is particularly dangerous and of concern, especially for school-aged children. As Lodgehill Road itself ends in a cul-de-sac the quickest access to the A96 will be via Waverley Road. With the proposed development of houses there could potentially be up to 30-60 extra cars using this junction and these local roads, which are totally inadequate to cope. We are aware that the field is owned by the Nairnshire Farming Society, and we have members of the Society on our committee. If the Society should decide to relocate within the town we would be happy to support their relocation proposals, on the basis that the whole field remains green, and its amenity is maintained. This is supported by the Council’s own evidence stated in 2000 which emphasised the showfield’s importance as a structural open space derived from its use, its scale and position and as we have already mentioned, this is also within the terms of the existing legal title granted to the Nairnshire Farming Society in 1928

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04507	Name	Hazel Sime	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1		Type	Change	Comment Late
				No	

Comment Changes

Retain site NA1 as open space

Representation

I was at a meeting of about forty Nairn folk who, as well as I object to building on The Farmer's Field.Surely this greenfield site is protected in law from loss to developements like housing. also, what about the traffic problems that exist already in the area.These would be exacerbated to a totally unacceptable level.From what I have seen at the meeting, a very great deal of people are most alarmed at the prospect of the said development.I was at The Save Our Showfield campaign when some years ago developers wanted to build a supermarket on the green space described here.Also St Ninians football team trains there, and they value the space as you can imagine.The farmers who own the site can gain renting the space out to a large range of differing entertainment groups, circuses, car rallies, sports, historic displays etc.Please see reason in my argument, I remember being in the Steering Committee last time they tried to take away this dear green space.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04106	Name	Gillian Cruickshank	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32	
Reference	NA1 - Former Showfield East		Type	Change	Comment Late
				No	

Comment Changes

No houses to be built in this area.

Representation

This is a green-space used for feeding by oyster catchers & seagulls. Used by dog walkers and Nairn st Ninian football club. Houses here would ruin the views I have from my flat and be unsightly. They would make this very quiet area too built-up and congested, making it more difficult for me to get to work in the mornings, due to only one main access road to the main road. I feel building here would spoil the overall surrounding area and would make me no longer want to live here since my flat looks directly onto the showfield itself.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04103	Name	Charles Black	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	Nairn Showfield housing development		Type	Change	Comment Late

No

Comment Changes

I object to the proposal to build 30 houses on the Farmers Showfield site in Nairn.

Representation

The roads in the area are unsuitable for another 30 houses and the resulting addition of maybe 50 cars.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	00912	Name	Mr W MacLeod	Organisation	
Agent Name amd Organisation (if applicable)		Natasha Douglas		Ryden LLP	
Section	4.Development Allocations		Paragraph		
Reference	NA1		Type	Change	Comment Late
				No	

Comment Changes

NA1 to be deleted from the proposed LDP and its allocation transferred to land at Fort Reay.

Representation

What is the specific change you would like to see in the final Plan? It is requested that the allocation given to NA1 in the proposed LDP is transferred to land at Fort Reay. Site NA1 was allocated as site reference S2 within the Nairnshire Local Plan 2000 however, the site has not come forward for development. As per guidance contained in Scottish Planning Policy Highland Council should ‘focus on what has changed, for example the extent to which key assumptions remain valid, whether land allocations have proved viable’ (paragraph 20). It is evident that the allocation at NA1 is no longer valid; had it been an application for planning permission would have been submitted. Accordingly the allocation should be removed from the plan and the allocation transferred to land at Fort Reay. Transferring the allocation to Fort Reay, which is deliverable in the short term, would contribute to the housing land requirements stated in the Highland wide Local Development Plan (HwLDP). Transferring the allocation to land at Fort Reay will secure the sites current status as an area of open space; it is identified in the Highland Greenspace Audit 2010 as ‘public parks and gardens’. The loss of this land to accommodate development is not only detrimental to the local community, but directly contravenes Scottish Planning Policy (SPP) which states clearly in paragraph 149 that ‘Planning Authorities should support, protect and enhance open space’. Identifying NA1 for development is therefore at odds with national policy. In discussing greenspace provision in Nairn the Highland Greenspace Audit 2010 explains that there is an undersupply of provision for children and teenagers in the form of play areas. NA1, being identified as a public park and garden within a residential area is ideally located to accommodate play facilities thus meeting the shortfall in provision. Highland Council should recognise that Scottish Planning Policy has changed since the adoption of the Nairn Local Plan in 2000 and should not, in keeping with SPP, identify NA1 for development. Instead Highland Council should protect NA1 safeguarding it for open space; thus complying with the objectives of SPP. With alternative options for development, such as Fort Reay, there is no requirement to carry NA1 forward into the proposed LDP. It is understood that the Nairnshire Farmers Society seek allocation of NA1 to finance the relocation of the Nairn Show, as it has outgrown the show field at NA1. It is considered that land could be made available within the expansion areas to the west (NA4 and NA6) or south (NA8 and NA9) of Nairn to accommodate the Nairn Show. Doing so would not only benefit Nairnshire Farming Society but would retain public open space within Nairn town centre. With the opportunity to identify areas of the larger site for community use, Highland Council is encouraged to use this avenue to relocate the Nairn Show in preference to unnecessary development on open space at NA1. Whilst the scale of the Nairn Show may require larger grounds in the future this does not mean that the current ground, which is currently open space in the town centre, is suitable for and should be lost to housing development. It is therefore respectfully requested that NA1 is not carried forward into the proposed LDP. Its allocation should be transferred to land at Fort Reay.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04523	Name	William Whyte	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA1	Type	Change	Comment Late	No

Comment Changes

Retain site NA1 as open space

Representation

I wish to show my objection to the proposed building of housing on the 'Farmer's Showfield' in Nairn. This valuable green space in the centre of Nairn should be kept free of any building developments.
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Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04027	Name	Alexander Thomson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA1		Type	Change	Comment Late
				No	

Comment Changes

The Showfield should be retained as an Amenity Openspace and Outdoor Sports Facility which is its current designation in the Highland Greenspace Audit 2010. There should be no development allowed on the Showfield which should be retained as an Openspace for the benefit of the inhabitants of Nairn.

Representation

Introduction As part of the Inner Moray Firth Proposed Local Development Plan (IMFLDP) I received a letter from you regarding the proposals for the Former Showfield in Nairn. Currently the Showfield is an open, grassed area of approximately 3.6 ha. It serves as an amenity greenspace for the residents of Nairn where they can walk, exercise, the children can play games and people can enjoy being outdoors. Additionally it contains the football pitch used by a local amateur side to train and hold matches. As such the Showfield serves as a very important and valuable open space to the residents of Nairn. The Highland Greenspace Audit 2010 recognizes it as such on one page identifying it's primary role an Amenity Greenspace with being an Outdoor Sports Facility as a secondary function and then on the following page showing its primary function as being an Outdoor Sports Facility. Whilst this is a contradiction, clearly both roles were seen as being so important that it was difficult to determine which was the primary role and which the secondary as numerous local residents walk, play and exercise daily and the football team trains and plays regularly. Clearly the Showfield is a very important asset for the fitness,wellbeing and enjoyment of the people of Nairn. Current Position Under the current Nairnshire Local Plan (Adopted 2000, continued in force 2012) the Showfield is identified as primarily being kept as open green space for the community with the potential for a small development at the south eastern end. Specifically this proposal is Development of 8-10 houses 0.6ha for development (approx 16.5% of Showfield area) Pedestrian access to the Showfield from Lodgehill Road through the development specifically mandated As a condition of planning consent the developer would have to enter into a formal Section 75 agreement securing the use of the remainder (approx 3 ha. 83%) of the Showfield as a public open space. Importantly this proposal retains most of the Showfield as Open Space and keep a large enough area to fulfill the roles of both Amenity Greenspace and Outdoor Sports Facility (fenced off football pitch). Proposed Change in IMFLDP In the letter I was sent about the IMFLDP there is a significant change in the designation and proposed use of the Showfield. Firstly the Showfield is shown only as a Sports Ground despite the fact that the Highland Greenspace Audit 2010 identifies its primary use as being an Amenity Greenspace and any observation of the large number of residents who use it daily to walk and exercise would confirm this designation. Secondly the new proposal under the IMFLDP is for Development of 30 houses 1.8 ha. for development (approx 50% of Showfield area) No specific mention of pedestrian access from Lodgehill Road through the development to the remaining area of Showfield No requirement for a formal Section 75 agreement on the future of the undeveloped part of the Showfield only a general comment that it should be retained as greenspace used as a reconfigured football pitch. Comments In the letter I was sent about the IMFLDP proposals for the Showfield it is marked as a Sports Ground. This is incorrect and contradicts the designation in the Highland Greenspace Audit 2010 where the primary role is correctly shown as an Amenity Openspace with a secondary role as an Open Space Sports Facility. In order to understand the role the Showfield fulfills for the local community it is important that it is not simply seen as a sports field but that full weight is given to it's role as an amenity openspace and it should be designated as such on the IMFLDP. The increase in the number of houses proposed is excessive. If any of the valuable amenity greenspace has to be built on at least the old plan with 8-10 houses was reasonable and preserved most of the Showfield as greenspace for the benefit of the community. This plan retained sufficient space to allow for both a football pitch and a good amenity area for walking, exercising and playing. The new IMFLDP proposal to build 30 houses and develop half the area of the Showfield does not. What remains of the Showfield will be almost completely dedicated to a fenced off football pitch and pavilion with only a very narrow strip of greenspace left round the outside of the pitch. This area will be insufficient to satisfy the important amenity role which was identified as the Showfield's primary use in the Highland Greenspace Audit 2010. This proposal will significantly reduce the open green space in central Nairn. The IMFLDP is not mandating that any retained part of the Showfield will be under a Section 75 agreement restricting it to being kept as a Greenspace for public use. This omission allows any developer far too much leeway. In the case where the developer collapses or decides to wind the company up there would be no formal restriction on the use of the remaining part of the Showfield. While unilateral undertakings with covenants may be a suitable approach for the provision of off site play areas and the like this is not the case where the obligation is to keep a specific piece of land as a public Greenspace. A formal planning restriction on future use attached to the land itself is the only robust approach and should be spelled out as such. The Scottish Government provides statements of Government policy on nationally important land use issues. One of these is SPP; PAN 65, Planning and Open Space which clearly states in paragraph 37 that "Development plans have a key role to play in protecting and promoting high quality open space. Development plans

should safeguard important open spaces from development in the long term and identify spaces that require specific improvement.....". To clarify their position on this issue Highland Council have adopted 2 specific policies for Open Space and Physical Activity. In the current Highland-wide Development Plan Highland Council has adopted 2 specific policies for Open Space and Physical Activity, namely Policy 75 and Policy 76. Policy 75 states that the Council will safeguard existing areas of high quality and fit for purpose open space such as the Showfield and that any development of 4 or more houses will be required to provide additional publicly accessible open space. In the face of this stated policy it is a contradiction that Highland Council proposes in the IMFLDP to build housing on 50% of a high quality open space in the heart of Nairn and then devote what remains to a football pitch. This would be to the significant detriment of the many local residents who walk, exercise and play on the Showfield on a daily basis. The only way that the Council can meet its stated policy and preserve the primary role of the Showfield as an Amenity Openspace would be to retain the area left after development as a green, open space with no football pitch not to halve the openspace and use that area almost exclusively as a fenced in football pitch and pavilion. This would mean there was no football pitch however Policy 76 states that the Council will safeguard playing fields from development so clearly both policies cannot be met under the current proposals for the Showfield. The solution is clear. In the IMFLDP as too much area is being developed and too little retained to enable the Showfield to continue fulfilling its current valuable roles as Amenity Openspace and Outdoor Sports Facility never mind that the proposed development would require an increase in both. To meet Highland Council's stated policy objectives the IMFLDP should not be proposing that any of the Showfield open space should be given over to development. It should be retained as a mixture of amenity openspace and a football pitch. However if there has to be any development on the Showfield then it should be restricted to the 8-10 houses with all the other caveats specified in the Nairnshire Local Plan (Adopted 2000, continued in force 2012) as any other proposal would retain insufficient openspace to provide both an area for the public to walk, exercise and play and football pitch much to the detriment of the inhabitants of Nairn. Allowing development of 50% of the Showfield also flies in the face of the Council's stated policies on Open Space and Physical Activity and severely damages their credibility on this important issue.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04489	Name	K.F.S. Mackenzie	Organisation	
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Agent Name amd Organisation (if applicable)		
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Section	Development Allocations	Paragraph	
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Reference	NA1 - Nairn	Type	Change	Comment Late	No
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Comment Changes

Removal of site from plan and retention of greenspace

Representation

I have read this plan with great care and would like to make the following observations. 1, First I would like to object in the strongest possible terms to the proposed housing development at NA 1 for 30 houses. I travel up and down Lodgehill Road several times a day and the road is inadequate for the existng volume of traffic. The road is a cui de sac and the junction with Al Waverley/Westbury Road is dangerous. Waverley Road road carries a lot of traffic particularly I5/ since the rebuilding of the hospital and the moving of the local G.P. Surgery to that building. The N A J proposed site is known as the showfield locally and is a very valued open space which is used by may local residents at all times and is part of which sets the whole character of the town. It is also used very regularly as a football field and reducing it by half would not be an adequate substitute. Some years ago when there was a proposal to build a supermarket on it, there was a public outcry and a petition of 3000 signatures was produced. I have no reason to believe that the public would change their view on development now.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04222	Name	Clifford Cooke	Organisation	n/a
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA1 - 30 homes		Type	Change	Comment Late
				No	

Comment Changes

That this remain as a designated green space and not zoned for housing.

Representation

Site: NA1 – Former Showfield East I wish to object to the Local Development Plan proposing that this recreational land be allocated/zoned for 30 homes. Loss of green space: • this ground, as the second largest green space in Nairn, is valued as green space at this side of the town. • Loss of this green land seems disproportionate for the relatively small town-wide gain of 30 homes, and Achareidh (17.9 hectares) is only provisionally allocated for 6 houses. • it has been previously noted that there are insufficient green spaces across the town, and • relative to the properties surrounding the Showfield, 30 homes in 1.8 hectares indicates a high density. Ownership of the Showfield: • it is my understanding that there is a specific covenant contained within the Title Deeds denying the right to build anything other than a show stand. This condition has not been, to my knowledge, legally set aside. This ground was purchased on this basis, with support through public subscription. • As the Nairn Farmers’ Society owns this land, what options have been explored with this body to “exchange” this green space for Common Good ground elsewhere in the town? The Local Plan points to this as an option with some merit - "consideration of a potential excambion of land ownership for land at Sandown for a new showfield" Access issues: Whilst I accept that these would form part of the dialogue at an outline planning point, the following would be significant issues: • suitable road access, and • pupil flow along Lodgehill Road during term time.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

As per representation.

Representation

I am a householder adjoining the Nairn Showfield. I have several objections to the proposed changes as outlined in the Inner Moray Firth Proposed Local development Plan. From personal observation I can say this area is used considerably by the Nairn area population. It is a popular summer destination for families and groups of children of all ages. These groups use the field for ball games, kite flying, informal football and other children's games. Many local people use the field for dog walking from early morning to late at night and to deprive the dog owners of this space would be unwelcome by many people. In the summer Sunday School trips and other outings from towns outwith Nairn use the field for their picnics and other activities. School children from the school use Lodgehill road to go to and from school and at lunchtime to go to the town and the increase in traffic must pose a danger to them In the past year it was the venue for a circus and also a visiting car/van attraction. These events are well patronised by the people of Nairn and earn revenue. The rescue helicopter has also, on occasion, used the Showfield. This attractive local open space will be badly missed if planning permission was given for housebuilding and I strongly urge the Council to reject this proposal [redacted]

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

I wish to object to the Farmers Field or any part of it being made available for development of any kind. I believe it should remain a public amenity space.

Representation

•The Farmers Field is a public amenity which should not be sacrificed to becoming a residential development. There is an established football club using this ground with a junior section deriving considerable enjoyment and exercise from activities geared to younger player. It is frequented by many people exercising their dogs. It is an open space for siting various attractions visiting the town. •Residential development would pose a traffic hazard by virtue of the increased volume of traffic on Lodgehill Road. Increased congestion of traffic would take place at peak times, primary- school children and Academy pupils walk and cycle along Lodgehill Road in considerable numbers. Winter months with reduced visibility and increased traffic poses an added hazard. •Concern of overloading the already heavy volume of traffic in Waverley Road, accessing the Cawdor Road. Parking too near the junction of Lodgehill and Waverly Roads already causes gridlock at peak times, creating the potential for an accident black-spot during school commuting times. •The Plan as it stands points to a possibility of land at Sandown being made available ' in exchange' for the farmers field in order that it may remain a public amenity. There would be merit in exploring this option further.

Allocated to

Customer Number	04172	Name	Richard Mobey	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA1		Type	Change	Comment Late No

Comment Changes

Showfield to remain as greenspace.

Representation

The proposal to erect up to 30 houses in this area is not necessary and the area should remain as greenspace. With the potential of up sixty additional cars using Lodgehill Road and Waverley Road for access to the A96 this would cause unacceptable traffic problems at peak times and probably throughout the day. This is a quiet residential area and further housing close to the town centre is not needed. This is the only greenspace left in this area and needs to be preserved for the future.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04397	Name	Alec Barden	Organisation	
Agent Name amd Organisation (if applicable)		HHL Scotland		HHL Scotland	
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA1 Former Showfield East		Type	Change	Comment Late No

Comment Changes

Concern is expressed over the level of housing units proposed for the site (30). The Objector would support a reduction in the number of units and the number relocated to another site within the town limits, namely land at Torwood, Moss-side Road, Nairn.

Representation

The Nairn Showfield plays an important part in the green space provision within the town and whilst it is acknowledged that the site is now not appropriate for the agricultural show for a number of reasons, the land is still well used by local sport teams and for general recreation provision. The Showfield would no doubt benefit from some environmental improvements works, including landscape planting and play park provision and the objector understand this might best be achieved by the land owner developing part of the site for residential development, for which there has been a long standing zoning for such. Unfortunately the IMFLDP has significantly increased the level of the residential development to a degree which the objector (and various other local residents) believes is excessive given the important of the green space and road network access. Consequently, this objector believes the housing unit number should be reduced and other land identified within the town boundary to accommodate these properties. In light of this, he would advocate that his land holding at Torwood (see attached plan) could be appropriate, subject to suitable environmental assessments, as a suitable alternative for these additional housing units.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04161	Name	Doreen Callaghan	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41 - Housing	
Reference	NA1 - Former Showfield East		Type	Change	Comment Late No

Comment Changes

That No development should be allowed on this site - no housing of any type.

Representation

I object to the development of the Showfield for the following reasons :

1. The field is an existing green space which clearly fulfills the criteria given in section 2, paragraph 2.16 - in that it is regularly used for recreation and leisure by residents and visitors to Nairn. It is used by children, dog walkers, a Football Club, Car Boot Sales, Vintage Car Rallies, Circuses, Motor shows to name but a few. As stated in paragraph 2.16 - there is a real need to provide (green) spaces for Nairn residents to ".....meet friends and neighbours, take part in in sport, recreation and play while also making a significant contribution to the diversity of an area."

2. Vehicular access to the proposed housing development would cause severe congestion problems on Lodgehill Road, Waverly Road, the junction of these two roads, and the junction of Lodgehill Road and Chattan Drive. There are already problems on these roads. Lodgehill Road is quite a narrow road - so it would have to be widened to allow access to the proposed housing site - this would also cause substantial safety problems, severe disruption to the area and a probable worsening of the already poor drainage in this area.

3. Safety issues - Lodgehill Road is a major walking route to and from Nairn Academy. Nairn Academy pupils' safety would be at risk with extra traffic . Similarly, many young children walk from the local Primary Schools to Tradespark estate along Lodgehill Road.

4. I would question the need for such housing. Where is the evidence that a demand for so much housing exists?

5. I would refer you to the proposed Nairnshire Plan of 1998 where the owners of the showfield - Trustees of the Nairnshire Farming Society made and application to the Lands Tribunal for Scotland for discharge of a perpetual land obligation affecting the Showfield. This obligation I believe - is that no development be allowed on this land. The proposal then was to build a supermarket on the Showfield - and the local opposition to this proposal was huge. Such was the opposition that the application went no further.

6. Another application by the Nairnshire Farming Society to the Lands Tribunal would have to be made. once again I feel sure that local opposition would affect any subsequent hearing and the application rejected.

7. In 2000, Nairn Council published their plan which included Para 10.(f) says, "0.6 ha at the Showfield – 8-10 houses, 2 storey, design and form should be compatible with the proposed Conservation Area; access from Lodgehill Road including to the Showfield for maintenance and pedestrians; and adequate distance from trees and the sub-station. The Council will seek Section 75 agreement with the landowner to secure the remainder of the Showfield as public open space." It is disturbing and puzzling how a possible plan of 8 - 10 houses has suddenly grown to the present proposal of 30 houses!!!

8. I refer you to some proposals by Nairn Improvement Community Enterprise regarding the Showfield on 8/3/2011:- "One possible way forward would be for the Council, as custodians of the Common Good, to do a deal whereby they accepted the Showfield into the Common Good in exchange for a suitably-sized part of the Sandown Common Good land, given to the farmers (perhaps with some associated financial arrangement) and designated specifically for use as a new Show venue." I believe this option would receive considerable support from Nairn residents.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	04176	Name	Calum McLean	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA1 - 30 Homes		Type	Change	Comment Late
				No	

Comment Changes

Keep the whole of the former showfield as a green space.

Representation

We are writing to express our objection to the proposed zoning of the Farmer’s Showfield for housing development. We have several major concerns about this: 1. If the proposed development of 30 new homes went ahead, it would potentially house 50-100+ people, and 30-50 cars spilling out onto Lodgehill Road would have a major impact on traffic and road safety in this residential area. Currently there is no pavement along the west side of Lodgehill Road that borders the showfield. There is no prospect of providing a pavement at ‘Monimail’ at the junction of Lodgehill Road without narrowing an already narrow road. The high walls on both sides of Lodgehill Road at the junction with Waverley Road and Westbury Road, already mean that this is a difficult and dangerous crossing. Pupils from Nairn Academy currently walk en-mass along the middle of Lodgehill Road to and from school and during lunchtimes, making Lodgehill Road difficult to drive along. With more cars there would be an added risk to their safety. 2. There are existing congestion and traffic flow problems along Waverley Road caused by cars being parked along one side of the road. This has been exacerbated by the increased level of traffic along Waverley Road due to both the Lodgehill and Ardersier doctors’ practices, and the new dental facility all being relocated to Nairn Hospital. Added to this are the close proximity of Rosebank and Millbank Primary Schools which makes this a very busy area, especially Waverley Road, with pupils walking and being driven to school. Recently the new vet’s surgery has just opened on Lodgehill Road, again adding to the traffic flow, and making the junction at Lodgehill Road and Waverley Road particularly difficult for pedestrians and vehicles alike. A development in the showfield would only add to this congestion, and definitely pose an added risk to pedestrians – in particular school age children. At busy times it is already very difficult to turn onto the A96 from Waverley Road – 30-50 cars would significantly increase this problem. Waverley Road, Lodgehill Road and Chattan Drive are residential roads ill-suited to high volumes of traffic. The proposed development of homes in the showfield, would add considerably to the burden of traffic and increase risk to pedestrians. 3. Green field areas are precious and should be retained wherever possible. This is particularly true when towns are growing, as the distance to green areas increases. They are the lungs of any town or city and as such should be carefully protected. In the residential area around the showfield there are no large open places for local children to play. At the moment it is easily accessed from Lodgehill Road, making it a safe place to play and for other locals to enjoy. It is a vital local amenity and to build a relatively high density residential development even on part of the field would be to change the nature of the area completely. There will always be pressure to build on central green spaces and we feel the Highland Council should have the foresight to protect this site, as a valuable green asset. If not, Nairn will end up one large housing development with little green space to enjoy, except for those areas adjacent to the seaside. This would be a sad legacy and destroy what is currently a pleasant town.

Allocated to	Nairn	NA1	Former Showfield East	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA11	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

NA11. Balmakith. This proposal should include a road bridge over the railway as per no. 2 above. - Page 66, NA2 South Kingsteps. There should be no further housing built to the east of Nairn until the transport links have been improved. This means a road from the A96, Balmakeith, over the railway line to link in with the current development being proposed.

Allocated to	Nairn	NA11	Balmakeith	
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Customer Number	01031	Name	John Gordon And Son	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	NA12		Type	Change	Comment Late
				No	

Comment Changes

The IMFLDP should: state under NA12 (Requirements) “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill expansion area to be provided by developers should be a minimum of 35m-wide”.

Representation

Grounds of Objection Our client has participated fully in the Local Development Plan, the Nairn South Strategic Masterplan including in the “collaborative approach between all interested parties” the Council has promoted, and in the planning applications (11/04355/FUL) and (13/01276/PIP). Their interests are referred under the PLDP reference “INDUSTRY NA 12 Sawmill Expansion”, but are not adequately represented in that regard. The future of the sawmill is affected by development at Nairn South. This objection is to the PLDP provisions relating to NA8 and NA9. This objection should be read in conjunction with objections to NA8 and NA12 on behalf of John Gordon & Son. The Council is therefore fully aware of the critical impacts and potential conflicts that development at Nairn South poses for the future of the sawmill and the economy of Nairn. It is absolutely vital that appropriate provisions are made to safeguard the sawmill and its potential for development. Critical to this are (1) the operating effects of the sawmill, at present and as part of the proposed expansion, and the requirement on developers/landowners at Nairn South for an appropriate buffer, separation distance and noise attenuation measures; and (2) the need for developers/landowners at Nairn South to deal appropriately with the transportation requirements of the sawmill as an existing, long established strategic land use. In the light of two planning applications affecting land at Nairn South [one refused (11/04355/FUL) and one to be determined (13/01276/PIP)]; our client lodges the following grounds of objection to the PLDP. Recommendation The Inner Moray Firth Local Development Plan should follow the provisions in the Highland Wide Local Development Plan and the Nairn South Strategic Masterplan, and reference should be specifically made to avoiding any potential impact on the expansion of the sawmill. In that regard and in view also of the decision in relation to (11/04355/FUL) and the recommendation therein; NA8 “Requirements” should also state “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill to be provided by developers should be a minimum of 35m-wide”.

Allocated to	Nairn	NA12	Sawmill expansion	
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Customer Number	01232	Name	Mr Charles Allenby	Organisation	
Agent Name amd Organisation (if applicable)		Mr Robert Evans		Muir Smith Evans	
Section	4.Development Allocations		Paragraph		
Reference	NA 12		Type	Change	Comment Late No

Comment Changes

Reference to the sawmill expansion should include the words “principles of”... the Nairn South Masterplan to provide some flexibility and a more detailed stage in defining boundaries. Reference should also be made to the provision of the pedestrian and cycle bridge across the railway by including the words “(accommodating new bridge over railway)” are added in the reference of NA12. The wording of NA12 should therefore be amended to read as follows: Suggested wording: Site : NA12 Sawmill Expansion Area (ha): 5.1 Uses: Sawmill expansion (accommodating new bridge over railway) Requirements: Development in accordance with the principles of the Nairn South Strategic Masterplan.

Representation

The current area defined prejudices one of the key infrastructure requirements of the Nairn South Masterplan. Whilst the boundaries are not defined in detail, there is no recognition of the railway bridge and the current proposals map is prejudicial to its delivery. Wording of Policy NA12 should also include qualification that the piece boundary of the area to be defined otherwise the line as shown on the existing plan will become prescriptive by default. It has not been subject to detailed scrutiny and was initially defined by a Highland Council planning officer in the A96 Corridor study. The area was then measured to be 5.1ha. There was no operational justification for the precise boundary. It is therefore suggested that a more flexible approach is adopted which specifies that 5.1 ha or thereby is provided for potential sawmill expansion and new bridge over the railway.

Allocated to	Nairn	NA12	Sawmill expansion	
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Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 - 4.41	
Reference	NA12		Type	Support	Comment Late No

Comment Changes

Representation

The Sawmill expansion should be encouraged / supported. Gordons presently has 100 employees - expansion would be good for the town.

Allocated to	Nairn	NA12	Sawmill expansion	
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Customer Number	01003	Name	Sainsbury's Supermarkets	Organisation	
Agent Name amd Organisation (if applicable)		Katherine Pollock		Turley Associates	
Section	4.Development Allocations		Paragraph		
Reference	NA13 - South of Balmakeith		Type	Change	Comment Late No

Comment Changes

The description of acceptable uses for this site should be amended to 'Retail'.

Representation

The description of acceptable uses for this site should be amended to 'Retail'. The 'Non-food retail' description provided in the Proposed Local Development Plan does not accurately reflect the existing use on the site (a Sainsbury's supermarket) or the uses permitted under planning permission 07/00099/NA.

Allocated to	Nairn	NA13	South of Balmakeith	
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Customer Number	04158	Name	Andrew Stanley	Organisation	Soudley Research Ltd
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA13		Type	Change	Comment Late No

Comment Changes

Changes as per comment 1.

Representation

Our representation is detailed in comment 1 but as our representation letter is two pages plus plan and there is a limit of two files per comment, here is page 2 of our letter.

Allocated to	Nairn	NA13	South of Balmakeith	
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Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 - 4.41	
Reference	NA13	Type	Change	Comment Late	No

Comment Changes

Any further retail development should not be encouraged.

Representation

The decline of the Town Centre following the opening of the Supermarket must result in a rethink in the out of town retail shops. Any proposed development at this location should meet with the approval of the Association of Nairn Businesses.

Allocated to	Nairn	NA13	South of Balmakeith	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA13	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

NA13. South of Balmakeith. The current supermarket has had a detremintal effect on the town center since its opening. Any further development in the non food retail will only exesprate the situation. Therefor I request that there be no further development on this site and it be with drawn from the plan.

Allocated to	Nairn	NA13	South of Balmakeith	
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Customer Number	04158	Name	Andrew Stanley	Organisation	Soudley Research Ltd
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA13		Type	Change	Comment Late
				No	

Comment Changes

Increase size of allocation NA13 to natural boundaries.

Representation

The area allocated as NA13 does not reflect the existing settlement boundary, does not provide flexibility for new and existing businesses and does not provide Nairn with a range of development sites for the expanding population. Our comments are contained in the attached file.

Allocated to	Nairn	NA13	South of Balmakeith	
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Customer Number	01248	Name	Mr Scott Macdonald	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2 South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

Delete area NA2 from the IMFLDP.

Representation

Further to the comments I submitted on 16 Nov 2013, and as clarification to those comments, I would like to make it clear that I strongly object to the area NA2 being developed in any capacity. The reasons are: The houses are not required (i.e. the demand for housing can be met in more appropriate sites west of Nairn). The site is not appropriate for a "dormitory" to Inverness as it is on the opposite side of Nairn from Inverness and thus will increase existing congestion problems in Nairn. Lochloy Rd cannot accommodate any additional traffic above the existing levels. The burn will be adversely affected.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	01248	Name	Mr Scott Macdonald	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2 South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

Delete area NA2 from the IMFLDP, or reduce the Housing Capacity for area NA2 from 90 to between 20 and 60 houses

Representation

The entire development is not required as the IMFLDP projected demand for housing in Nairn is a gross over-estimate. The applied-for figure of 90 homes appears to be derived from a transport study that stated that the existing Lochloy Rd at Kingsteps has capacity for traffic from an additional 90 homes, and not from any study based on appropriate housing density. The development's housing capacity should come from a much broader basis than just the capacity of the existing road. Further the transport study mentioned above was based on inadequate data i.e. a single 1hour survey of existing traffic, and did not account for recent growth in foot, cycle and road traffic from the Lochloy developments heading east via Kingsteps, either to Kingsteps carpark or further afield and therefore the study appears to overestimate the additional capacity of Lochloy Rd. The proposed housing density of 90 houses in 6.5ha would represent a huge increase compared with directly neighbouring areas and such a high density is not appropriate or required. 90 houses in 6.5ha is equivalent to 14 houses/ha, which is 450% higher than neighbouring properties at Kingsteps and 50% higher than neighbouring properties in the new Lochloy developments. A more sensible housing capacity would be in the region of 20-60 houses. The sensible and safe option for the NA2 development's road links is via the existing Lochloy developments (via Montgomery Drive and/or future Southern link across railway line to A96) rather than via Lochloy Rd. The capacity and safety of the arterial road through the Lochloy developments is significantly greater than Lochloy Rd which has numerous danger spots. The roading and surfaced areas of the development will result in increased quantities and accellerated rate of run-off into the burn to the North of the site. This plus possible modifications to the burn route and vegetation along the banks of the burn could increase risk of flooding to existing properties on the North of the burn. The existing burn in the area of the development is relatively untouched with a winding route and banks with mature trees between the existing properties to the North and the proposed development. The burn, including its trees, banks, and the narrow field to the North of the proposed development should be protected from future development as they provide a natural wildlife corridor and amenity between existing properties and the new development. It is noted that one of the original planning application submissions for NA2 stated that the owner of the site lives on the site. This is not correct and could be construed as misleading. Our understanding is that the owner only lived on the site on a temporary basis as their new house was being built on another site, and has not lived on the site for the last 2 years. Common-sense arguments similar to those that defeated the application to develop Nairn South dictate that a significant development in East Nairn accessed via Kingsteps/Lochloy Rd does not make sense. The bulk of commuter traffic from East Nairn will go through or around Nairn on its way West to to Inverness, and subsequent traffic, Nairn congestion, and back road rat-run safety issues have not been considered adequately. Until a bypass has been built, the obvious location for development of Nairn is the West side closest to Inverness.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04190	Name	Arthur and Sheila Masson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2 previously H7		Type	Change	Comment Late
				No	

Comment Changes

There should be no development permitted which allows any direct access to the north of the site ie directly on to Lochloy Road

Representation

Ref: Inner Moray Firth Proposed Local Development Plan Site NA2 - South Kingsteps . We write with reference to the above and would strongly urge that the following points be considered by the council in its proposed allocation of site NA2 for 90 homes. At the time of your previous request for people’s views on the possibility of allocating this land for development, we were concerned that there should be any further development in the area. We contacted the landowner of site NA2, who readily came and showed us her proposed plans for the site. Her plans were for access to be through the current development to the south, now designated as site NA5, and a housing density of no more than 6 to 10 houses. There would be no building north of the burn which runs through the site as it is a low lying marshy area on which it would prove difficult to build. This marsh was cited by the landowner as a problem and was part of her reason for excluding it for housing. She suggested also that it would be retained as a desirable and effective green area between the existing settlement of Kingsteps and the new Lochloy housing estate to the south. The current proposal for development of Site NA2 with 90 houses, with access on to Lochloy Road, we feel, is totally unacceptable for the following reasons:-

1. Lochloy Road is a narrow, winding country road which is in no way capable of coping with an additional load of upwards of 100 cars. It currently struggles to carry the increased traffic heading east from the ongoing Lochloy /Springfield development. Safety issues are already of paramount concern for existing home owners in Kingsteps for this reason.
- 2.Additional stress would be placed on the water supply and sewage facilities which are already under undue pressure in the area.
- 3.A housing allocation of this density is not in keeping with the existing pattern in the community. A recent planning application for ground at West Kingsteps for a density of 7 houses on 2.5 acres, as was requested by the landowner, was limited by the planning authority to only 5 houses. Recent development in the Kingsteps area has proved to be more than sufficient for the current level of services. Any further development as suggested for Site NA2 would be extremely hazardous for the local community and would not be commensurate with preserving Kingsteps’ current identity as a separate rural community.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04298	Name	Roddy Mackellar	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2 - South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

removal of NA2 from Inner Moray Firth Development Plan

Representation

Lochloy Road concerns: It is obvious that Lochloy Road is already at capacity and perhaps even beyond capacity. To build an additional 90 houses with an average of 2 cars per household and have these cars run through the Kingsteps community seems not to have been thought through properly. A full transport assessment should have been taken before including this site in the plan. The road through Kingsteps is narrow and many cars still speed through that section of road. If the road was upgraded and widened I fear that this would encourage motorists to further speed through this essentially rural area. Some of the houses at Kingsteps have young children. I fear that at a time when roads are increasingly being planned to make them safer for children, Kingsteps may be made an exception. No access should be taken via Kingsteps. Housing Density Any sympathy I may have had for a development adjacent to Kingsteps (NA2) has gone. I feel 90 houses in such a small area, so far away from the town centre is not in keeping with the rural nature of the area. There are other areas in Nairn where housing density of this level would be more appropriate. Housing density should be consistent with the existing density at Kingsteps. I also have concerns regarding the increased run off that such a large development would create. The water would flow much more quickly into the small burn runing between Kingsteps/though NA2. It would certainly increase the risk of the burn overflowing, potentially creating a flood risk for some homes. If any development was to go ahead I think that a buffer zone should be created north of the burn. It should be landscaped appropriately to allow Kingsteps to remain separate and retain it's identity.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04314	Name	Hazel Morrison	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2 South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

Inner Moray Firth Proposed Local Development Plan Site: NA2 – South Kingsteps I write with reference to the above site proposed for inclusion in the IMFLDP. Whilst not completely opposed to some degree of housing development, I would like the following points to be considered and implemented if the site is to be adopted in the IMFLDP. Kingsteps is a historic rural settlement in it’s own rights and any development adjacent to this area needs to be sympathetic to ensure Kingsteps retains it’s individual identity. Accordingly; a. In it’s current format Lochloy Road is incapable of serving a development of an additional 90 houses and any attempt to improve/widen to achieve an access at the Eastern end of Kingsteps would completely disrupt the harmony of the historic Kingsteps hamlet. Lochloy Road is already running at capacity (or above it) and an additional 90 houses each with a minimum of 2 cars per household would render it unsafe. If any development whatsoever is granted for site NA2 then access should be taken via the current Springfield development and not from Lochloy Road. b. The implied housing density of 6+ houses per acre is not appropriate for site NA2’s semi-rural location. Housing densities should be consistent with the rural Kingsteps area where all properties are built on 0.5+ acre plots. Therefore housing density on the proposed site NA2 should be restricted to 2 houses per acre. c. No house building whatsoever should be permitted north of the Kingsteps burn which dissects the site. I would insist this is a condition of any future Planning consent to create a divide between any new housing and Kingsteps and to ensure Kingsteps retains it’s identity as a settlement in it’s own right. A landscaping proposal should also be agreed and implemented prior to any house construction commencing. It should incorporate a 20 – 25 metre wide dense planted zone along the northern boundary of site NA2 bordering Kingsteps to ensure Kingsteps retains it’s own separate identity.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04118	Name	Mark Connolly	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

Restriction on Nairn development NA2

Representation

<p>In the allocation for development of proposed site NA2 I have no objection to the development per-se other than the access. It appears that the development requires access onto the Lochloy Road. At present the road from Druim to the beginning of the 30 MPH speed-limit area at the golf course is far too narrow to cope with the existing traffic. Further access on the scale proposed under NA2 will take the traffic flows from being inconvenient to ludicrous. Traffic currently has to use house drive ways as lay-bys from the Eastern side of Kingsteps up to Derelochy. The road is steep with an S Bend at Derelochy where there have been numerous incidents with vehicles loosing control in freezing condition and in one accident, a 4 x 4 ended up crashing through the bridge parapet and ended upside down in the burn. School buses already have no safe areas to drop young children off. I hope the council uses common sense and insists that access be through the existing and current development area (NA5) for any outline or full planning approvals</p>

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04313	Name	Stewart Morrison	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2 - South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

Inner Moray Firth Proposed Local Development Plan Site: NA2 – South Kingsteps I write with reference to the above site proposed for inclusion in the IMFLDP. Whilst not completely opposed to some degree of housing development, I would like the following points to be considered and implemented if the site is to be adopted in the IMFLDP. Kingsteps is a historic rural settlement in it’s own rights and any development adjacent to this area needs to be sympathetic to ensure Kingsteps retains it’s individual identity. Accordingly; a. In it’s current format Lochloy Road is incapable of serving a development of an additional 90 houses and any attempt to improve/widen to achieve an access at the Eastern end of Kingsteps would completely disrupt the harmony of the historic Kingsteps hamlet. Lochloy Road is already running at capacity (or above it) and an additional 90 houses each with a minimum of 2 cars per household would render it unsafe. If any development whatsoever is granted for site NA2 then access should be taken via the current Springfield development and not from Lochloy Road. b. The implied housing density of 6+ houses per acre is not appropriate for site NA2’s semi-rural location. Housing densities should be consistent with the rural Kingsteps area where all properties are built on 0.5+ acre plots. Therefore housing density on the proposed site NA2 should be restricted to 2 houses per acre. c. No house building whatsoever should be permitted north of the Kingsteps burn which dissects the site. I would insist this is a condition of any future Planning consent to create a divide between any new housing and Kingsteps and to ensure Kingsteps retains it’s identity as a settlement in it’s own right. A landscaping proposal should also be agreed and implemented prior to any house construction commencing. It should incorporate a 20 – 25 metre wide dense planted zone along the northern boundary of site NA2 bordering Kingsteps to ensure Kingsteps retains it’s own separate identity.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04181	Name	Rick Stewart	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

I would like to make my representation clear that I am against this development in its current form and feel it will have a detrimental impact on the hamlet of Kingsteps and a negative effect on the Inner Moray Firth area.

Representation

Notification of Publication of Inner Moray Firth Proposed Local Development Plan Reference: Your letter Ref IMFLDP/PP/NN, October 2013 This is our first official notification regarding allocation of this land for development. I would like to make my representation clear that I am against this development in its current form and feel it will have a detrimental impact on the hamlet of Kingsteps and a negative effect on the Inner Moray Firth area. Kingsteps is a historic rural settlement in its own right and any development adjacent to this area needs to be sympathetic to ensure that Kingsteps retains its individual and special identity. I have noted our objections to specific points laid out in the Inner Moray Firth Local Development Plan (IMFLDP) below. IMFLDP Wording: Developments are similar in terms of its spacing, scale and density to development within or adjoining that existing settlement, including consideration of and respect for whether the local facility serves a wider dispersed rural settlement or concentrated village. Objection: The plan for 90 houses in an area of 6.3 hectare (15.75 acres) is completely out with the current housing density for Kingsteps and equates to a density of 0.07 hectare / house (0.1750 acres / house). The current Kingsteps property density is 0.20 hectare/house (0.5 acre/house plots therefore the proposed NA2 site should be restricted to 31.5 houses to be the same spacing, scale and density of the adjoining and existing settlement. IMFLDP Wording: Safeguards and developer requirements for a network of green spaces, corridors and path networks to protect habitats and species but also to allow people and wildlife to travel through these spaces and to co-exist. Objection: We feel the current development at NA5 bordering Kingsteps has not created a network of green spaces, corridors or trees as per the approved planning permission. We continue to suffer from noise and light pollution; associated crime and environmental destruction due to this ever increasing development adjacent to Kingsteps. The NA2 development with an additional 90 houses will reduce even further any existing network of green spaces, corridors for wild life and natural habitat. The entire area is quickly becoming an enormous suburban area devoid of natural green spaces. IMFLDP Wording: Green infrastructure consists of existing green spaces, walks, woodlands, other habitats, paths and cycle routes. Taken together these help form the Green Network which helps to create a sense of place by providing spaces to meet friends and neighbours, take part in sport, recreation and play while also making a significant contribution to the biodiversity of an area. There needs to be a buffer between the ever increasing number of houses built in Nairn such as NA-5 and the hamlet of Kingsteps. The NA5 development has an additional plan for 200 more homes and education and community buildings. The current NA2 proposals calls for Transport assessment; open space provision; primary school land safeguard; footpath/cycleway connections and linkages to wider area; landscaping and woodland replacement; Flood Risk Assessment; with avoidance of any adverse effect on the integrity of the inner Moray Firth. We have not seen these points being addressed in the current development. Currently the only attempt in forming a buffer between the two developments is earthworks being erected not trees as stipulated in the planning permission. IMFLDP Wording: New development allocated in this Plan must contribute to the delivery of more efficient forms of travel The planned devolvment at NA2 shows a single entrance / exit onto Lochloy road. In its current format Lochloy Road is incapable of servicing a development of its current requirement plus 90 additional houses. Any attempt to widen or improve this road would completely disrupt the harmony of the historic Kingsteps hamlet. The single access point will cause a traffic bottleneck and serious noise and traffic related pollution in Kingsteps where the total number of houses will increase from circa 20 to 110. The pressure on local transport will also be felt at the junction of the A96 where the increased traffic from the NA5 and other development in Nairn will cause that junction to be greatly congested. IMFLDP Wording: Green infrastructure consists of existing green spaces, walks, woodlands, other habitats, paths and cycle routes. Taken together these help form the Green Network which helps to create a sense of place by providing spaces to meet friends and neighbours, take part in sport, recreation and play while also making a significant contribution to the biodiversity of an area. In discussions with the Landowner prior to submission of the site for inclusion in the IMFLDP it was intimated that no house building was proposed north of the Kingsteps burn which dissects the NA2 site. We would insists that this is a condition of any future Planning consent to create a divide between any new building and Kingsteps to ensure Kingsteps retains its identity as a settlement in its own right.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04171	Name	Vivian Hardie	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	proposal for 90 houses	
Reference	NA2 South Kingsteps		Type	Change	Comment Late
					No

Comment Changes

To allow a considerably reduced development . To consider access to NA2 houses from the current Springfield development.

Representation

KINGSTEPS is a historic small semi- rural hamlet. ROAD It is a single/one and a half carriageway at best.There are several concealed driveways onto this already busy road, with private drives being used as passing places. Usage by walkers, horseriders,cyclists(it is a designated cycle route), forestry extraction and farm vehicles,motorhomes and caravans using the site at Druim; visitors to the Culbin sands,beaches and forest attractions at Cloddymoss and Wellhill ,and RSPB reserves. 90 houses with 2 cars each , plus visitors and service vehicles will put extra strain on an already busy road and the junction with the A96.Linkages to the wider area must be considered as per your Housing Plan. INFRASTRUCTURE. Increased pressure will be put on sewerage, water and waste water management. Clause 4.39 must be considered as per your Housing Plan. I understand that the water treatment plant is already working at almost full capacity. FLOOD RISK ASSESSMENT As a watercourse runs through the proposed site, a full and realistic assessment must be made. Extra housing with hard surfaces and loss of green space, could potentially impact heavily on this low lying and already boggy piece of land. Existing houses could be affected by flooding. Very much an issue currently. 4.41 identifies NA2 as a site with "potential adverse effect-in combination.. These sites will be required to ensure avoidance on any adverse effect on the integrity of IMF SPA/Ramsar....alone or in combination through satisfactory provision and/or contribution towards open space, path and green network requirements including mitigation associated with the Inverness and Nairn Coastal Trail. DENSITY There are currently 18 houses in Kingsteps, each on approximately 0.5 acre, some on larger plots.Consistency of development should follow this pattern. 90 houses on NA2 is 14.2 houses/hectare. On other proposed development sites , ie Lochloy ,Sandown and Delnies the proposed density is considerably less. The closest development at Lochloy has a density of 9.5 houses/hectare. In the long established settlement of Kingsteps , I submit the proposed density would be a gross overdevelopment of the site. The Local Plan 2000- continuing 2012 and still presumably extant until this proposed IMF Development Plan is adopted, states; P 17. Settlements and Services.-Rural townships..... limited consolidation is encouraged at..... (inter alia) Kingsteps P19 clause 7 village expansion..... the council will encourage development "CONSISTENT WITH THE SCALE AND CHARACTER OF RURAL SETTLEMENTS" I submit the scale of the proposed development does not constitute "limited consolidation" (of which there has already been a considerable amount) , but overdevelopment inconsistent with the scale and character of Kingsteps. It would be a great pity if the ethos in the 2000 Local Plan is superceded by large scale building to lose forever the uniqueness of Kingsteps. TRAFFIC The impact of increased vehicular activity through Kingsteps , Lochloy Road and channelled through Nairn, where the road infrastructure is already creaking at the seams, will be significant I submit further development should not be considered until the building of a by-pass, or improvements to the A96. CONCLUSION This site is unsuitable for a development of this nature. Other existing identified sites for housing with better ,easier and safer access should be developed before NA2 is considered

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04202	Name	Charles Andrews	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

a. Area NA2 should be reduced so as to incorporate only land lying to the south of the Kingsteps burn. b. A structural tree buffer running along the southern edge of the burn, to be planted before any construction takes place, should be included in IMFLDP. c. Access to NA2 south of the burn should only be via the NA4 development and not via Lochloy Road to the east of the Kingsteps settlement.

Representation

I write regarding the proposed extension of residential building onto area NA2 as shown in the current draft of IMFLDP. I am the owner of West Kingsteps, a house which shares a boundary with NA2 as currently proposed and I would like to make the following representation: a. Area NA2 should be reduced so as to incorporate only land lying to the south of the Kingsteps burn. This separation of new development from the existing settlement at Kingsteps will go some way towards preserving the character and identity of the latter, in line with the stated aims of the HWLDP. b. A structural tree buffer running along the southern edge of the burn, to be planted before any construction takes place, should be included in IMFLDP. This will reinforce the protection of the Kingsteps settlement. c. Access to NA2 south of the burn should only be via the NA4 development and not via Lochloy Road to the east of the Kingsteps settlement. The effect on the Kingsteps settlement of some 400 car journeys driving through it per day (90 two-car families making just one return journey per day) would be both dangerous and catastrophic in terms of loss of amenity for Kingsteps residents.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04202	Name	Charles Andrews	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	4.30		Type	Change	Comment Late
				No	

Comment Changes

In respect of a small in-fill area: Land allocation should please revert to that shown as Area 1 on Map 9 of the HWLDP.

Representation

Background: I am the owner of West Kingsteps, which covers both the black and the red areas on the attached map. Planning permission in principle has been granted to erect housing on the area shown in red (08/00105/OUTNA). The attached map is taken from planning application 07/00176/FULNA, made by the owners of the adjoining major development at Balmakeith. The developer has since built housing over much of the area marked “Site” on the map. The northernmost part of “Site”, bordering onto Lochloy Road, consists of a SUDS dam and an emergency access road. Both are already built and presumably are essential requirements for the development as a whole. This part of “Site” separates my land from the recreational area which has been converted from Kingsteps Quarry. The developer has recently applied for permission to extend “Site” towards the watercourse marked “Kingsteps Burn” on the attached map and HWLDP and IMFLDP both already incorporate the enlarged Site as Area 1 on Map 9 Nairn (p52) and Area NA5 (p65) respectively. Section 14.6.1. of HWLDP specifically details the extension up to the watercourse. In contrast, the current draft of IMFLDP has excluded the area in black from the land allocation marked as Area NA5 on map 4. Development Allocation Nairn (p65)

Representation: I would like to make a representation to include the area in black within NA5, as was previously shown in Area 1 on the HWLDP. Reasons: a. The Highland Council encourages the use of land by in-filling between existing developments. b. The fact that “Site” and the area in black are held under different ownerships should not make a difference to the development allocation of land. c. Planning permission in principle (08/00104/OUTNA) in respect of the area in black was refused, principally on the mistaken basis that it formed part of the Recreation Area. The Recreation Area has been completed and is separated from my land by “Site”. The Section 5/22(c) status, on which the refusal was based, has now been removed. d. A detailed review of any new planning application regarding the area in black must of course take place before any planning permission is granted. It would be unreasonable to prejudge the merits of such a planning application at this stage. e. The area in black is very small compared to the major changes to the previous master plan already incorporated into NA5. No preferential treatment should be extended to the much larger developer.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number 04216 Name Brian Stewart Organisation Nairn West, River and Suburban Community Councils - joi

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Nairn (paras 4.32 to 4.41 et seq)

Reference Site NA2 - South Kingsteps Type Change Comment Late No

Comment Changes

page 66, table entry for NA2 (and on page 65 map): delete and remove entirely.

Representation

See attached composite note of jointly-agreed CC comments, in particular Section 4, headed SOUTH KINGSTEPS (NA2) – objection: development not required and not appropriate. This site should be removed from the Plan, for several reasons. “Rounding-off” the eastern margin of the town (given in the MIR as a reason for allocation) is no justification for building over the green space and watercourse of this field which have amenity value. Building housing on this field would have implications for drainage. The indicative total of 90 units is totally unacceptable. This would substantially alter the current low-density-residential character of the existing Kingsteps houses. The total of new housing elsewhere built and approved (Lochloy), likely (Delnies) and allocated (Nairn South, Sandown, etc) renders this allocation superfluous. Access is a critical constraint. The capacity of the unclassified minor road to Brodie is limited. Access to this site through the existing Lochloy site NA5 (which itself has only one entry-point already serving some 600 houses) is inappropriate. If combined with a direct link out on to the Lochloy-Brodie road, this would create an obvious “ratrun”. This road – the sole access – leads only to an already problematic junction in Nairn, and eastward as a narrow rural road with no convenient connection to the A96. Unless and until the bypass route is confirmed and there is a vehicular linkage eastward from the Lochloy residential area on to the eventual A96 bypass, there should be no development on site NA2. The shape and orientation of any further development at the eastern edge of Nairn will depend on, and should await, the alignment and junction design of the proposed re-routed A96.

Allocated to Nairn NA2 South Kingsteps

Customer Number	04446	Name	George Sutherland	Organisation	
Agent Name amd Organisation (if applicable)		Lee Murphy		Harper Macleod LLP	
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

Change sought to Section 4 Development Allocation Removal of the Site NA2 South Kingsteps from the Proposed LDP

Representation

The inclusion of the Site NA2 is premature in the context of the existing infrastructure constraints in the location, particularly vehicular access. Not only is there little, if any, capacity at the Lochloy Road/A96 junction, the section of Lochloy Road between Montgomerie Drive and the Site is currently inadequate and unable to accommodate additional traffic flow. That section of the road would be unsuitable for the provision of emergency access for further development on NA5 Lochloy without significant and costly improvements. The Proposed LDP does not include a commitment or programme of improvements to the local road system, nor does the Transport Appraisal or other related documents provide any degree of certainty that the requisite works will be implemented in the lifetime of the Proposed LDP. The Proposed LDP states that the focus is on "where development should and should not occur in the Inner Moray Firth area over the next 10-20 years." Nonetheless, in terms of Scottish Government policy and guidance the IMF LDP should be in place for a period of 5 years only, although it is required to take a longer term view of potential development. In addition, in terms of the Scottish Government guidance and advice (regarding the allocation of housing sites and the inclusion of such sites in the housing land supply) only those sites which meet the criteria required to render a site as "effective" should be included in the housing land supply. Constraints Road Access - The site is landlocked save for the narrow strip of land extending northwards to the Lochloy Road at the north-eastern extremity of the site. The stretch of Lochloy Road from that point westwards to the junction with Montgomerie Drive is narrow, has a number of tight bends and is without pathway provision. It is currently severely constrained in terms of the road geometry and the topography; consequently current traffic levels give rise to safety concerns. Additional traffic on the stretch of road would exacerbate those road safety concerns for all road users: vehicle drivers, cyclists and pedestrians. The Transport Appraisal for the IMF Proposed LDP acknowledges that the level of cycling in Nairn is well above average (7%). The stretch of Lochloy Road referred to above forms part of National Cycle Route 1 and Eurovelo 1. These factors alone are sufficient to prevent access to the site being taken from Lochloy Road without significant and costly improvements to the stretch of the road referred to above. The proposed LDP refers to a notional capacity of 90 housing units. in the absence of an alternative access, Site NA2 is ineffective and should not be included in the housing allocation as there is no prospect of development within the lifetime of the Proposed LDP. Site NA5 Lochloy has potential to provide an alternative access to Site NA2. However there are significant constraints affecting the effectiveness of Site NA5, not least the existing traffic congestion experienced at the Lochloy Road A96 junction. It is considered that it is premature to allocate NA2 until it has been demonstrated that Site NA2 is effective. Flood - There is a history of flooding on the site. No evidence is available to demonstrate that the Site would be capable of development in accordance with both the current Scottish Planning Policy and the emerging Scottish Planning Policy. In the absence of evidence demonstrating that Site NA2 can be made capable of development during the lifetime of the Proposed LDP, all in accordance with current and emerging Scottish Planning Policy on flooding, the Site ought not to be included in the Proposed LDP. Drainage - There is evidence that the existing Treatment Plant is at capacity and will require to be upgraded in advance of further development. Acknowledgement of that status is included in Policy 4 in the Strategy for Growth Areas. This factor, along with the existing constraint on site access, serves to further diminish the prospect that Site NA2 is capable of becoming effective within 5 years. Other Factors Site NA2 is a greenfield site and there is no evidence to demonstrate that the Site can be developed within the required timescale. Accordingly the inclusion of the Site is not in accordance with paragraph 80 of the Scottish Planning Policy. In addition to the specific factors set out above it is considered that in allocating Site NA2 the planning authority has failed to take proper account of the extant policy, guidance and advice. Specific attention is drawn to the following elements and comments stated below as examples. Scottish Planning Policy Paragraph 15 - no likely sequence of development is set out in the Proposed LDP. Paragraph 38 - The decisions on new development are required to take account of a number of factors including the reduction of the need to travel, prioritise sustainable travel opportunities, promotion of sustainable travel opportunities and to prevent further development at risk from flooding. The inclusion of Site NA2 fails to do so. Specific policies on flooding are relevant to the inclusion of the Site in the Proposed LDP but are inadequately addressed in the overall context of Site NA2. Paragraph 77 - There is no context provided for development of Site NA2, particularly taking into account the access constraint and the need for improvement of the road network in the Nairn area generally. Paragraph 79 - In the absence of a satisfactory transport network including footpaths and cycle provision, the allocation of Site NA2 fails to demonstrate compliance with the policy. That failure is of particular significance given the constraints issues referred to above. Paragraph 80 - Site NA2 is a greenfield site and should not be allocated in preference to brownfield or other similar sites. There is no evidence that the Site can be developed within

the required timeframe owing to the current infrastructure constraints. Draft Scottish Planning Policy Principal Policies Paragraph 20 - The Proposed LDP does not provide any evidence to demonstrate that Site NA2 can be developed within the lifetime of the Proposed LDP. Building Policy Principles Paragraph 80, 90 and 91 - Maintaining a 5-year Effective Land Supply The Proposed LDP does not demonstrate that Site NA2 will become effective and free from constraints and effective or capable of development within five years of the adoption of the Proposed LDP or the lifetime of that LDP. Paragraph 92 - The Proposed LDP fails to set out the key actions necessary to bring Site NA2 forward for housing development, or to identify the lead partner. Planning Advice Note 2/2010 Paragraph 55 - Site NA2 cannot be considered to be effective in terms of the Advice set out in the Note as a consequence of the existing constraints and the absence of an effective strategy which has the reasonable prospect of removing those constraints within the lifetime of the Proposed LDP. The inclusion of Site NA2 does not assist in providing a realistic picture of the available land supply. The Proposed LDP does not include specific commitments to the removal of the physical constraints affecting the Site.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
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Agent Name amd Organisation (if applicable)		
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Section	Development Allocations	Paragraph	
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Reference	NA2	Type	Change	Comment Late	No
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Comment Changes

As per representation.

Representation

Page 66, NA2 South Kingsteps. There should be no further housing built to the east of Nairn until the transport links have been improved. This means a road from the A96, Balmakeith, over the railway line to link in with the current development being proposed.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04477	Name	Prof G. Sutherland, Dr R Sawers and Mrs E. Fr	Organisation	
Agent Name amd Organisation (if applicable)		Lee Murphy		Harper Macleod LLP	
Section	Development Allocations		Paragraph		
Reference	NA2	Type	Change	Comment Late	No

Comment Changes

Deletion of allocation

Representation

The inclusion of the Site NA2 is premature in the context of the ex1stmg infrastructure constraints in the location, particularly vehicular access. Not only is there little, if any, capacity at the Lochloy Road/ A96 junction, the section of Lochloy Road between Montgomerie Drive and the Site is currently inadequate and unable to accommodate additional traffic flow. That section of the road would be unsuitable for the provision of emergency access for further development on NA5 Lochloy without significant and costly improvements. The Proposed LDP does not include a commitment or programme of improvements to the local road system, nor does the Transport Appraisal or other related documents provide any degree of certainty that the requisite works will be implemented in the lifetime of the Proposed LDP. 1.2 The Proposed LDP states that the focus is on "where development should and should not occur in the Inner Moray Firth area over the next 10-20 years." Nonetheless, in terms of Scottish Goveernunt policy and guidance the IMF LDP should be in place for a period of 5 years only, although it is required to take a longer term view of potential development. In addition, in terms of the Scottish Goveernunt guidance and advice (regarding the allocation of housing sites and the inclusion of such sites in the housing land supply) only those sites which meet the criteria required to render a site as "effective" should be included in the housing land supply. Road access 2.1.1 The site is landlocked save for the narrow strip of land extending northwards to the Lochloy Road at the north-eastern extremity of the site. The stretch of Lochloy Road from that point westwards to the junction with Montgomerie Drive is narrow, has a number of tight bends and is without pavement provision. It is currently severely constrained in terms of the road geometry and the topography; consequently current traffic levels give rise to safety concerns. Additional traffic on the stretch of road would exacerbate those road safety concerns for all road users: vehicle drivers, cyclists and pedestrians. 2.1.2 The Transport Appraisal for the IMF Proposed LDP acknowledges that the level of cycling in Nairn is well above average (7%). The stretch ofLochloy Road referred to above forms part of National Cycle Route 1 and Eurovelo 1. These factors alone are sufficient to prevent access to the site being taken from Lochloy Road without significant and costly improvements to the stretch of the road referred to above. 2.1.3 The proposed LDP refers to a notional capacity of 90 housing units. In the absence of an alternative access, Site NA2 is ineffective and should not be included in the housing allocation as there is no prospect of development within the lifetime of the Proposed LDP. 2.1.4 Site NAS Lochloy has potential to provide an alternative access to Site NA2. However there are significant constraints affecting the effectiveness of Site NAS, not least the existing traffic congestion experienced at the Lochloy Road A96 junction. It is considered that it is premature to allocate NA2 until it has been demonstrated that Site NAS is effective. 2.2 Flood 2.2.1 There is a history of flooding on the site. No evidence is available to demonstrate that the Site would be capable of development in accordance with both the current Scottish Planning Policy and the emerging Scottish Planning Policy. In the absence of evidence demonstrating that Site NA2 can be made capable of development during the lifetime of the Proposed LDP, all in accordance with current and emerging Scottish Planning Policy on flooding, the Site ought not to be included in the Proposed LDP. 2.3 Drainage 2.3 .1 There is evidence that the existing Treatment Plant is at capacity and will require to be upgraded in advance of further development. Acknowledgement of that status is included in Policy 4 in the Strategy for Growth Areas. 2.3.2 This factor, along with the existing constraint on site access, serves to further diminish the prospect that Site NA2 is capable of becoming effective within 5 years. Policy Documents: Comments In addition to the specific factors set out above it is considered that in allocating Site NA2 the planning authority has failed to take proper account of the extant policy, guidance and advice.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

The area of the site North of the existing drainage burn was not to be proposed for building. The current landowners had intimated on at least two occasions that this piece of land would not be used for housing.

Representation

The site is low lying and has water drainage issues. Surface water lies there for most of the year. The burn running through the site should be retained. 1) For drainage of the land 2) For the good of the environment of the area i.e. tadpoles, birds, and other water wild life 3) There ought to be a buffer zone between the new housing and the present hamlet of Kingsteps. Buffer zones in the past in the area have not been strictly adhered to.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Any development of this site should reflect the nature of the adjoining houses in Kingsteps. Therefore a change of plan from 90 houses to 20 houses would be more appropriate.

Representation

This plan is of too high density for a semi rural area. It is a higher density than any other proposed development plan for Nairn. A development of 20 houses would be acceptable.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Removal of site NA2

Representation

PROPOSED DEVELOPMENT PLAN FOR NAIRN – SITE NA2 – KINGSTEPS. I am absolutely appalled at the thought of 90 houses in the small field at the back of my home. This is completely out of kilter with the rest of the area of Kingsteps which is composed of houses in half acre gardens. It is being proposed by the owner of the land who has no consideration for the existing residents and whose only concern is to make money from the prime agricultural land which she inherited. Also, the road through Kingsteps is unable to cope with the extra traffic that 90 extra houses would produce.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Change of access from Lochloy Road to site NA2. Access should be via Montgomery Drive.

Representation

Lochloy Road, through Kingsteps is a narrow road. The through traffic is made up of timber lorries, tractors, delivery vans, school buses plus the use of private vehicles from Kingsteps and beyond. Passing areas are not designated, therefore private driveways are used. Exit on to A96 from Lochloy Road at the junction at certain times results in long queues forming on Lochloy Road. This would be made worse by the addition of 90 plus more cars joining the exit to work. This would not be alleviated by the new proposed trunk road as traffic would still have to travel on Lochloy Road.

Allocated to

Customer Number	04225	Name	Hamish Clark	Organisation	
Agent Name amd Organisation (if applicable)					
Section	3.Strategy for Growth Areas		Paragraph		
Reference	NA2 - South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

New access avoiding Kingsteps Far fewer houses

Representation

NAIRN – DEVELOPMENT SITE NA2 – SOUTH KINGSTEPS Your Ref – IMFLDP/PP/NN Proposed Access The junction where the Lochloy Road meets the A96 can be very congested at peak times with tailbacks going as far back as Bona Vista Road. There should be a direct access route from the existing development (NA-5) over the railway line to meet with the A96 before consent is given for any more housing development in this area. The proposed access onto the Lochloy Road at the East end of Kingsteps is unsuitable for a development of this size, the road is a single track country road as is evident by the use of driveways for passing places. The Lochloy Road is part of the National Cycle Network and as such is regularly used by cyclists Horse Riders frequently use the route through Kingsteps from the nearby stables and paddocks for access to the beach Lorries and tractors frequently use this route to service the agricultural and forestry industries in the area. School bus route with a 48 seat bus taking pupils to school. The only sensible access to this site would be through the existing development at NA-5. Over development of the area The proposed site adjoins the existing rural housing forming Kingsteps (22 houses), consequently this should reflect the rural nature of the existing housing. Most of the houses in Kingsteps sit on at least 0.5 acre plots, some quite a bit more. Any development of the site should reflect the nature of the neighbouring properties in line with the Scottish Governments Planning Policy and advice. Noise pollution, traffic problems and over-development in the countryside are all arguments which the landowner of the proposed site has used to object to far smaller developments in this area, it would be somewhat ironic if these issues were overlooked when considering this application, which is totally out of character and unsuitable for Kingsteps.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04442	Name	Robert Sawers	Organisation	
Agent Name amd Organisation (if applicable)		Lee Murphy		Harper Macleod LLP	
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

Change sought to Section 4 Development Allocations Removal of the Site NA2 South Kingsteps from the Proposed LDP

Representation

The inclusion of the Site NA2 is premature in the context of the existing infrastructure constraints in the location, particularly vehicular access. Not only is there little, if any, capacity at the Lochloy Road/A96 junction, the section of Lochloy Road between Montgomerie Drive and the Site is currently inadequate and unable to accommodate additional traffic flow. That section of the road would be unsuitable for the provision of emergency access for further development on NA5 Lochloy without significant and costly improvements. The Proposed LDP does not include a commitment or programme of improvements to the local road system, nor does the Transport Appraisal or other related documents provide any degree of certainty that the requisite works will be implemented in the lifetime of the Proposed LDP. The Proposed LDP states that the focus is on "where development should and should not occur in the Inner Moray Firth area over the next 10-20 years." Nonetheless, in terms of Scottish Government policy and guidance the IMF LDP should be in place for a period of 5 years only, although it is required to take a longer term view of potential development. In addition, in terms of the Scottish Government guidance and advice (regarding the allocation of housing sites and the inclusion of such sites in the housing land supply) only those sites which meet the criteria required to render a site as "effective" should be included in the housing land supply. Constraints Road Access - The site is landlocked save for the narrow strip of land extending northwards to the Lochloy Road at the north-eastern extremity of the site. The stretch of Lochloy Road from that point westwards to the junction with Montgomerie Drive is narrow, has a number of tight bends and is without pathway provision. It is currently severely constrained in terms of the road geometry and the topography; consequently current traffic levels give rise to safety concerns. Additional traffic on the stretch of road would exacerbate those road safety concerns for all road users: vehicle drivers, cyclists and pedestrians. The Transport Appraisal for the IMF Proposed LDP acknowledges that the level of cycling in Nairn is well above average (7%). The stretch of Lochloy Road referred to above forms part of National Cycle Route 1 and Eurovelo 1. These factors alone are sufficient to prevent access to the site being taken from Lochloy Road without significant and costly improvements to the stretch of the road referred to above. The proposed LDP refers to a notional capacity of 90 housing units. in the absence of an alternative access, Site NA2 is ineffective and should not be included in the housing allocation as there is no prospect of development within the lifetime of the Proposed LDP. Site NA5 Lochloy has potential to provide an alternative access to Site NA2. However there are significant constraints affecting the effectiveness of Site NA5, not least the existing traffic congestion experienced at the Lochloy Road A96 junction. It is considered that it is premature to allocate NA2 until it has been demonstrated that Site NA2 is effective. Flood - There is a history of flooding on the site. No evidence is available to demonstrate that the Site would be capable of development in accordance with both the current Scottish Planning Policy and the emerging Scottish Planning Policy. In the absence of evidence demonstrating that Site NA2 can be made capable of development during the lifetime of the Proposed LDP, all in accordance with current and emerging Scottish Planning Policy on flooding, the Site ought not to be included in the Proposed LDP. Drainage - There is evidence that the existing Treatment Plant is at capacity and will require to be upgraded in advance of further development. Acknowledgement of that status is included in Policy 4 in the Strategy for Growth Areas. This factor, along with the existing constraint on site access, serves to further diminish the prospect that Site NA2 is capable of becoming effective within 5 years. Other Factors Site NA2 is a greenfield site and there is no evidence to demonstrate that the Site can be developed within the required timescale. Accordingly the inclusion of the Site is not in accordance with paragraph 80 of the Scottish Planning Policy. In addition to the specific factors set out above it is considered that in allocating Site NA2 the planning authority has failed to take proper account of the extant policy, guidance and advice. Specific attention is drawn to the following elements and comments stated below as examples. Scottish Planning Policy Paragraph 15 - no likely sequence of development is set out in the Proposed LDP. Paragraph 38 - The decisions on new development are required to take account of a number of factors including the reduction of the need to travel, prioritise sustainable travel opportunities, promotion of sustainable travel opportunities and to prevent further development at risk from flooding. The inclusion of Site NA2 fails to do so. Specific policies on flooding are relevant to the inclusion of the Site in the Proposed LDP but are inadequately addressed in the overall context of Site NA2. Paragraph 77 - There is no context provided for development of Site NA2, particularly taking into account the access constraint and the need for improvement of the road network in the Nairn area generally. Paragraph 79 - In the absence of a satisfactory transport network including footpaths and cycle provision, the allocation of Site NA2 fails to demonstrate compliance with the policy. That failure is of particular significance given the constraints issues referred to above. Paragraph 80 - Site NA2 is a greenfield site and should not be allocated in preference to brownfield or other similar sites. There is no evidence that the Site can be developed within

the required timeframe owing to the current infrastructure constraints. Draft Scottish Planning Policy Principal Policies Paragraph 20 - The Proposed LDP does not provide any evidence to demonstrate that Site NA2 can be developed within the lifetime of the Proposed LDP. Building Policy Principles Paragraph 80, 90 and 91 - Maintaining a 5-year Effective Land Supply The Proposed LDP does not demonstrate that Site NA2 will become effective and free from constraints and effective or capable of development within five years of the adoption of the Proposed LDP or the lifetime of that LDP. Paragraph 92 - The Proposed LDP fails to set out the key actions necessary to bring Site NA2 forward for housing development, or to identify the lead partner. Planning Advice Note 2/2010 Paragraph 55 - Site NA2 cannot be considered to be effective in terms of the Advice set out in the Note as a consequence of the existing constraints and the absence of an effective strategy which has the reasonable prospect of removing those constraints within the lifetime of the Proposed LDP. The inclusion of Site NA2 does not assist in providing a realistic picture of the available land supply. The Proposed LDP does not include specific commitments to the removal of the physical constraints affecting the Site.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04387	Name	Ronald Tunstall	Organisation	
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Agent Name amd Organisation (if applicable)		
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Section	4.Development Allocations	Paragraph	Soth Kingsteps NA2
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Reference	NA2	Type	Change	Comment Late	No
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Comment Changes

This is an objection to the proposed plan on the grounds of: Density Infrastructure Wildlife conservation

Representation

The proposed planning application to develop NA2 South Kingsteps concerns us as the proposed density of houses (90) would be out of character with existing properties in Kingsteps. The infrastructure - The proposed development would generate a major increase in the volume of traffic (approx. 180 cars based on 2 per household on a 90 house development). The road is already seeing an increased usage from the development at Montgomerie Drive which is not going to get any less. The road would require widening which would affect neighbouring properties - is the developer going to bear this cost? The access road from the proposed development meets Lochloy Road on a blind summit and an alternative route should be considered. There is a burn on the site which would need managed. Mains sewer would need increased to cope with housing levels. It should also be noted that this site borders what is marked as a badger conservation area. How would the badgers and their habitat be protected? This is over development of what is essentially a rural area of historic interest and should be protected as such.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	04404	Name	Elizabeth Fraser	Organisation	
Agent Name amd Organisation (if applicable)		Lee Murphy		Harper Macleod LLP	
Section	4.Development Allocations		Paragraph	4.41	
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

Change sought to Section 4 Development Allocations Removal of the Site NA2 South Kingsteps from the Proposed LDP

Representation

The inclusion of the Site NA2 is premature in the context of the existing infrastructure constraints in the location, particularly vehicular access. Not only is there little, if any, capacity at the Lochloy Road/A96 junction, the section of Lochloy Road between Montgomerie Drive and the Site is currently inadequate and unable to accommodate additional traffic flow. That section of the road would be unsuitable for the provision of emergency access for further development on NA5 Lochloy without significant and costly improvements. The Proposed LDP does not include a commitment or programme of improvements to the local road system, nor does the Transport Appraisal or other related documents provide any degree of certainty that the requisite works will be implemented in the lifetime of the Proposed LDP. The Proposed LDP states that the focus is on "where development should and should not occur in the Inner Moray Firth area over the next 10-20 years." Nonetheless, in terms of Scottish Government policy and guidance the IMF LDP should be in place for a period of 5 years only, although it is required to take a longer term view of potential development. In addition, in terms of the Scottish Government guidance and advice (regarding the allocation of housing sites and the inclusion of such sites in the housing land supply) only those sites which meet the criteria required to render a site as "effective" should be included in the housing land supply. Constraints Road Access - The site is landlocked save for the narrow strip of land extending northwards to the Lochloy Road at the north-eastern extremity of the site. The stretch of Lochloy Road from that point westwards to the junction with Montgomerie Drive is narrow, has a number of tight bends and is without pathway provision. It is currently severely constrained in terms of the road geometry and the topography; consequently current traffic levels give rise to safety concerns. 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However there are significant constraints affecting the effectiveness of Site NA5, not least the existing traffic congestion experienced at the Lochloy Road A96 junction. It is considered that it is premature to allocate NA2 until it has been demonstrated that Site NA2 is effective. Flood - There is a history of flooding on the site. No evidence is available to demonstrate that the Site would be capable of development in accordance with both the current Scottish Planning Policy and the emerging Scottish Planning Policy. In the absence of evidence demonstrating that Site NA2 can be made capable of development during the lifetime of the Proposed LDP, all in accordance with current and emerging Scottish Planning Policy on flooding, the Site ought not to be included in the Proposed LDP. Drainage - There is evidence that the existing Treatment Plant is at capacity and will require to be upgraded in advance of further development. Acknowledgement of that status is included in Policy 4 in the Strategy for Growth Areas. This factor, along with the existing constraint on site access, serves to further diminish the prospect that Site NA2 is capable of becoming effective within 5 years. Other Factors Site NA2 is a greenfield site and there is no evidence to demonstrate that the Site can be developed within the required timescale. Accordingly the inclusion of the Site is not in accordance with paragraph 80 of the Scottish Planning Policy. In addition to the specific factors set out above it is considered that in allocating Site NA2 the planning authority has failed to take proper account of the extant policy, guidance and advice. Specific attention is drawn to the following elements and comments stated below as examples. Scottish Planning Policy Paragraph 15 - no likely sequence of development is set out in the Proposed LDP. 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Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
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Agent Name amd Organisation (if applicable)		
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Section	4.Development Allocations	Paragraph	paras 432- to 4.41 and Site list
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Reference	NA2 - South Kingsteps	Type	Change	Comment Late	No
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Comment Changes

Remove/delete entirely form the list of sites allocated for Housing.
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Representation

This development is not required and not appropriate. There is sufficient capacity and choice in the other allocated sites (Lochloy, Delnies, Sandown and Nairn South, plus windfall). The land is a green space of amenity value to existing houses. A watercourse runs through it. 90 houses would be incompatible with the existing low-density surrounding Kingsteps houses. Access is a severe constraint: connecting through the existing Lochloy housing is inappropriate and would incite "ratrunning", and the minor road to Brodie is a single track with no A96 connection east and junction problems westwards. Development of this area - if ever permitted - should only be contemplated after the bypass is in place, the A96 dualled, and the area east of Nairn's current perimeter can be reviewed holistically in terms of the future expansion of the town. It should therefore not feature in LDP until after 2030.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

My Representation is an objection & I would like site NA2 removed from proposed plan. I would further like the proposed developement of site NA2 to not be approved in current form.

Representation

Over-development: Kingsteps is a semi-rural area with very low housing density totalling 18 houses. Proposed 90 new homes represents a 5x higher density and is totally incompatible as a result. Any housing north of the Kingsteps burn would compromise the integrity of Kingsteps and disregard green space undertakings and objectives of the plan

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

No development at NA2

Representation

The Lochloy development has already over-loaded the Road and traffic trying to get on to the A96. Before development at NA2 can be considered there needs to be a By pass or a Road Bridge over the railway to provide a second exit from Lochloy. 90 houses would be a gross overdevelopment of this small field.

Allocated to

Customer Number	04276	Name	Steven Jack	Organisation	
Agent Name amd Organisation (if applicable)					
Section	3.Strategy for Growth Areas		Paragraph		
Reference	NA2		Type	Change	Comment Late
				No	

Comment Changes

I wish to register my objection to the proposed inclusion of site NA2 to the plan would therefore like to seek removal of NA2 from the proposed plan

Representation

I wish to strongly oject to the proposed plan for the following reasons: Proposed Access: From Lochloy Road access is unsuitable for proposed development. This is a route already at capacity & incapable of safely accommodating additional vehicular traffic. Insufficient regard has been taken of current private, commercial & farm vehicle use & amenity pedestrian, cycle & equestrian use. A popular access to beach, culbin sands, culbin forest & beyond, single track sections, blind corners & high banked verges present a significant safety risk even with current volume of traffic. Current A96 junction to Lochloy Road currently incapable of safely accomodating increased volume of traffic without major investment & reconfiguring. A96 conjection through Nairn would be increased dramatically as a result of additional flow to & from Lochloy Road. Notwithstanding my objection to the proposed plan, I consider a thorough transport assessment is essential to determine risks presented by current usage and subsequently through additional volume demands.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	01010	Name	Wm. Morton Gillespie	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Page 66	
Reference	Site ref. NA2 South Kingsteps		Type	Change	Comment Late No

Comment Changes

Omit proposed site NA2 from the IMFDLP on the grounds that:- 1. the proposed development of 90 houses adjoining a rural settlement contravenes the Scottish Governments Planning Guidelines relative to rural settlements. 2. The proposed access to the site is unsuitable and does not meet the Highland Councils own standards for access to a development of the type and size proposed.

Representation

NAIRN – DEVELOPMENT SITE NA2 SOUTH KINGSTEPS I wish to raise the following issues in regard to the proposed development of Site NA2 South Kingsteps. The issues listed are all acceptable “material considerations” in accordance with the Scottish Governments published Guidance on Planning Issues and are particularly relevant to the sites rural location and impact of the proposed development on the existing settlement of Kingsteps. A. Proposed Access The proposed access to this site is totally unsuitable for the proposed development of ninety new houses. The existing road through Kingsteps is a narrow country road which is regularly used by both recreational and commercial traffic including but not limited to:- • Walkers (access to Culbin Forest) • Cyclists (it is a designated Sustran route from Inverness to Aberdeen and constitutes part of North Sea Cycle Route) • Horse riders (from nearby stables and horse grazing sites - as evidenced by the warning signs) • Farm traffic • Timber felling operations (serving Culbin woods) • Access to the existing designated caravan site beyond Kingsteps • Access to the commercial nursery operation beyond Kingsteps • School bus route. These uses are in addition to normal road traffic accessing existing housing. The road leading to and through Kingsteps is effectively a single track road as evidenced by the use of private access drives as passing places. The existing road through Kingsteps does not comply with the Councils published “Roads and Transport Guidelines for New Developments” in terms of road width, provision for pedestrian footpaths, drainage, access for fire vehicles and refuse collection, school bus access etc. etc. and consequently would not be acceptable to the Councils own Roads Department as an access route to a new housing development. (Refer to “Geometric requirements for rural road links”) The Road Engineers estimated additional capacity of this access road to take a further 90 houses is flawed and does not reflect the nature and usage of the road. The only feasible access to the proposed development is through the existing Lochloy housing development accessed from Lochloy Road via Montgomery drive. No access from Kingsteps should be permitted – even as a “secondary” access. B. Adequacy of existing Infrastructure Nairn Road Network:- It is recognised that as stated in the draft Development Plan that the existing road network through Nairn and via the A96 trunk road is incapable of taking additional road traffic and any future development of Nairn is subject to the provision of the Nairn by-pass and upgrading of the A96 trunk road to Inverness. Any development of site NA2 will result in all traffic being routed onto the A96 via Lochloy Road with further pressure on this road which has various danger spots along with the A96 through the town centre. The sensible option would be to develop of direct access route over the railway line to access the A96 - it is understood that this was in fact one of the considerations and planning requirement for the Lochloy development however it has never been discharged together with other planning conditions and the Council have permitted the continued phased housing development. C. Sewage, Drainage and Water Services It is understood that the existing waste water treatment plant is currently operating close to its full capacity. D. Suitability of the Site for Development The site is low lying and has a history of surface water drainage issues – it is therefore essential that the existing water courses through the site are fully retained. The need to retain these water courses will have a significant impact on any proposed development of the site. Any development of the site will result in significant increased run off and any modifications to the existing water courses will result an increased flooding risk. The site with its mature trees and existing winding route of the stream provides an effective natural wildlife and amenity area which warrants its retention and protection from development. In terms of wildlife the site and adjoining woods are currently inhabited by a variety of recognised protected wildlife including:- • Red Squirrels • Badgers • Bats • Sparrow hawks • Merlin • Buzzards The presence of these can be confirmed by appointing an Ecologist to undertake a study of the area as a pre condition of any future development. The site is currently used for horse grazing and as such it provides an effective “buffer” zone between the large housing development of Lochloy and the rural settlement of Kingsteps. Its retention will provide an appropriate amenity area serving both Kingsteps and the Lochloy housing. E. Overdevelopment of the Site The site adjoins the existing rural housing forming Kingsteps (a total of 18 houses) consequently any proposed development should reflect the rural nature of the existing settlement and the low density of the existing housing. The Plan proposes that 90 houses are built on the site which equates to a housing density of 14.28 houses/hectare. This equates to 450% higher density than the existing housing in Kingsteps and is some 50% greater than the existing adjacent housing development in Lochloy estate. It is a higher density than that proposed in the Plan for other development sites around Nairn Sandown = 10.15/hectare Lochloy = 9.52/hectare Delnies = 11/hectare The proposed density of housing for the South

Kingsteps site of 14.28 houses/hectare is an overdevelopment of this rural site and takes no recognition of the nature of the adjoining houses in Kingsteps. A development of this density and urban nature is in contravention of the Scottish Governments Planning Guidelines relevant to rural locations. Any development of the site should reflect the nature of the neighbouring properties in line with the Scottish Government's Planning Policy and advice. Conclusion The site is not appropriate for the type of development proposed and should be retained as an amenity area in order to preserve the rural nature of the existing settlement.

Allocated to Nairn NA2 South Kingsteps

Customer Number 04226 Name Dean Clark Organisation

Agent Name amd Organisation (if applicable)

Section 2.Guiding and Delivering Development Paragraph

Reference NA2 - South Kingsteps Type Change Comment Late No

Comment Changes

Different access not through Kingsteps Less housing density

Representation

NAIRN – DEVELOPMENT SITE NA2 – SOUTH KINGSTEPS Your Ref – IMFLDP/PP/NN Proposed Access The junction where the Lochloy Road meets the A96 can be very congested at peak times with tailbacks going as far back as Bona Vista Road. There should be a direct access route from the existing development (NA-5) over the railway line to meet with the A96 before consent is given for any more housing development in this area. The proposed access onto the Lochloy Road at the East end of Kingsteps is unsuitable for a development of this size, the road is a single track country road as is evident by the use of driveways for passing places. The Lochloy Road is part of the National Cycle Network and as such is regularly used by cyclists Horse Riders frequently use the route through Kingsteps from the nearby stables and paddocks for access to the beach Lorries and tractors frequently use this route to service the agricultural and forestry industries in the area. School bus route with a 48 seat bus taking pupils to school. The only sensible access to this site would be through the existing development at NA-5. Over development of the area The proposed site adjoins the existing rural housing forming Kingsteps (22 houses), consequently this should reflect the rural nature of the existing housing. Most of the houses in Kingsteps sit on at least 0.5 acre plots, some quite a bit more. Any development of the site should reflect the nature of the neighbouring properties in line with the Scottish Governments Planning Policy and advice.

Allocated to Nairn NA2 South Kingsteps

Customer Number	04228	Name	Rhonda Dawson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA2 South Kingsteps		Type	Change	Comment Late
				No	

Comment Changes

The access to this development should not be through Kingsteps onto Lochloy Road. It would be more appropriate to have a direct connection from the development to the A96.

Representation

At present Lochloy Road, especially the section through Kingsteps, is unfit for the extra traffic that 90 houses would generate. I feel there should be no more housing development in the Lochloy/Kingsteps area until the potential traffic problem is looked at and a new road is built to service these developments. Currently the line of the road before and through Kingsteps is narrow with several bends. In addition the visability splays of the current houses are limited and further traffic would increase the risk of accidents for vehicles and pedestrians alike. The developers should have to agree to finance and construct a new road prior to any planning permission being given. The current road network through and around Nairn is already heavily congested and I don't think any more planning permission for houses in Nairn should be given, until the congestion problem is solved, by means of a bypass or removal of several sets of traffic lights.

Allocated to	Nairn	NA2	South Kingsteps	
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Customer Number	03948	Name	Colin Young	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Nairn Para 4.41	
Reference	NA3		Type	Support	Comment Late
				No	

Comment Changes

Representation

This shows a proposal for just 6 houses. The site is shown as 17.9 hectares. Will there be any addition to the 6 houses in future or is this it? Where exactly in the site will the 6 houses be located?

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	00912	Name	Mr W MacLeod	Organisation	
Agent Name amd Organisation (if applicable)		Natasha Douglas		Ryden LLP	
Section	4.Development Allocations		Paragraph		
Reference	NA3		Type	Change	Comment Late

Comment Changes

NA3 to be deleted from the proposed LDP and its allocation transferred to land at Fort Reay.

Representation

What is the specific change you would like to see in the final Plan? It is requested that the allocation given to NA3 in the proposed LDP is transferred to land at Fort Reay. Site NA3 was allocated as site reference S2 within the Nairnshire Local Plan 2000 however, it has not come forward for development. As per guidance contained in Scottish Planning Policy Highland Council should 'focus on what has changed, for example the extent to which key assumptions remain valid, whether land allocations have proved viable' (paragraph 20). It is evident that the allocation at NA3 is no longer valid; had it been an application for planning permission would have been submitted. Accordingly the allocation should be removed from the Plan and the allocation transferred to land at Fort Reay. Transferring the allocation to Fort Reay, which is deliverable in the short term, would contribute to the housing land requirements stated in the Highland wide Local Development Plan (HwLDP).

Allocated to	Nairn	NA3	Achareidh
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA3 Achareidh		Type	Change	Comment Late

Comment Changes

Generally supportive of the inclusion of this site for LIMITED additional housing - ie the 6 houses indicated. The two change would be in the Requirements, to insert "in consultation with the local community" after 'development brief' in the first line, and at the end "and be subject to explicit restriction or prohibition of any further housing development on the site".

Representation

The recommendation to include consultation with the community as an explicit requirement is both a reflection of the new policy approach of Community engagement and empowerment in the CERB; and also because this site is a significant area of green space with a historic listed building and so is of wider importance to the community of Nairn. Further more dense or extensive housing development would be unacceptable, and could sensibly be discouraged by conditions.

Allocated to	Nairn	NA3	Achareidh
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Customer Number	01194	Name	Mr Ronald Gordon	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	NA3		Type	Change	Comment Late
				No	

Comment Changes

Delete “housing capacity 6” and replace with ”housing capacity to be determined by a masterplan”.

Representation

Grounds of Objection

1. The Achareidh Estate is allocated for housing and coloured brown on the Proposals Map. No change is sought to the Proposals Map and the allocation should be confirmed in the Plan.

2. That reflects its status in the MIR as a “preferred site (H2)”; and it is understood, the joint Community Council’s view of Achareidh as a development site. The Schedule 4 summary of responses does not appear to raise any opposition to the principle of a masterplan approach. That should be respected by the planning authority.

3. However, the capacity of the site as expressed in the PLDP - 6 houses - bears no understanding of its potential for development; nor of the masterplan process or the factors that would inform the quality of development and the setting the proponents would aspire to.

4. The potential of Achareidh Estate has been presented as comprising primarily three fields in agricultural use as a working farm, mature amenity woodland, treed margins, commercial plantations, and a Category B Listed Building and its large, partially-walled garden.

5. These factors represent a fine heritage providing a context which will require a high standard of sympathetic design to integrate with it.

6. In order to achieve this, the development would be subject to a masterplan, underpinned by specialist input, providing a landscape capacity approach, an architectural concept and access details. This will contribute to the aim of producing a sensitive design and layout within, and respecting, the setting.

7. A masterplan would cover the entirety of the estate, avoiding a piecemeal approach, but enabling flexibility in terms of the location and “take” of land for development.

8. The site is an integrated part of the town, well located to facilities, connected within 400m of public transport, adjacent to a structural cycle route, within 50m of the national road network, and existing infrastructure. It is wholly compatible with the principles of “urban sustainability”, and would enhance the townscape character, and the town’s economic and social prosperity.

9. The site will respond to part of the housing market that is not satisfied at present and extend choice locally; there are limited opportunities for consolidating the town within its existing structure.

10. The Achareidh Estate is perhaps an exception within the Inner Moray Firth area in that it is situated within a key centre, within a historic town and heritage setting, lies within the A96 corridor and is close to Inverness and the airport, national road and rail transport systems. Consequently, it offers important market appeal which perhaps does not exist elsewhere in the plan area.

11. It presents a distinctly different opportunity to the expansive large scale, long-term land stocks peripheral to Nairn that are dependent on resolving major infrastructure, land assembly, landowner co-operation and phasing issues.

Case: Capacity

12. The PLDP offers no justification for the capacity it envisages; but refers to a “set limit to development”. Such a fixed position is contrary to the masterplan process the planning authority promotes, and is presumptuous of any transport or conservation or other assessment that might inform it.

13. Given a “site area” of “17.9 ha.”; the “housing capacity: 6” is completely awry with any reasonable assessment of the development potential. Insofar this is an expression of density, it would give approximately one house per 3.0 ha, and even if applied to the open fields only, one house per 1.3 ha. This bears no comparison with any other site in an urban situation the Inner Moray Firth Local Development Plan.

14. For example, NA1 Housing Capacity indicates 30 houses on 1.8 ha. of land, in a parkland setting; NA2 indicates 90 houses on 6.3 ha. of land; NA 4 350 homes on 34 ha. of land; NA5 Lochloy, 200 homes on 27 ha. of land. As regards Achareidh, this is an inefficient response by the planning authority (see para. 21 below).

15. The PLDP capacity bears no relation to the potential of the Estate for development; even accepting fully the need to respect “...the fabric and setting of the listed building, transport assessment, retention of woodland...” all of which were identified by the proponents. All of these factors would, and must be carefully considered, supported by evidence and informed appraisal. Representations [see documents below] were lodged to the MIR that encouraged the planning authority to guard against a presumptuous judgement where a development footprint would be determined by evidence drawn capacity studies.

16. As the planning authority presents no justification for its “set limit”, the proponents wish to present the following in relation to factors that would inform the extent, placement and scale of development; none of which pre-determines a “set limit”. These indicate precisely that it is the masterplan process that would facilitate full and proper assimilation of such matters with the heritage; informed by pre-application public consultation that would by statute be required in this case:

- that the A96/Tradespark Road junction is capable of being reconfigured within the Estate land; that Transport Scotland accept its reconfiguration in principle and that the design capacity of such improvement could serve up to 30 houses at present. This would achieve a very substantial improvement at an important substandard junction to the A96(T). An A96 by-pass could reduce through traffic and increase the capacity of that reconfigured junction to serve additional development in the long term;
- such improvements would affect the gate-lodge, but that building is owned by the Estate, is 450m remote from Achareidh House, outwith its defined “grounds” and not visible from the main house. It was extended - with planning

permission in 2006, did not require Listed Building Consent; was not advertised as affecting the setting of a Listed Building; nor was it the subject of comment by Historic Scotland. Consideration could be given to relocating it at an appropriate position within a layout or re-using its materials, were that to be an outcome of a masterplan process; • that there is a choice of access routes to the A96 and towards the town centre - in two directions utilising the existing road network. Achareidh Estate enjoys an unimpeded 1000 m/1 km frontage to Tradespark Road and Altonburn Road and thus the potential for improvement to those routes including the Tradespark Road/Altonburn Lane junction. The extent and/or requirement for improvements - and the combination and timing of measures - is properly for consideration as part of a masterplan; • in the Appeal P/PPA/270/632 into refusal of 550 houses at Sandown (west of Achareidh) the Reporters concluded in the context of concerns about “rat-running” through the Tradespark Road/Altonburn Lane network that “the relative attractiveness of alleged rat-run could be reduced substantially by detailed road layout and speed restriction measures... Indeed we note the Council’s final position as being that careful consideration would be required for this aspect of the scheme rather than outright opposition”. That would indicate capacity within the existing road network, notwithstanding the existing A96/Tradespark Road junction”. • in the context of an A96 junction improvement, it is understood the Council would see some benefit in the principle of stopping-up the existing network at an appropriate place. listed building and setting • that the Achareidh policies are part of a registered farm unit. That status and use prevailed in 1982 when Achareidh House was listed; • that the fields are distinct and different from Achareidh House, the stables to the rear, the walled garden (to the ha-ha), greenhouse, cottage and two outbuildings, tennis court and the gate/pillars that would reasonably represent the focus of the curtilage of the Listed Building. This is an integrated composition that derives immediate context from the enclosing woodland. However much the interface of development and the listed building may include open land as part of the setting, the fields are very different in use and character to that composition; and for that they present a development opportunity greater than the PLDP recognises; • that as there is no statutory definition of “curtilage” or “setting”, advice is contained in the Scottish Historic Environment Policy Appendix 1. However much “authorities are encouraged not to interpret setting narrowly”, the fields are not “lawn or grassland for walks and riding” but rather fully fenced for stock/grazings or ploughed, seen from the main house rather than for the pleasure of its occupants (as referred in Appendix 1). In any event, a conservation appraisal would inform a masterplan; • that the Estate is not an “Inventory of Gardens and Designed Landscapes” site; that a tree felling/management programme within the allocation is approved by the Forestry Commission; and that substantial potential exists for replacement tree planting were that to be considered integral to a masterplan.. Scottish Planning Policy 2010 17. Scottish Planning Policy 2010 (para.110) states that the “SPP, the SHEP and the Managing Change in the Historic Environment guidance note series published by Historic Scotland should be taken into account by planning authorities when preparing development plans...”. There is no indication that the planning authority has done so, otherwise it would have balanced the following. 18. At (para. 111) SPP states “in most cases, the historic environment can accommodate change which is informed and sensitively managed, and can be adapted to accommodate new uses whilst retaining its special character. ...Decisions should be based on a clear understanding of the importance of the heritage assets. Planning authorities should support the best viable use that is compatible with the fabric, setting and character of the historic environment”. The planning authority has rejected that premise without a clear understanding of the heritage, and it has pre-empted what could be the most viable outcome. 19. At (para. 112) it states “Development plans should provide the framework for the protection, conservation and enhancement of all elements of the historic environment to allow the assessment of the impact of proposed development on the historic environment and its setting”. The planning authority is pre-empting that assessment of impact, despite having declared that to be the purpose of a masterplan. 20. “Authorities should also consider whether further and more detailed assessment is required to establish the capacity of an area and its sensitivity to change” (para. 112). The planning authority is seeking transport and conservation assessments even though it has decided a “set limit to development”. That is completely awry in process, and devoid of appreciation of the circumstances of the site. 21. At (para. 80) SPP states “Planning authorities should promote the efficient use of land and buildings, directing development towards sites within existing settlements where it is possible to make effective use of existing infrastructure and service capacity and to reduce energy consumption”. The PLDP capacity is not efficient or effective. 22. At (para. 81) it states “Planning authorities are encouraged to use urban capacity studies... to inform the settlement strategy. Where possible, planning authorities should involve the private sector in urban capacity studies”. The allocation of a substantial land holding for development with a completely disproportionate “set limit to development”, is contrary to the rational process, efficient and effective land use outcome that a masterplan would deliver. Conclusion 23. The land is allocated for housing. There is no justification for a “set limit to development” nor that that limit is 6 houses, either or both would indicate no understanding of the development potential, be contrary to the masterplan process promoted and premature to the evidence that would require to inform the scale and placement of development. 24. A masterplan should be comprehensive, considered and not presumed; present a balanced proposal of high quality, and embrace development, accessibility and the heritage as the public appears also to expect. That is the purpose of the allocation of Achareidh Estate on the Proposals Map; and it should be what a masterplan aims to deliver. That would inform the correct outcome. Recommendation It is recommended that “housing capacity 6” is deleted and replaced with “housing capacity to be determined by a masterplan”.

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	04014	Name	Alison Miller	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference			Type	Change	Comment Late
				No	

Comment Changes

Clarity

Representation

I would like to know where the access to this site would be regarding the placement of 6 houses/ all surrounding roads are very narrow and already a rat race at times., any further traffic would obviously cause more problems and I would appreciate more information. I am objecting to the proposal as it stands as there is just not enough information in order to understand despite talking to Highland Council.

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA3		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

NA3.Achareidh. Any proposed development should include the upgrading of Tradspark Road, road widening and a footpath on both sides of the road along with the Altonburn as required.

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	03966	Name	Gavin Mackintosh	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA3		Type	Change	Comment Late
				No	

Comment Changes

Objection for the plan to erect 6 homes in NA3 - Achareidgh.

Representation

This land and trees are a haven of wildlife. Deer, Badgers, Owls, Foxes and most importantly the Red Squirrel. However if the homes were at a suitable distance from the tree line and the tree line remained un-affected I may not have the same concerns. I would also like to notify SNH regarding the protection of the Red Squirrel habitat.

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	03940	Name	Angela Boyle	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA3		Type	Change	Comment Late
				No	

Comment Changes

Objection to development on green space NA3-Achareidh Impacts negatively upon the green space and beauty of Nairn which is a major part of attracting tourism to the area. Also displays utter disregard for the wildlife in this section, e.g, red squirrel, deer.

Representation

Home owner

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	NA3	
Reference	NA3		Type	Change	Comment Late
				No	

Comment Changes

Your present assessment of capacity at 6 is very low. I was advised by the planners that this was a "guess" as they did not know the site.

Representation

This is a very suitable location for housing. The owner of the land should be encouraged to bring forward proposals to develop the site. There is a sizable area of land that could be used for housing with out any problem.

Allocated to	Nairn	NA3	Achareidh	
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Customer Number	04042	Name	Heather Corran	Organisation	
Agent Name amd Organisation (if applicable)					
Section	2.Guiding and Delivering Development		Paragraph		
Reference	NA4 -Sandown		Type	Change	Comment Late
				No	

Comment Changes

I find this form quite unsuitable for a response. It does, however, illustrate how disinterested THC are in any opinions on development of the 'Inner Moray Firth' other than their own. President Putin would probably be very glad to engage the services of THC in his government. The objections that were put forward at the previous attempt to desecrate the Common Good Lands of Sandown still stand. If you have conveniently forgotton what they were, then perhaps you should read the file. 350 houses: too too many. Land could be used for long term employment uses, not speculative building which caused the current economic crisis. Whatever happened to the proposed wetlands project? Has it been quietly shelved?

Representation

The proposed plan is flawed from it's very inception. 2000 words are not sufficient to mount a proper response. Nairn requires sustainable solutions, there are NONE in this plan, short terminism rules. The jargon contained in this proposal only serves to disguise the lack of imagination, innovation, and leadership of THC

Allocated to	Nairn	NA4	Sandown	
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Customer Number 04216 Name Brian Stewart Organisation Nairn West, River and Suburban Community Councils - joi

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Nairn (general) paras 4.32-41 pp 63-67

Reference Site NA4 - Sandown Common Good Lands Type Change Comment Late No

Comment Changes

Page 66, table entry for NA4 Requirements: insert “revised and updated” before “Sandown Development Brief”. In second sentence, delete “Developer” and insert “CG Trustees, in consultation with developers and local community” after “detailed masterplan”. After “Supplementary Guidance” insert “The site should be offered for development in subdivided lots over a period of time to ensure diversity of design and function. After “Flood Risk Assessment” insert “preservation of wetlands habitat and associated amenities.”. Add at the end, “avoidance of adverse impact on landscape and views especially in relation to the Moray Firth coast.”

Representation

See attached note of jointly agreed comments for explanation and confirmation of requested amendments, in particular Section 5, headed, SANDOWN COMMON GOOD LANDS (NA4) The Development Brief requires revision and updating – not least to reflect more clearly, and to avoid any prejudice to, the opportunity for a possible excambion with the existing Showfield (NA1). There should be sufficient flexibility to allow for a reconfiguration of the allocations of land within the site for different purposes. The site is very large. It should be subdivided and offered for development in smaller parcels phased over a period of time, to afford local developers and even individuals the opportunity to build and also to ensure diversity of design, architecture and functions across the site. As this is Common Good land, the masterplan should be led by the Trustees (not a developer) and subject to consultation with the community. Given the importance of the watercourse and wetlands, and the general requirement to have regard for the impact of development on landscape and natural environment, these factors should be explicitly mentioned in the Requirements.

Allocated to Nairn NA4 Sandown

Customer Number 04486 Name Alasdair MacLennan Organisation

Agent Name amd Organisation (if applicable)

Section Development Allocations Paragraph

Reference NA4 Type Change Comment Late No

Comment Changes

Change to developer requirements

Representation

With reference to the “Notification of Publication of Inner Moray Firth Proposed Local Development Plan”, location Site NA4 – Sandown, we would like to make the following comments. 1 That the number of homes does not exceed the 350 stated. 2 That buildings on the field immediately to the North of Wyvis Road and south of the A96 are restricted to single story. 3 Houses immediately to the North of the A96 should be no more than 2 story. We do not want our house to be devalued as a result of this development and we do not want to see the approach to Nairn blighted by high and unsightly development.

Allocated to Nairn NA4 Sandown

Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 to 4.41	
Reference	NA4		Type	Change	Comment Late No

Comment Changes

This site should be considered in smaller sections. Waiting for a major developer to take it on is unacceptable.

Representation

The Sandown Land needs to be developed. This is Common Good Land and should be developed to provide the funding for other projects in Nairn. The site should be split into smaller more manageable sections in order that development can get underway.

Allocated to	Nairn	NA4	Sandown
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	paras 4.32 to 4.41 and site list	
Reference	NA4 - Sandown Common Good land		Type	Change	Comment Late No

Comment Changes

in Requirements, insert "revised and updated" before 'Sandown Development Brief'. Also in first line, delete 'Developer' and insert "Common Good Trustees in consultation with developers and local community". insert after Flood Risk Assessment, "and preservation of wetlands". at the end add, "avoidance of adverse effect on landscape and coastal amenity"

Representation

The suggested changes are self-explanatory. The development brief needs to reflect in more positive terms and detail the excambion option with NA1. As this is Common Good Land the trustees, not developers, should take the lead in masterplanning. References to protection of wetlands and landscape are essential given the particular characteristics of the site.

Allocated to	Nairn	NA4	Sandown
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Customer Number	04364	Name	Katharine Rist	Organisation	Woodland Trust
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA4		Type	Change	Comment Late
				No	

Comment Changes

Woodland Trust has previously commented on this application. Long standing woodland has been felled at NH904568. This area has been wooded since at least the first ordinance survey maps. Rehabilitation of this area and exclusion from housing preferred.

Representation

The Woodland Trust Scotland considers that any woodland included in Scottish Natural Heritage’s Ancient Woodland Inventory (AWI) which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and is therefore high value for conservation and worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. Highland Council supplementary guidance notes that woodlands and trees offer multiple benefits in terms of addressing climate change, improving the water environment, providing valuable habitats, timber industry and creating recreational opportunities. Considerations include the cumulative impact of woodland removal, and fragmentation of habitat. Both Scottish Government policy and the Highland Wide LDP policy create a presumption in favour of protecting woodland. The Highland Wide LDP in policy 57 recognises ancient woodland as (depending on the category) of regional or national importance. Both the Woodland Trust Scotland and Scottish Planning Policy at para 148 consider ancient and semi natural woodland to be an important and irreplaceable national resource and should be protected and enhanced. The Woodland Trust Scotland would like to see a clear statement that the loss of ancient woodland cannot be mitigated, and therefore warrants protection from development. Development impacts on ancient woodland in a number of ways including chemically, disturbance by human activity, fragmentation, and colonisation of non-native plants. The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Allocated to	Nairn	NA4	Sandown	
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Customer Number	03996	Name	GARY BLACK	Organisation	
Agent Name amd Organisation (if applicable)					
Section	1.Introduction		Paragraph	Public access to A96	
Reference	NA5 - Lochloy		Type	Change	Comment Late No

Comment Changes

Road or footbridge crossing to access A96

Representation

The Highland Council are keen to promote a greener community with less use of cars and re-cycling which I am totally in support of. It has become a major issue now in this area that the only access to the A96 is along Lochloy Road. A footbridge across the railway line would enable many who work or wish to use the facilities in Balmakeith Industrial Estate i.e. Sainsbury. A new road to access the A9 would be a major improvement and would cut down congestion at the Lochloy/A96 I have been told that a foot bridge across the rail line was on previous development plans in this area. I have not seen anything in writing or mapped so I am only going on local comments. I apologise if this is incorrect but would like it to be considered for future developement.

Allocated to	Nairn	NA5	Lochloy	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA5		Type	Change	Comment Late No

Comment Changes

As per representation.

Representation

Page 66, NA2 South Kingsteps. There should be no further housing built to the east of Nairn until the transport links have been improved. This means a road from the A96, Balmakeith, over the railway line to link in with the current development being proposed.

Allocated to	Nairn	NA5	Lochloy	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

NAIRN: Response to letter sent to residents NA5: Dwellings to the North of Montgomerie Drive and immediately south of Kingsteps should be single story. This is in keeping with the build design of the current homes (formely known as Kylauren). Springfield have proposed double story properties to be erected in this particualr area and is not with keeping with current design

Representation

NAIRN: Response to letter sent to residents NA5: Dwellings to the North of Montgomerie Drive and immediately south of Kingsteps should be single story. This is in keeping with the build design of the current homes (formely known as Kylauren). Springfield have proposed double story properties to be erected in this particualr area and is not with keeping with current design

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Increased capacity for housing.

Representation

To maximise the efficient land use in terms of housing density.

Allocated to

Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 to 4.41 and site list	
Reference	NA5 - Lochloy		Type	Change	Comment Late No

Comment Changes

Add at beginning of Requirements "Delivery of all elements of infrastructure, amenities, and access identiified as conditions for development of this site as a whole, including...." Add to list of requirements after 'wider area' " a suitable crossing of the railway for pedestrians, cycles and possibly vehicles to enable access to the current or re-routed A96.

Representation

It is not acceptable, nor good planning, to permit further development of the remainder of the Lochloy site without ensuring that ALL the associated infrastructure and other amenties and upgrades are being delivered. The requirement for a crossing (bridge/tunnel?) of the railway is incumbent upon the Lochloy developers. There is no justification for transferring the obligation on to the developers of the Balmakeith industrial area since this access option is for the use of Lochloy residents, rather than Balmakeith businesses.

Allocated to	Nairn	NA5	Lochloy	
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Customer Number	04216	Name	Brian Stewart	Organisation	Nairn West, River and Suburban Community Councils - joi
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Nairn (paras 4.32-41 et seq, pp 63-67	
Reference	Site NA5 Lochloy and NA11 Balmakeith		Type	Change	Comment Late No

Comment Changes

page 66, table entry for NA5 Requirements – after “wider area”, insert “including provision of a suitable crossing (bridge/tunnel?) of the railway line to give access to Balmakeith and beyond.” Page 67 table entry for Balmakeith (NA11) – amend Requirement to read “In collaboration with Lochloy housing developers, pedestrian/cycle/vehicular access between Lochloy and A96/bypass to be included in planning”.

Representation

See attached composite note of agreed CC comments, for explanation and confirmation of requested amendments, in particular Section 6, headed LOCHLOY (NA5) The final stage of this extensive development should reflect the need to deliver the essential infrastructure requirements that were placed as conditions on the earlier phases and have not yet been put in place. Principal among these, and to ensure clarity over the wider-area linkages required, access across the railway (at least for pedestrians and cyclists and preferably for vehicles) to Balmakeith and thence to the existing A96 should be identified explicitly. Delivery of this should be not only a precondition for South Kingsteps (NA2 - see above) but a requirement on the Lochloy developers (past and present). It is wrong to transfer the obligation to future developers of the Balmakeith industrial park (NA11).

Allocated to	Nairn	NA5	Lochloy	
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Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 - 4.41	
Reference	NA5		Type	Support	Comment Late No

Comment Changes

Representation

Lochloy is a good development and the standard of housing being built should be maintained. The lack of infrastructure that has been provided is a poor reflection on the Planning authority and our local councillors. The problems at the Lochloy / A96 junction need to be addressed.

Allocated to	Nairn	NA5	Lochloy	
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Customer Number	04128	Name	Sebastian Woodward	Organisation	Springfield Properties Plc.
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NA5 - Lochloy		Type	Support	Comment Late No

Comment Changes

Representation

Springfield Properties support this site allocation and look forward to seeing it pushed through the examination process and included in the final adopted version of the Inner Moray Firth Local Development Plan.

Allocated to	Nairn	NA5	Lochloy	
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Customer Number 04216 Name Brian Stewart Organisation Nairn West, River and Suburban Community Councils - joi

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Nairn, paras 4.32-41 et seq, pp 63-67

Reference Delnies, Site NA6 Type Change Comment Late No

Comment Changes

Page 66, table entry for NA6. Under Uses, delete “Industrial, insert “Leisure/recreation”. In Requirements, amend to begin “Development will not be for housing alone, but will be subject to explicit agreement on the timely development and delivery of leisure facilities and recreational green spaces.” After “wider area” insert “in particular unfettered access and wherever possible shared infrastructure with any developments on the adjacent Sandown site (NA4).”

Representation

See attached composite note of comments for explanation and confirmation of requested amendments, in particular Section 7, headed, DELNIES (NA6) Priority use should be tourism, recreation and public open/green space, as foreseen in the previous Local Plan, and as in the landowner/developer’s own masterplans, which indicated “leisure/tourism” allocation and facilities. If housing is to be included, this should be as a subordinate element of the overall development; and if housing is approved as an early phase, there must be explicit conditionality over the subsequent delivery of the non-housing “leisure” elements. Just as the Sandown site incorporates a requirement to take account of access and infrastructure to Delnies, this obligation should be reciprocal.

Allocated to Nairn NA6 Delnies

Customer Number 01264 Name Cawdor Farming No.1 Partnership Organisation Cawdor Farming No.1 Partnership

Agent Name amd Organisation (if applicable) Mr Angus McNicol Cawdor Estates

Section 4.Development Allocations Paragraph 4.37

Reference NA6, NA8 and NA9 Type Change Comment Late No

Comment Changes

The mixed use allocation at Delnies, Nairn under site reference NA6 is fully supported. Whilst no objection is made to allocations NA8 and NA9 at South Nairn, the Plan should be altered to permit development west of and adjacent to Delnies NA6 in the circumstances where allocations NA8 and/or NA9 are unable to meet land supply requirements. This change could be inserted at the end of paragraph 4.37 where a potential restriction to the long term land supply at Nairn South is identified.

Representation

The reasons for this proposed change are as follows:- 1. This will allow the Council to meet its land requirements should the development at South Nairn be restricted due to the access issues that have been documented in para 4.37 of the proposed plan (as above) and also in the adopted Highland Wide Local Development Plan paragraphs 14.12.1 and 14.13.1. 2. The land at Delnies to the west of NA6 is in a relatively advantageous position with regards to access being situated adjacent to the A96 (T) and could be developed without the need for a bypass. 3. Scope for additional development to the west of NA6 at Delnies is identified in the adopted Highland Wide Local Development Plan (Policy 17) and indeed the plans for the NA6 allocation currently being prepared allow for potential further expansion to the west.

Allocated to Nairn NA6 Delnies

Customer Number	04023	Name	Jane Reid	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.36	
Reference	NA6, NA4		Type	Support	Comment Late
					No

Comment Changes

Representation

Nairn West provides better access to Inverness, surely the only source of emplyment for the potential home owners. there is no impact upon industry; no bottlenecks with the railway bridge, no additional traffic congestion twice a day through the town. There is also room for infrastructure improvements in that direction - shops and a new primary school which will surely be needed. it also does not require the by pass to be constructed befor eit becomes feasible.

Allocated to	Nairn	NA6	Delnies	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	para 4.32 to 4.41 and site list	
Reference	NA6 - Delnies		Type	Change	Comment Late
					No

Comment Changes

in the Site listing on p 66, under Uses, delete "Industrial" and insert "Leisure/recreation" Under Requirements, after 'open space provision' insert "leisure and recreational facilities"

Representation

The previous Local Plan, and the developer/landowners' masterplan, envisaged the development of this land primarily for leisure and recreation. There were references to nature park, equestrian facilities, a golf course and associated amenities, a hotel/leisure complex and tourism-related development. Housing was indicated as a minor element, and industrial development did not feature. If housing is to be built at an early stage, there must be clear conditions as to the delivery within a defined and reasonable timescale of the other components of the plan.

Allocated to	Nairn	NA6	Delnies	
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Customer Number	00365	Name	Mr Brian Stewart	Organisation	Nairn West Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	paras 4.32 to 4.41 and site lists	
Reference	NA7 Town centre		Type	Change	Comment Late No

Comment Changes

The site-area on the map (p 65) (which appears already to have a dotted blue line around but larger than the NA7 area) should be widened to embrace the High Street and Harbour Street, rivermouth and marina area. In the Requirements, amend to read "in accordance with a revised, updated and expanded brief which sets out a holistic vision for the central part of Nairn extending from the harbour to Leopold Street and from the river to Viewfield, and taking account of current and future Conservation Area prospects and the eventual re-routing of the A96. This will include uses that.... [continue as existing text]"

Representation

It makes no sense to have a development brief which considers only that limited part of the town centre of which a substantial part is currently dedicated to car-parking. An effective regeneration plan must take a comprehensive overview of the layout, functions and access arrangements for the entire heart of the town, in order to devise suitable proposals for enhancing the viability of the area, generating greater footfall, maintaining the visual appeal of the historic buildings and linking the retail zone of the High Street more dynamically to the recreational zone of the harbour, caravan park and Links. Part of this may involve revisiting the suggestion in the previous Local Plan of Conservation status for parts of the High Street. By definition this task cannot be left to "a developer", since not all of the site or properties will be (re)developed. Much of the plan will have to fit in with, and incorporate, current structures and functions. The planning authority should aim to mobilise and reflect the views of the local community in drawing up the regeneration strategy. The plans should comply with the principles set out in current planning guidance such as Designing Places, in PAN59, and in the Malcolm Fraser Review.

Allocated to	Nairn	NA7	Town centre	
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Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 - 4.41	
Reference	NA7		Type	Support	Comment Late No

Comment Changes

As per representation.

Representation

Regeneration of the Town Centre is the top priority for the town.

Allocated to	Nairn	NA7	Town centre	
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Customer Number04024NameJohn ReidOrganisation

Agent Name amd Organisation (if applicable)

Section4.Development AllocationsParagraph

ReferenceNA8TypeChangeComment LateNo

Comment Changes

NO DEVELOPMENT in the NA8 (Nairn South) area until the difficulties outlined in Section 5 have ALL been RESOLVED (changes made, not just plans, proposals or ideas)

Representation

Talk about flogging a dead horse! Do the planners at the Highland Council not remember that just a few weeks ago the latest in a series of planning applications for development of the NA8 area was soundly rejected by the people of Nairn? And that was all the town's residents, not just the neighbours. The town's residents are not against the concept of development per se, but if, and only if, a sound case for it can be put forward. But, there should be NO DEVELOPMENT IN THE NA8 AREA until, AT LEAST: 1) Nairn bypass is COMPLETE, 2) the problem of the road bottleneck at the railway station is SOLVED, 3) traffic flow to/from Nairn hospital is RESOLVED, 4) School capacity can cope (it can't - more schools must be built FIRST), 5) hospital capacity can cope (it can't with the present size of the hospital - the hospital must have more capacity FIRST), and 6) the people of Nairn are convinced that development in the NA8 area is in NAIRN'S BEST INTERESTS (not just a planner's dream of allowing development where none can logically, economically and practicaly be a demonstratable sound proposition). Try to do a little joined-up thinking for a change! If the rest of the Inner Moray Firth Development Plan is as poorly thought through as this small section (NA8) was, the planner's efforts will be laughed out of court by the people who live anywhere near. Planning for hundreds (thousands?) of new homes without the demonstrable prospects of employment for the owners/tenants is just wishful thinking. The modern world has changed in the last few years, and the prospects for a return to the glory days of huge development prospects are very small. There will be growth, but not on anything like the scale of past decades. Plan (if you must) for REALISTIC growth - very slow and very limited - in the next decade or so. Graniose plans, such as this one, are not what the punters want, or need. Get real, you guys, and look to see where the world is headed - and it isn't to a place where plans such as this make any sense!

Allocated toNairnNA8Nairn South

Customer Number 04216 Name Brian Stewart Organisation Nairn West, River and Suburban Community Councils - joi

Agent Name amd Organisation (if applicable)

Section 4.Development Allocations Paragraph Nairn, paras 4.32-41 et seq, pp 63-67

Reference Sites NA8/NA9 - Nairn South Type Change Comment Late No

Comment Changes

Page 67, table entries for NA8 and NA9 – redraft entire text to reflect comments in Representation section and attached document, OR at the beginning of the Requirements for each, insert, “Development to be on the basis of a revised Strategic Masterplan to incorporate necessary transport and infrastructure upgrades, to include more precise guidance on housing numbers and phasing, to give greater weight to the sawmill’s requirements, and to take account of the bypass alignment when agreed. Development also subject to up-to-date transport assessment;....etc” [text continues as in present draft]. Page 67, table entry for NA12 (Sawmill expansion) – after “accordance” insert “with a revised Nairn South Strategic Masterplan (to be prepared in consultation with the sawmill owners) which gives greater weight to the needs of the operation and those who access it, and recognises the need for generous separation between this industrial operation and any residential development in the vicinity.”

Representation

See attached composite note of comments for explanation and confirmation of requested amendments, in particular Section 8 headed, NAIRN SOUTH (NA8/NA9) The Nairn South Strategic Masterplan – which drew heavily on the proposals put forward by one developer group whose application has since been refused – is no longer a credible basis for planning on this site and needs substantial rewriting.. As now recognised by the Council itself, the infrastructure and access constraints are a serious obstacle to development in present circumstances. Any development that is permitted should consist of mixed use from the outset, with housing within the limits prescribed by the HwLDP Reporter (250 in early phases). The phasing should be gradual, and working outwards from the existing perimeter of the town. It should deliver necessary transport infrastructure improvements (such as bridge over railway, and road modifications) prior to other development. The evolution of the A96/Bypass planning, with the setting-aside of the existing broadly-agreed bypass route and the presentation of several new alignment options for consideration (none of which at present incorporates new or improved access into Nairn South) is a further reason for a reassessment of the approach to Nairn South development planning which takes a more realistic and comprehensive approach to the issues of transport, access, and other infrastructure including water and drainage. The proposals for a substantial expansion of housing-development at Cawdor (sites CA 1-10) will result in a much heavier volume of traffic on the B9090 Cawdor Road which will have consequences for the railway-bridge bottleneck and add to the capacity problem. The solution will to a large extent depend on whether and how any intersection is designed between Cawdor Road and the bypass. The particular requirements (and local impact) of the sawmill’s current operations and expansion plans point to a redefinition of the development-objectives for this site. Much greater weight needs to be attached to the sawmill’s role and its current and future needs. As this area is a ‘mixed use’ allocation, and subject to careful study of the scope for links with the eventually-agreed bypass and upgrading of the local rural roads, there is a strong case for stipulating a larger buffer-zone, revised access to the industrial site, and the earmarking of the northern part of the site for business, commercial or even light-industrial development , with any housing located further from the industrial premises.

Allocated to Nairn NA8 Nairn South

Customer Number	01837	Name	L G Kerr	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.32 to 4.41	
Reference	NA8		Type	Change	Comment Late
					No

Comment Changes

No development at this location until all of the concerns regarding infrastructure have been resolved.

Representation

The main road into the town under the railway bridge must be brought up to full standard before any development can be started. This is a School Route and it is presently dangerous. Gordons sawmill must be protected. Move the housing development well clear of the mill and of the proposed expansion zone. The existing foulwater system requires to be upgraged before any further development in this area.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	01232	Name	Mr Charles Allenby	Organisation	
Agent Name amd Organisation (if applicable)		Mr Robert Evans		Muir Smith Evans	
Section	4.Development Allocations		Paragraph	Page 63	
Reference	NA 8 Nairn South		Type	Change	Comment Late
				No	

Comment Changes

Site : NA8 Nairn South Area 9 (ha): 25.9 Uses: 520 homes (250 in Phase 1A); business, retail and community Requirements: Development to be in accordance with the phasing set out below to limit development in the first phase to 250 units and include local access and transport improvements to both Balblair Road and Cawdor Road; provision of a rail/cycle bridge across the railway; identification of green network and appropriate footpath/cyclepath connections; provision of link road between Balblair Road and Cawdor Road; open space provision; education developer contributions; landscaping; consideration of potential heritage impacts; provision of a recreational access management plan; avoidance of unacceptable adverse effect on the integrity of the inner Moray Firth SPA/Ramsar. ■ Phase 1a) 220 units and mixed uses ■ Phase 1b) 100 units and mixed uses ■ Phase 2a) 100 units ■ Phase 2b) 100 units

Representation

NA8 does not accord with the phasing set out by the Nairn South Strategic Masterplan nor set out the infrastructure requirements associated with development. It provides insufficient guidance or clarity and could lead to sporadic or isolated patterns of development that are not well linked physically or functionally to the existing urban structure of the town. The IMFLDP does not adequately define the phasing of development in line with allocations as required by Highland Wide Local Development Plan and the Nairn South Masterplan and does not respond to concerns expressed by the local community and Development Control decisions taken by Highland Council. The wording is too vague and should be more specific to avoid ambiguity or misinterpretation. We submit that the Nairn South Masterplan prepared by Highland Council does not adequately reflect the findings of the Reporter from HWLDP or the views of the local community and therefore suggest that aspects of the Nairn South Masterplan are clarified and reviewed as part of the Inner Moray Firth Local Development Plan in particular in relation to: ■ Phasing of development; ■ Limit on the number of houses within the first phase of development; ■ Access and infrastructure improvements required during early phases of development; and, ■ Review of the extent of development of Nairn South. Mr Allenby’s application for Planning Permission in Principle remains before Highland Council. The application site lies within and forms part of NA8. The application proposal is for a mixed use development of 250 homes, community uses, local/neighbourhood retail facilities and business and commercial uses. The application also includes a pedestrian & cycle bridge over the railway to serve Nairn Academy and the surrounding area and a west – east link road between Balblair Road and Cawdor Road as well as suggested improvements to Balblair Road. The application also includes a strong landscape buffer to contain development and avoid poorly sited development on the ridgeline to the south of the site and provides an area for potential expansion of existing commercial uses. The proposal is for 250 houses within the wider proposed allocation of NA8. The application site includes part of the Scotia Consortium site to provide a link through to Cawdor Road to the east. Mr Allenby’s vision is for a more modest scale and form of development that finds solutions to the issues raised by the local community at the start of the development process or prior to commencement of development by means of suspensive planning conditions. See fig ALLE001 We consider that the exact boundary lines for phasing require further examination and should be consistent with government guidance and advice. We submit that the appropriate way forward to progress this allocation through the more detailed Inner Moray Firth Local Development Plan (IMFLDP) is to progress a masterplan based on further public consultation and feedback from the Community Councils. Mr Allenby has consistently promoted a plan led approach to development in Nairn South. This approach has been supported by Highland Council. The Scotia planning application was a detailed planning application including detailed house types and design – based on fairly standard house types of the main consortium members but did not include any mixed uses and the site is physically separate from the edge of Nairn. House numbers and phasing are not consistent with the Nairn South Masterplan. In addition, the detailed layout, alignment of development parcels and geometry of the Scotia application are not consistent with the phasing required by the Nairn South Masterplan. It would not be possible to deliver the phasing suggested by the Nairn South Masterplan through the detailed Scotia layout. Despite this, it was recommended for approval by planning officers subject to suggested conditions that required development of phases consistent with the Nairn South Masterplan and setting maximum numbers for each successive phase of development. The proposed conditions directly contradicted the detailed design and layout plans because what was submitted did not align or accord with the boundaries as set out in the Nairn South Masterplan. In contrast, Mr Allenby’s proposal is consistent with the numbers and with the boundaries of the Nairn South Masterplan. The key point of difference is the suggestion as part of this submission that the phasing is revisited so that local roads and access issues, including the new pedestrian and cycle bridge over the railway to the academy, should be provided at an earlier phase of development. The masterplan should fully reflect the findings made by the Reporter from the HWLDP, key planning guidance and advice from Scottish Government and

examples of good practice from elsewhere as well as the views of the local community and consultation with the relevant Community Councils. Robert Maslin, Scottish Government Reporter to the HWLDP concluded that “The residential component of the first phase will be strictly limited to 250 houses,” and provides a clear limit of maximum site capacity which we fully support. This level of housing is considered sympathetic to the landscape and is consistent with the existing character of the area reflecting the edge of settlement location of the site linking the urban and rural environments. The Reporter also makes specific reference to the Transportation Assessments and analysis undertaken to date assessing the potential limit of development in the first phase of Nairn South before significant additional infrastructure improvements or a by-pass is required. The limit of 250 units is on the basis of potential improvements required (beyond that already completed) to the railway under-bridge which probably requires installing traffic signals. However, we also suggest that the following is required as an initial phase of development:

- Improving pedestrian footways and traffic calming along Balblair Road;
- Introducing a one way system with local access only along Balblair Road;
- Providing the footbridge/cycle bridge over the railway;
- Upgrading the Cawdor Road railway bridge with further safety measures;
- Providing a local distributor road between Cawdor Road and Balblair Road;
- Establishing structure planting to define and contain future development in Nairn South;
- Upgrading and relocating the sawmill access;
- Providing community allotments; and,
- Providing open space and footpath/cyclepath links to the surrounding areas.

Nairn South needs to be developed at an appropriate density to ensure a successful transition between rural and urban. Design should be specific to Nairn and Designing Streets should form a basis for good practice in calming traffic and creating a strong sense of place and well-designed public spaces. It should not be a high density reproduction of other more central parts of the town centre. The site is on the edge of the settlement and requires a sensitive approach to design. Lower density development is in keeping with the location and character of the area and will engender a successful town expansion and encapture a feeling of place and which will protect and enhance the setting of the town and its existing landscape features. See figure ALLE 0002

Our approach has always been centred upon the need for a comprehensive masterplan for Nairn South. Following the publication of the Reporter’s findings and the adoption of the HWLDP; the Nairn South Masterplan and the recent refusal of the Scotia Consortium planning application we have reviewed our masterplan. We submit that this is endorsed by the Inner Moray Firth Local Development Plan as a further iteration of the Nairn South Masterplan to better reflect community views and to respond to local access and infrastructure issues. Our approach is preferred by the Community Councils as it delivers improvements to local infrastructure at the start of the development process and provides better linkages with the surrounding areas. The Inner Moray Firth Local Development Plan should therefore provide more specific guidance and design principles for the masterplan and phasing of Nairn South as follows:

- A mixed but overall a low density of development that suits the edge of town and country setting of Nairn South;
- A limit of numbers within successive phases of development;
- Housing will be for a mix of family units including affordable provision for all sectors of the community provided throughout the development;
- A mixed development including a range of business, commercial, retail and community facilities, not just housing;
- A pedestrian and cycle link and bridge over the railway to the town centre as an early phase of development;
- A development that respects the landform, landscape features and setting to provide a strong and contained edge to the settlement;
- Local access and transport improvements to Balblair Road and Cawdor Road;
- To provide for reasonable expansion of existing commercial uses such as the sawmill; and,
- To provide a link between Cawdor Road and Balblair Road.

Context for IMFLDP is provided by the HWLDP. It states that “to meet the identified gross housing land requirement for the Nairn area, land allocations have been brought forward to offer choice and flexibility in the land supply. Taken together the land now identified in the Nairn area has the capacity to meet the following housing requirements across all sites.” Table 3: Potential distribution of development to meet Housing Land Requirement in the Nairn Housing Market Area allocates 330units between 2011 and 2021 and a further 600units between 2021 and 2031. In addition, the text accompanying NA8 is insufficient guidance in terms of basic infrastructure requirements, phasing, limits on numbers and appears to simply reflect previously submitted development proposals that have already been refused planning permission by Highland Council. Phase 1 of development should contain development within a strong landscape setting, provide for a bridge over the railway and expansion of the sawmill. This should be based on starting development at the edge of the urban area and working out rather than the alternative as suggested to develop early phases that are physically detached from the edge of the settlement. This is consistent with views previously expressed by Nairn West Community Council. Also, the southern extent of phase 1a) should be limited from that shown below in the Masterplan to respect and recognise the existing landscape features and to limit development unconnected with the town. We request that more detail is provided by IMFLDP to inform the successive phasing of development and specific infrastructure requirements. This should evolve from the Nairn South Masterplan to provide a better context for development of Phase 1 of Nairn South. See figure ALLE 0004; ALLE 0005 and ALLE 0006

It is essential that initial phases of development should include provision of the new pedestrian/cycle bridge across the railway, improvements to Balblair Road and the sawmill access and the link road between Balblair Road and Cawdor Road as well as enhancement of the railway underbridge on Cawdor Road. Such measures should be included as a direct response to community concerns expressed and the phasing of the Nairn South Masterplan should therefore be reviewed to reflect this. The illustrative masterplan demonstrates how this could fit within the wider context and how development could be shaped within the landscape. This is consistent with HWLDP but requires phasing to be amended to ensure the provision of key infrastructure as development proceeds. The phasing shown below is for Phases 1 (a & b) and 2 (a & b) with a strict limit of 250 within the initial phase of development (Phase 1a). The IMFLDP should include the phases and boundaries as suggested below. See figure ALLE 0007

The Allenby development framework completes the requirement for a masterplan approach for the initial phase of the Nairn South area that is consistent with government advice and the Reporter’s recommendations and conclusions. This includes a mixed use development including community uses, open space, local neighbourhood retail, business units, limited to a total of 220 houses (including affordable) within the first phase of development within NA8, pedestrian and cycle bridge across the railway, local distributor link road between Balblair Road and Cawdor Road and 5.1ha sawmill expansion with appropriate noise mitigation including bund to ramp

for bridge, landscaping, buildings and planting.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	01031	Name	John Gordon And Son	Organisation	
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	NA8		Type	Change	Comment Late
					No

Comment Changes

Summary only, elaborated at Section 5. The IMFLDP should: (1) reaffirm that any allocation of land is subject to consideration of transport and infrastructure and any first phase should not exceed 250 units (NA8/9); (2) reflect Transport Scotland confirmation that a by-pass access to Nairn South is feasible in principle, specify grade-separated form at developer expense, and requirement to serve the sawmill (NA8/9); (3) state any future allocation of land or planning application to be subject of a structural open space review; the deliverability of any such facilities to give added separation to the sawmill; and confirm this as an action for supplementary guidance (NA8); (4) specify “a 20-30m set back of development from Balblair Road” (NA8/9); (5) state “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill expansion area to be provided by developers should be a minimum of 35m-wide” (NA8).

Representation

Grounds of Objection Our client has participated fully in the Local Development Plan, the Nairn South Strategic Masterplan including in the “collaborative approach between all interested parties” the Council has promoted, and in the planning applications (11/04355/FUL) and (13/01276/PIP). Their interests are referred under the PLDP reference “INDUSTRY NA 12 Sawmill Expansion”, but are not adequately represented in that regard. The future of the sawmill is affected by development at Nairn South. This objection is to the PLDP provisions relating to NA8 and NA9. This objection should be read in conjunction with objections to NA8 and NA12 on behalf of John Gordon & Son. The Council is therefore fully aware of the critical impacts and potential conflicts that development at Nairn South poses for the future of the sawmill and the economy of Nairn. It is absolutely vital that appropriate provisions are made to safeguard the sawmill and its potential for development. Critical to this are (1) the operating effects of the sawmill, at present and as part of the proposed expansion, and the requirement on developers/landowners at Nairn South for an appropriate buffer, separation distance and noise attenuation measures; and (2) the need for developers/landowners at Nairn South to deal appropriately with the transportation requirements of the sawmill as an existing, long established strategic land use. In the light of two planning applications affecting land at Nairn South [one refused (11/04355/FUL) and one to be determined (13/01276/PIP)]; our client lodges the following grounds of objection to the PLDP. Nairn South (NA8) 1. The allocation of land at Nairn South for mixed uses but primarily housing (and any planning permission that would derive as a result) will have a profound impact on the sawmill, by defining its potential for expansion per se and land-locking the site for all time. Consequently, and as a result of operational emissions including from noise and transport which are integral to the sawmill, the proximity of future (residential and other) occupiers could constrain the business and its prospects for expansion. 2. Notwithstanding the Strategic Masterplan, there are three factors that,- in the course of the representations John Gordon & Son has made, have not been fully considered and/or assimilated to the extent that the sawmill is adequately protected. These are matters that have either not - it is believed - been considered from the outset; or have emerged in the latter stages of the Strategic Masterplan and subsequent to it. 3. These therefore remain factors for the Local Development Plan since they refer to the use of land and policy. In that regard, it is not satisfactory that the PLDP requires “development in accordance with Nairn South Strategic Masterplan”. Expansion - Uses 4. The PLDP should state - in view of the sawmill activities, its heavy industrial nature and the provision being made in three successive development plans (Nairnshire Local Plan, Highland-wide Local Development Plan and Inner Moray Firth Local Development Plan) for expansion - that adequate separation of residential and other development from the south-west edge of the land allocated for expansion of the sawmill, should be a prerequisite of development proposals at Nairn South. 5. In that regard, no material change has occurred in the layout and extent of (11/04355/FUL) and (13/01276/PIP) since pre-application consultation; and these proposals continue to feed roads into a “buffer area” such that it could serve development beyond the 250 and 319 dwellings proposed. Uses other than residential are not immune to noise, nor according to the position of the environmental health authority, immune to raising complaint, against which the Council is obliged to act. 6. It is essential therefore that in addition to the provision the Strategic Masterplan makes for a buffer and noise mitigation by developers, that any other reasonable planning outcomes which could reduce the potential for conflict between any future occupiers at Nairn South and the sawmill, are fully and properly accounted for and implemented. Noise/Buffer 7. The PLDP does not refer to a “buffer area” at all either in relation to Nairn South (NA8/NA9) or the sawmill (NA12); whereas it refers to other “requirements” which were also part of the Strategic Masterplan. That is selective and inconsistent. The “buffer area” is - in the context of Nairn South and the separation it could give to residential development by a 35m-wide earth-bund which was recommended as a condition had (11/04355/FUL) been approved - a strategic land use. As the

Strategic Masterplan refers, the responsibility rests with developers at Nairn South to recognise the uses in the existing sawmill and its expansion area, and deal with their effects to the extent that will (as the planning authority declares in its Strategic Masterplan Representations Appendix) “...prevent future complaints of noise nuisance...”. 8. Notwithstanding, the environmental health authority whilst setting the parameters for developer mitigation is unable to guarantee that any future complaint in the interests of residential amenity may not lead to action against the perpetrator of that nuisance ie. the sawmill, in terms that could constrain its operation, operating hours and any proposed use of the land allocated for expansion. That is a very significant risk that undermines a business investing substantial sums in the local economy and supporting 100 jobs. The sawmill is and has been the subject of complaint and action by the environmental health authority. 9. The circumstances arising from refusal of (11/04355/FUL) offer an opportunity to redress that matter in terms that are practical and efficient, and sustainable use of land. It is not clear that any of the underpinnings of the development plan (but certainly not the Strategic Masterplan) - all of which provide for substantial urban expansion of Nairn (upwards of 2,000 houses) - include any assessment of the need for structural recreational open space. 10. Nairn is not overly provided for in sports pitches and land adjacent to a “buffer area” could provide extra set back for development at Nairn South whilst being identified for structural playing fields. There is no evidence that that exercise has been done in the interests of the recreational needs of the town. If such facilities were provided adjacent to a “buffer”, it would also, importantly for the sawmill and future Nairn South occupiers, lessen the prospect that its operations might be incompatible and raise nuisance concerns that could be damaging to the prosperity of the business, Nairn and the local economy. Transport - Balblair Road Set Back 11. Balblair Road will not function as a residential street. It will be an urban distributor route with a special role carrying up to 130 HGV movements per day expected to rise to 165 when approved expansion plans are fully operating. The principles of a set back of residential development from Balblair Road, separated by strong landscaping, should have been an essential precedent for the masterplan, but does not appear to have been considered further to John Gordon & Son representations dated 3rd September 2012 and 8th March 2013. 12. This set back should form an appropriate green corridor either side to minimise the impact of intense, regular daily HGV movement on residential amenity and to enable any necessary upgrading, improvement or widening of the route. Such corridors through urban areas in Highland including Nairn extend to 20-30m either side of a distributor route ie. the existing A96. The potential for sawmill traffic - at the volume and frequency proposed - to cause nuisance to occupiers, and vibration to nearby buildings should not be underestimated. A forward planning exercise should recognise that and seek to mitigate, and in this case the development plan should seek to achieve a layout and design of any residential (or other) proposal that is sensitive to these considerations. Recommendation: In view of the integration of the Nairn South provisions NA8 and NA9 with one another and the A96(T) by-pass and their implications for the sawmill (NA12), the following recommendations arise from the objections lodged on behalf of John Gordon & Son in relation to NA8 and NA9 and the representation in relation to NA12; each is applicable as relevant to the appropriate PLDP allocation: (1) In accordance with the Highland-wide Local Development Plan any provision within the Inner Moray Firth Local Development Plan should recognise that the allocation of land at Nairn South is subject to consideration of transport and infrastructure; and that the unexplained increase in a first phase of development from 250 to 520 units should be corrected in that context and explained in relation to aspirations for an access to Nairn South from an A96(T) by-pass (see (2) below). (2) In view of the decision to refuse planning permission for (11/04355/FUL), any phasing plan for land at Nairn South should be subject to: (a) shared understanding with Transport Scotland that an access serving Nairn South is feasible in principle and clear specification given in the development plan of the grade-separated form of any A96 intersection at developer expense; and that; (b) that principle takes into account the consideration to be given by Transport Scotland to the access requirements of the sawmill (as invited by Transport Scotland). (3) In view of the decision to refuse planning permission (11/04355/FUL); the recommendations (1) and (2) above and the objectives of the Highland-wide Local Development Plan and the Strategic Masterplan in relation to “a buffer area” and residential amenity, any future allocation of land at Nairn South or planning application should be subject to a review of the requirements for structural open space (playing fields) in the context of major growth proposals for the town as a whole; the deliverability of any such requirements on land at Nairn South in view of the added separation (ie. beyond a 35m wide dedicated earth-bund) that could afford to the sawmill and future residents; and that that should be an action the planning authority will undertake and publish as supplementary guidance as necessary. (4) In view of the inadequate attention given thus far to Balblair Road, the development plan should state (NA8/NA9) that “a 20-30m set back of development from Balblair Road in the interests of residential amenity and any requirement for upgrading that route, will be sought as part of any proposals”. (5) The Inner Moray Firth Local Development Plan should follow the provisions in the Highland Wide Local Development Plan and the Nairn South Strategic Masterplan, and reference should be specifically made to avoiding any potential impact on the expansion of the sawmill. In that regard and in view also of the decision in relation to (11/04355/FUL) and the recommendation therein; NA8 “Requirements” should also state “avoidance of any adverse impact on the economic opportunities offered by the expansion of the sawmill, through the provision of all necessary mitigation measures to reduce noise levels at the mixed use allocation site; a buffer to separate any development at Nairn South from the sawmill to be provided by developers should be a minimum of 35m-wide”.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	04464	Name	Russell Greg Brindle	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Nairn South	Paragraph			
Reference	NA9 (Also apply to NA8)	Type	Change	Comment Late	No

Comment Changes

Changes suggested: The Local Plan - should state that no development of the sites should take place without new road provision in the surrounding area (I would have thought it sensible to concentrate new development in the A96 corridors to the east and west of the town thereby reducing the necessity for traffic to be dragged through the town centre and adjacent residential areas such as Waverley Road with the consequential pedestrian/vehicular conflict and detriment to amenity). The Local Plan should - specifiy a maximum density for the site which should be low to medium in keeping with and appropriate for the area. It should require the need for a specific landscape and environmental master plan for the sites. It should establish the principal of new development being set back from the road (a building line) which should be similar to the one already existing adjacent to the Firhall Development. It should require housing of a high quality architectural design, careful control of building materials and a respect for the local vernacular. It should establish exacting design standards for the site directly adjacent to the high quality Firhall Development to which it should both compliment and be sympathetic to.

Representation

REPRESENTATION.....The Sites are semi-rural, abutting open coutryside. The sites are fronting onto an important visual and environmental corridor which is a key pentrance into the town for residents and visitors from the Cawdor area. Tourism is important to the town and preserving and enhancing the enviornment should be a key objective of the local planning authority. The sites are adjacent and opposite to the Firhall Development, a design of outstanding architectural and landscape/environmental quality of national significance, in my opinion, of which the town should be rightfully proud. The sites are close to other low density developments including " institutions" sitting in their own mature landscaped grounds. I should also add my grave concern regarding the planning application for 232 houses and 87 flats which was recently dealt with. Indeed when I first saw the scheme in the local newspaper my reaction was one of shock and complete disbelief. The proposal, in my opinion, demonstrated a complete contempt and disregard for its setting. In fact it is difficult to imagine any situation where such a high density unimaginative mean proposal would be appropriate. It resembles some sort of military/barracks development devoid of vision and humanity. In conclusion, the fact that such a proposal was submitted emphasises the ncessesity for the Local Plan to be specific. I consider that the Local Plan should be amended to provide an appropriate context and specific guidance for the preparation (prior to submission) and later assessment of planning applications. If such guidance were in place then hopefully such appalling proposals would never see the light of day.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

There should be no development of this Area NA8 /NA9 in Nairn. This has already been rejected .

Representation

The road junction at the Railway bridge is already unsafe. The pavement is also too narrow . The general area has many large trees which support a Red Squirrel community
<http://www.snh.gov.uk/about-scotlands-nature/wildlife-and-you/red-squirrel/squirrels-and-the-law/>.... Nairn in itself has insufficient sevicees , poor school quality and council services are already stretched.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Removal of NA8 and NA9 areas from the proposed plan, Nairn South as it is called.

Representation

Nairn South is not needed, and should the planners pay any attention to the local people, busineses etc. not wanted. It can not be sustained by the local community, by transport links, or any part of the local infrastructure. To keep waving it around as though it were of merit is a flagrant disregard for the wishes of those who will have to live with it.

Allocated to

Customer Number	04513	Name	R & A Morrison	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA8		Type	Change	Comment Late
				No	

Comment Changes

Removal of site NA8 from the plan

Representation

As the Highland Council turned down an application for building on this site a few weeks ago due to insufficient infrastructure in this area we don't see how you could possibly go ahead with a plan for an even larger development in the same place. We attach a letter sent to you in both 2011 and 2012 stating the reasons as to why this plan should not go ahead and the reasons remain the same only the situation has got worse. Since this letter was written changes have been made to the area under the bridge and the health centre has been relocated and the hospital enlarged making the traffic situation on the Cawdor Road much busier. There have already been accidents in the area due to the amount of traffic stalled under the bridge, and should these plans go ahead things will only get worse. There are no jobs in the area, shops are closing down in Nairn and the economy is not improving. Surely it would make more sense to build homes closer to Inverness where maybe jobs could become available. We had read that a new town would be built at Tornagrain consisting of 10,000 homes so we don't see why you would give approval for 500 more to be built so close by in a small town which is already overcrowded. I am writing with reference to the proposed development by Scotia Homes and Robertson Homes for over 300 homes and flats on Cawdor Road, Nairn. As you can see from my address I live directly opposite the proposed development and am very much opposed to it. My husband and I moved to Firhall Village for peace and quiet, which we have at the moment, but if this development goes ahead it will ruin our life completely. Cawdor Road is a small country road and not fit for the amount of traffic that would be using the road while the building takes place or after the development is complete. Large builders lorries would find it difficult to access the site from the A96 due to the railway bridge. There is already a problem at the junction of Cawdor Road and the B9091 junction, which is extremely dangerous with the smaller amount of traffic that currently uses both roads. It is an accident waiting to happen, and we can't imagine what it will be like when there is a large amount of traffic trying to access the new development from the A96 or the B9091 junction. Maybe this project should be moved to an area closer to the A96, or at least postponed until the financial climate improves. A number of people walk into town daily from this area and at the present time this is a pleasant walk. If this project goes ahead there will be too much traffic and too many car fumes to make walking feasible. As well as affecting the people living here it will affect the wildlife which has made this area home. We have numerous birds including woodpeckers, doves, ducks, pheasant and owls, not to mention the endangered red squirrels. They will no doubt lose their peaceful habitat too when the builders move in and the traffic begins to rival that of a motorway. As reported recently travel conditions for a project of this size in Cawdor Road are unsatisfactory, and it would be unsuitable for housing to be built to the south of the town because of deficiencies in this area. Planning approval was granted on 29 April 1999 for Firhall Village Development providing an environment for people of middle age or older but once again older people's wishes would be completely disregarded if this development goes ahead. We feel strongly that we would be 'sold out' by the planning people who originally authorized that homes could be built in Firhall for older people to enjoy their later years. Obviously we are very much opposed to these plans as we will be adversely affected, but so will the people of Nairn and visitors who come to this area to enjoy the countryside. We have already lost too many green areas in Nairn, and this proposed development would lose many more. We have many runners and people on bikes using this road to raise money for charity, but that will become a thing of the past if planning permission is granted. While we may have a special interest in the outcome of the Scotia Homes proposal, so do they, and the person or company who is selling the land. Their interest is to make money and they obviously aren't bothered by the fact that they would be ruining many people's lives. Most of us would probably leave the area and move to a similar quiet community elsewhere as peace and quiet are our main requirements. We love our life in the Highlands and in particular in Nairn so we hope that this development does not go ahead and ruin a quality of life that would be difficult to find anyplace else.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	4.Development Allocations		Paragraph Site NA8 Nairn South		
Reference	Site NA8 Nairn South		Type	Support	Comment Late No

Comment Changes

Representation

The consortium supports the Council’s identification of Sites NA8 Nairn South and NA9 Nairn South (long term) in the IMF Proposed LDP and the associated requirements for new development at Site NA8. The IMF Proposed LDP identifies Site NA8 Nairn South for 520 homes, business and community use. The requirements for the site are that development is to be in accordance with the Nairn South Strategic Masterplan including phasing; transport assessment; identification of green network and appropriate footpath/cycleway connections; open space provision; education developer contributions; landscaping; consideration of potential heritage impacts; provision of a recreational access management plan; avoidance of any adverse effect on the integrity of the Inner Moray Firth SPA/Ramsar. The commitment by the consortium to delivering the housing land and other land use requirements has been demonstrated by the planning application submitted to The Highland Council (THC) under Ref: 11/04355/FUL. The boundary of the application site is attached in Appendix 2 and relates to residential development of 319 units and associated infrastructure and public open space at land at Cawdor Road, Nairn. The southern boundary of the application site is contiguous with the southern boundary of allocation NA8 Nairn South and the proposed 319 houses and other community uses and open space seek to achieve delivery of Site NA8 Nairn South in accordance with the Nairn South Strategic Masterplan referred to. It is relevant that Application Ref: 11/04355/FUL was recommended for approval by officers of THC, having regard to the development plan and other material considerations, including the requirements referred to above. The application was refused by Members on the grounds of highway capacity. The refusal is currently subject to a planning appeal (DPEA Ref: PPA-270-2097) and is considered to be unjustified and unreasonable. The reason for refusal did not relate to the principle of the proposal as the site is already allocated in the adopted HwLDP. The consortium would wish to make further representations on the Proposed LDP in the event that the decision is of relevance to this Plan. The continued commitment to site NA8 in the IMF Proposed LDP is supported given the above and the requirements of the HwLDP.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	1.Introduction		Paragraph Policy 1 Promoting and Protecting City and Town Ce		
Reference	NA8 and NA9		Type	Support	Comment Late No

Comment Changes

Representation

Nairn is identified as a Tier 2 settlement and its stated role under Policy 1 is supported. The allocations at NA8 and NA9 identified in the IMF Proposed LDP will positively support “the vitality and viability of any of the centres” including Nairn, by delivering planned residential and mixed use development, which will in turn support the objectives of Policy 1.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	04473	Name	John Flett	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph	4.32	
Reference	NA8		Type	Change	Comment Late
				No	

Comment Changes

The Section dealing with the development for housing of the land referenced NA8 should make it clear that development should only be allowed if and when the necessary road infrastructure is provided.

Representation

The Council, on 20 August 2013, rejected a planning application for 319 housing units on the same land. The rejection was founded on the inadequate road infrastructure surrounding the development. The revised version of the Inner Moray Firth Development Plan must reflect that refusal. Not to do so would leave the Council open to legal challenge and make a mockery of local democracy.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph	4.36	
Reference			Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

Section 4.35. It would be better if the developments on these sites were prioritised in the following order. 1. Lochloy, 2. Sandown, 3. Delnies and 4. Nairn south. I note that Lochloy is on going but in relation to the other 3 sites there should be a priority in that Sandown and Delnies have both suficient infrastructure in place to start immedatly and are the preferred sites in the town for development. There should be a preference against starting Nairn South until all three of the other sites are compleat. This is because the infrastructure is poor and in need of improvement prior to starting. The community does not want development on this site and lastly it is unfair on the town/community to have on going development on all three sides at the same time. (Noise, disruption, disturbance, etc).

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	04519	Name	J. Pullinger	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA8		Type	Change	Comment Late
				No	

Comment Changes

Removal of allocation NA8

Representation

Recently the Highland council voted against building 300 plus homes on part of this site due to the lack of infrastructure and the already overcrowded roads in Nairn. Traffic under the railway bridge at Nairn is constantly backed up already and if this plan should be approved there will be a permanent trafficjam in this area, in fact traffic will come to a complete standstill. Nairn is a small town, which is afready overcrowded. Shops are closing down in the town as people travel to Inverness for their shopping needs and homes are becoming more difficult to sell in the area. Surely it would make more sense to expand in Inverness closer to the A96. There is a proposal already in the works to build a new town at Tornagrain of over 1000 homes and this makes far more sense than building in a small country town which doesn't have the infrastructure to cope with over 521 homes. I don't understand how you can turn down a proposal to build 300 homes then immediately propose that over 500 homes should be built in the same area.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	04516	Name	R & J Marsh	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA8, NA9		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

(i) Together with the huge number of Nairn residents who demonstrated their views on September 18 last, we remain totally opposed to any housing development on site NA8 (Nairn South), or indeed, site NA9, until Nairn has a by-pass. In that regard we can only hope that the Highland Planning Committee's decision regarding site NA8 after their visit on September 18 - a commendable acknowledgement of local democracy - will hold fast and be respected by all who have an interest therein. This opposition to development at site NA8 is based largely on the already critical traffic situation at the Cawdor Road railway bridge, where serious accidents are narrowly avoided daily. Any increase in traffic entering Nairn by that route as a consequence of increased residential development south of Nairn prior to the easement which would come from a suitablyrouted by-pass would inevitably - and, in our view, irresponsibly - greatly increase the threat at the Cawdor Road bridge to both vehicle occupants and pedestrians. Members of the Planning Committee saw the bridge situation for themselves on September 18. Many of those who then demonstrated against South Nairn development prior to a by-pass experience the hazards every day. Nor will minor adjustments at this point provide any credible resolution to those hazards. Re-aligning kerbs, altering pavement widths, traffic lights? None of those would reduce traffic volumes, and, at times, traffic lights would only serve to increase congestion. So, we would urge those responsible for the Inner Moray Firth Developmt!nt Plan to unequivocally emphasise that there will be NO development at site NA8 prior to Nairn's acquisition of a by-pass. ,J II 2 (ii) Further grounds for that stance relate to Nairn's tourist and holiday centre potential, and the proposed development at Tomagrain. With regard to the former, surely the Development Plan should lay far greater emphasis on the benefits to be derived from further exploitation of Nairn's great assets: three excellent beaches ... two first-class golf courses and numerous others within easy reach ... a location adjacent a fine, modem airport ... close proximity to the Cairngorms ... straightforward travel to the West Coast, Skye, the Northern Highlands and Aberdeen, and the near availability of all that Inverness has to offer as a regional centre. These are surely both natural and man-made features which give Nairn's holiday resort potential advantages far beyond those of many better-known locations elsewhere in the UK. One would urge, therefore, that a document such as the Development Plan would have more relevance to and, potentially, more impact on Nairn if it involved more specific proposals for the expansion and development of the tourist centre potential. Expansion of the holiday/tourists business in Nairn by a precise effort to encourage appropriate investment would create jobs in Nairn. Those jobs would reduce the need for people based in Nairn to travel elsewhere in search of employment, with consequent benefits regarding traffic levels and 'Green' issues. Those jobs would also contribute to a revival of Nairn's town centre prosperity. While the need to reverse the town centre decline is acknowledged in the Report precise measures for achieving that urgent and much-desired progress are conspicuously absent. Thus the proposal that Nairn should have a massive residential expansion tends to vaguely imply that a solution to all Nairn's other needs would flow from progress with that aim. As the people of Nairn vigorously demonstrated when the Highland Council Planning Committee visited the town on September 18 last, however, it is a staunchlyheld local view that housing alone is not the answer and will merely serve to greatly exacerbate the problems (iii) Furthermore, a substantial deferment of development at site NA8 could support and assist matters at Tomagrain. Given the location concerned, the proposal for the Tomagrain new town is logical and highly-commendable, especially if it can be developed in conjunction with the expansion of employment opportunities adjacent to Inverness airport. Indeed within these two aspirations lies an opportunity for the Highlands to acquire a flagship development which would say much about the energy, vibrancy and further growth potential to be found in the Highlands of the future. The development of Tomagrain, with its essential services and facilities, should therefore be an unequivocally-expressed priority. Its development should not be impeded by projects elsewhere likely to compete in any way.

Allocated to	Nairn	NA8	Nairn South	
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Customer Number	04364	Name	Katharine Rist	Organisation	Woodland Trust	
Agent Name amd Organisation (if applicable)						
Section	4.Development Allocations		Paragraph			
Reference	NA9		Type	Change	Comment Late	No

Comment Changes

AW at NH880546 between building at Broadley and River Nairn and along river banks. Any development should protect these and provide for management, buffering and potential expansion of woodland.

Representation

The Woodland Trust Scotland considers that any woodland included in Scottish Natural Heritage’s Ancient Woodland Inventory (AWI) which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and is therefore high value for conservation and worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. Highland Council supplementary guidance notes that woodlands and trees offer multiple benefits in terms of addressing climate change, improving the water environment, providing valuable habitats, timber industry and creating recreational opportunities. Considerations include the cumulative impact of woodland removal, and fragmentation of habitat. Both Scottish Government policy and the Highland Wide LDP policy create a presumption in favour of protecting woodland. The Highland Wide LDP in policy 57 recognises ancient woodland as (depending on the category) of regional or national importance. Both the Woodland Trust Scotland and Scottish Planning Policy at para 148 consider ancient and semi natural woodland to be an important and irreplaceable national resource and should be protected and enhanced. The Woodland Trust Scotland would like to see a clear statement that the loss of ancient woodland cannot be mitigated, and therefore warrants protection from development. Development impacts on ancient woodland in a number of ways including chemically, disturbance by human activity, fragmentation, and colonisation of non-native plants. The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Allocated to	Nairn	NA9	Nairn South (long term)	
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Customer Number	01232	Name	Mr Charles Allenby	Organisation	
Agent Name amd Organisation (if applicable)		Mr Robert Evans		Muir Smith Evans	
Section	4.Development Allocations		Paragraph		
Reference	NA 9 Nairn South		Type	Change	Comment Late
				No	

Comment Changes

Site : NA9 Nairn South (long term) Area 9 (ha): 17.6 Uses: 410 homes, business and community Requirements: No development will be permitted prior to completion of NA8. Development will be subject to a comprehensive development framework or strategic masterplan prepared in conjunction with Highland Council and subsequently adopted as Supplementary Planning Guidance. This should address phasing and the potential links to the proposed A96(T) by-pass; open space provision; education developer contributions; footpath/cycleway connections and linkages to wider area; structural landscaping; consideration of potential heritage impacts; provision of a recreational access management plan; Flood Risk Assessment; avoidance of unacceptable adverse effect on the integrity of the inner Moray Firth SPA/Ramsar.

Representation

NA9 does not accord with the phasing set out by the Nairn South Strategic Masterplan nor set out the infrastructure requirements associated with development. It provides insufficient guidance or clarity and could lead to sporadic or isolated patterns of development that are not well linked physically or functionally to the existing urban structure of the town. The IMFLDP does not adequately define the phasing of development in line with allocations as required by Highland Wide Local Development Plan and the Nairn South Masterplan and does not respond to concerns expressed by the local community and Development Control decisions taken by Highland Council. Specifically in terms of NA 9 Phase 2 (a) and 2 (b) should be revisited so that local roads and access issues, including the new pedestrian and cycle bridge over the railway to the academy, should be provided within the first phase of development. In addition, the retail/commercial/community facilities should be provided as an earlier phase of development. Local retail facilities should be provided, as initially suggested by Highland Council in the A96 Corridor Study and HWLDP in the northern sector of the allocation. See figure ALLE 000 5 Nairn South needs to be developed at an appropriate density to ensure a successful transition between rural and urban. Design should be specific to Nairn and Designing Streets should form a basis for good practice in calming traffic and creating a strong sense of place and well-designed public spaces. It should not be a high density reproduction of other more central parts of the town centre. The site is on the edge of the settlement and requires a sensitive approach to design. Lower density development is in keeping with the location and character of the area and will engender a successful town expansion and encapture a feeling of place and which will protect and enhance the setting of the town and its existing landscape features. The need to take account of the existing townscape and landscape in the planning of Nairn South is important. In addition, any development framework should recognise that Cawdor Road is the main route to the visitor and tourist attractions and an important point of entry to the town from the south. Designing Streets sets out good practice in designing places that meet the needs of new communities and designing for all modes of transport to provide safe places with local identity. See figure ALLE 0003 New development should be consistent with PAN 44 - Fitting New Housing Development into the Landscape, which states in paragraph 9 that “Lack of integration with the landscape is particularly noticeable on the edges of our small and medium sized towns. Many new housing developments have been planned and carried out without evident regard to existing urban form and the local landscape, or to their wider visual impact particularly when seen from road and rail approaches. Insensitive development can undermine the special environmental quality of towns and their setting in the countryside which have drawn people to live and invest in them in the first place”. The development of Nairn South should also be consistent with PAN 72 - Housing in the Countryside, which provides the context to good design practice and seeing things in context and that development should respect landform and landscape. The planned release of large housing allocations should be guided by a better understanding of the characteristics of the landscape and its suitability for development. Careful attention should be paid to landscape fit, and the principles of good design should be applied consistently by authorities in their planning decisions. PAN 83 (Masterplanning) and PAN 68 (Design Statements) both also recognise context as a critical starting point. Development should be contained and should not be linear or sprawl or detached from the settlement edge. Good design is about providing shape and context and providing a good environment for all. Government guidance strongly supports this approach and provides that the landscape and topography should inform and contain the layout of any new devolvement. PAN 72 reinforces this approach stating “... landscapes have different capacities to accommodate development. It is therefore crucial that the proposed location and siting of new housing considers the impact on the landscape, in terms of both immediate and wider surroundings...” The guidance goes on to state that “The importance of layout within a site cannot be over stated”. We have adopted this approach through the process of submissions to HWLDP and the application for Planning Permission in Principle. However, this has been ignored or dismissed by Highland Council who has instead prepared the Nairn South Masterplan to align with the boundaries of the Scotia Consortium application leading to isolated development not well connected, indeed physically separate, from the surrounding area. This has not been supported by the local community,

Community Councils or indeed Highland Council Planning and Environment Committee who refused the planning application. Our approach has always been centred upon the need for a comprehensive masterplan for Nairn South. Following the publication of the Reporter’s findings and the adoption of the HWLDP; the Nairn South Masterplan and the recent refusal of the Scotia Consortium planning application we have reviewed our masterplan. We submit that this is endorsed by the Inner Moray Firth Local Development Plan as a further iteration of the Nairn South Masterplan to better reflect community views and to respond to local access and infrastructure issues. Our approach is preferred by the Community Councils as it delivers improvements to local infrastructure at the start of the development process and provides better linkages with the surrounding areas. The Inner Moray Firth Local Development Plan should therefore provide more specific guidance and design principles for the masterplan and phasing of Nairn South as follows: ■ A mixed but overall a low density of development that suits the edge of town and country setting of Nairn South; ■ A limit of numbers within successive phases of development; ■ Housing will be for a mix of family units including affordable provision for all sectors of the community provided throughout the development; ■ A mixed development including a range of business, commercial, retail and community facilities, not just housing; ■ A pedestrian and cycle link and bridge over the railway to the town centre as an early phase of development; ■ A development that respects the landform, landscape features and setting to provide a strong and contained edge to the settlement; ■ Local access and transport improvements to Balblair Road and Cawdor Road; ■ To provide for reasonable expansion of existing commercial uses such as the sawmill; and, ■ To provide a link between Cawdor Road and Balblair Road. Context for IMFLDP is provided by the HWLDP. It states that “to meet the identified gross housing land requirement for the Nairn area, land allocations have been brought forward to offer choice and flexibility in the land supply. Taken together the land now identified in the Nairn area has the capacity to meet the following housing requirements across all sites.” Table 3: Potential distribution of development to meet Housing Land Requirement in the Nairn Housing Market Area allocates 330units beweeet 2011 and 2021 and a further 600 units between 2021 and 2031. HWLDP states that a “limited release” of land in Nairn South would supplement the land supply in Nairn and that the pinch points associated with the existing railway bridge and the junctions on to the A96 can be sufficiently improved to enable this development. The allocation on NA8 in the IMFLDP is therefore contrary to the HWLDP in terms of phasing and housing numbers allocated. It does not provide enough specific reference or explanation of the requirements of the Nairn South Masterplan. It does not adequately or accurately reflect the more detailed phasing of the Nairn South Masterplan and it would set a dangerous precedent for unsympathetic development that was not well considered in the context of Nairn in terms of unit numbers, linkages, density or urban form. The allocation proposed is not an appropriate response to the Nairn South Masterplan and does not provide any phasing for development or numbers within successive phases. It falls short of a full consideration of the distinct phases as required by the Nairn South Masterplan. The IMFLDP as drafted is consistent with the approach adopted in the previous application made by the Scotia Consortium but that application has already been refused by Highland Council. See ALLE 0006 NA9 requires to provide for more logical phasing of development to ensure early delivery of improvements to local infrastructure. NA9 – Long Term has no explanation or context and allocates land sufficient for 410 housing units and retail facilities in the long term. The HWLDP process had previously identified a mixed use commercial area with local retail facilities at the northern edge of the area. The extract text from Policy 18 of the HWLDP (below) is more precise and relates to detailed issues that should enable the IMFLDP to be more specific in terms of guiding development rather than more general as it appears at present. Phase 1 of development should contain development within a strong landscape setting, provide for a bridge over the railway and expansion of the sawmill. This should be based on starting development at the edge of the urban area and working out rather than the alternative as suggested to develop early phases that are physically detached from the edge of the settlement. This is consistent with views previously expressed by Nairn West Community Council. Also, the southern extent of phase 1a) should be limited from that shown below in the Masterplan to respect and recognise the existing landscape features and to limit development unconnected with the town. We request that more detail is provided by IMFLDP to inform the successive phasing of development and specific infrastructure requirements. This should evolve from the Nairn South Masterplan to provide a better context for development of Phase 1 of Nairn South. Phase 2b) should be delivered in advance of 2a) not as shown in the Nairn South Masterplan, to enable early delivery of pedestrian and cycle bridge over railway. It is essential that initial phases of development should include provision of the new pedestrian/cycle bridge across the railway, improvements to Balblair Road and the sawmill access and the link road between Balblair Road and Cawdor Road as well as enhancement of the railway underbridge on Cawdor Road. Such measures should be included as a direct response to community concerns expressed and the phasing of the Nairn South Masterplan should therefore be reviewed to reflect this. The illustrative masterplan below demonstrates how this could fit within the wider context and how development could be shaped within the landscape. This is consistent with HWLDP but requires phasing to be amended to ensure the provision of key infrastructure as development proceeds. The phasing shown below is for Phases 1 (a & b) and 2 (a & b) with a strict limit of 250 within the initial phase of development (Phase 1a). The IMFLDP should include the phases and boundaries as suggested below. See ALLE 0007 The development framework presented above completes the requirement for a masterplan approach for the initial phase of the Nairn South area that is consistent with government advice and the Reporter’s recommendations and conclusions. This includes a mixed use development including community uses, open space, local neighbourhood retail, business units, limited to a total of 220 houses (including affordable) within the first phase of development within NA8, pedestrian and cycle bridge across the railway, local distributor link road between Balblair Road and Cawdor Road and 5.1ha sawmill expansion with appropriate noise mitigation including bund to ramp for bridge, landscaping, buildings and planting.

Allocated to	Nairn	NA9	Nairn South (long term)	
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Customer Number	01310	Name	Scotia Homes, Barratt East Scotland And Robe	Organisation	
Agent Name amd Organisation (if applicable)		Emelda Maclean		Emac Planning LLP	
Section	4.Development Allocations		Paragraph	Site NA9 Nairn South (long term)	
Reference	Site NA9 Nairn South (long term)		Type	Change	Comment Late No

Comment Changes

The consortium supports the allocation and requirements of the allocation, with the exception of the requirement that “no development prior to completion of NA8” should proceed at NA9. Representations below are relevant.

Representation

The consortium supports the allocation of site NA9 Nairn South (long term) in the IMF Proposed LDP, including the requirements of the allocation, with the exception of the requirement that “no development prior to completion of NA8” should proceed at NA9. The consortium supports the identification of Site NA9 Nairn South (long term) for retail, 410 homes, business and community. The additional following requirements are also supported, including that the developer is to prepare a masterplan / development brief which should address phasing; transport assessment identifying requirement for linkages to the proposed A96 (T) bypass; open space provision; education developer contributions; footpath/cycleway connections and linkages to wider area; landscaping; consideration of potential heritage impacts; provision of a recreational access management plan; Flood Risk Assessment; avoidance of any adverse effect on the integrity of the Inner Moray Firth SPA/Ramsar. The consortium objects to the stated requirement that no development should proceed on Site NA9 prior to completion of Site NA8. Whilst the Council has an aspiration that Site NA8 should be completed in its entirety the Planning Authority cannot control the completion date. The Local Authority also has a requirement to ensure the delivery of effective housing land, both within the period of the LDP and in the longer term. In the absence of any control over the completion of the entire allocation of NA8: Nairn South within the period of the LDP (2011-2021), further housing or other mixed use development at NA9 (2021-2031) should not be constrained in the long term, as housing will also be required in this period. The above restriction could prevent a further 410 houses coming forward in the long term in the event that NA8 is not completed within the period anticipated, that is 2011-2021 or shortly thereafter. The consortium requests that the above stated restriction is removed from the IMF Proposed LDP. The suggested and preferred alternative approach would be for the LDP to clarify instead that the delivery of site NA9: Nairn South (long term) is programmed for the period 2021-2031. It is considered that this approach would be consistent with Table 1 of the IMF Proposed LDP and also avoid the delivery of site NA9 being constrained by completion of site NA8 in its entirety. The completion of Site NA8 is not in the control of the Council or the consortium. Site NA9 is within the control of the consortium who intends to deliver development on site NA9 within the period 2021-2031. This restriction has the ability to impede the effective delivery of site NA9 in the period when this development is required. In summary, the consortium supports the objectives and vision for the IMF Proposed LDP, together with the proposed targets for growth, balanced against environmental considerations. The consortium supports the allocations at Nairn South including NA8 and NA9, but considers that the delivery of NA9 should not be constrained by the requirement for NA8 to be completed first, in its entirety. The submitted planning application (THC Ref: 11/04355/FUL) and current planning appeal (DPEA Ref: PPA-270-2097), illustrate the commitment of the consortium to delivering the housing land requirement and other identified land uses at Site NA8. The site already form part of the Council’s effective supply of housing land and therefore requires to be included in the IMF proposed LDP. The consortium remains committed to delivering the objectives for the long term site NA9 through the masterplanning process. The results of the Strategic Environmental Assessment (SEA) identify that both these sites are well located to accommodate the development proposed in the IMF Proposed LDP and should be supported. It is respectfully requested that the above representations are taken into consideration in support of the allocation of sites NA8 and NA9 in the LDP.

Allocated to	Nairn	NA9	Nairn South (long term)	
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Customer Number	00561	Name	Councillor Laurie Fraser	Organisation	The Highland Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NA9	Type	Change	Comment Late	No

Comment Changes

As per representation.

Representation

NA9. Nairn South. This proposal is long term and it will be many years before any building can take place here. the site is unlikely to be developed with the proposed Nairn by-pass having no direct access link. In this case I would request to have this site removed from the development plan totally. If this were done then it would also go some way to alay local fears that Nairn was being turned into a giant development site for housing.

Allocated to	Nairn	NA9	Nairn South (long term)	
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