

Highland Council Inner Moray Firth Local Development Plan

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

Customer Number	04361	Name	Hamish J Mackenzie	Organisation	Tain & Easter Ross Civic Trust
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Nigg General		Type	Change	Comment Late
				No	

Comment Changes

Suggest new planned village at Nigg. Close to shorebase.

Representation

We suggest that the possibility of a new settlement at Nigg, for workers at the Nigg Yard should be examined. This could be a new planned village, looking out over Cromarty.

Allocated to	Nigg	General	General	
--------------	------	---------	---------	--

Customer Number	04512	Name	W. McCloud	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NG1		Type	Change	Comment Late
				Yes	

Comment Changes

Review boundary of Nigg masterplan

Representation

Ref. dwellings Broomhill, Broomhill Cottage, St Kilda, Balnabruaich, Nigg. IV19 1 QU - The boundary drawn and published in the Nigg Master Plan is not clear when matched with areas on the ground. The Title to the land is held by the owners. The hamlet of 3 dwellings and private land at Balnabruaich between the protected woodland and B9175 has been reincluded as Industrial land. It had this designation removed around 10 years ago, allowing the easing of planning restrictions for the houses, some of which have been there for 200 years, and the new build of St Kilda. The present owners of Nigg Yard indicated that they had no need of this small corner, and indeed have fenced it off themselves along the boundary of St Kilda, earlier this year. Two of the owners of the private dwellings are 5th generation crofters of the original plots, and remained outwith the earlier development of Nigg by their firm refusal to sell their croft right. As this land is surplus to industrial requirements, present and future, could it please be returned to residential use to enable the owners to enjoy their Properties free of planning restrictions caused by inclusion within the Nigg Yard Boundary.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	04511	Name	Anne Thomson	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NG1		Type	Change	Comment Late

Comment Changes

Review boundary of Nigg masterplan

Representation

Ref. dwellings Broomhill, Broomhill Cottage, St Kilda, Balnabruaich, Nigg. IV19 1 QU - The boundary drawn and published in the Nigg Master Plan is not clear when matched with areas on the ground. The Title to the land is held by the owners. The hamlet of 3 dwellings and private land at Balnabruaich between the protected woodland and B9175 has been reincluded as Industrial land. It had this designation removed around 10 years ago, allowing the easing of planning restrictions for the houses, some of which have been there for 200 years, and the new build of St Kilda. The present owners of Nigg Yard indicated that they had no need of this small corner, and indeed have fenced it off themselves along the boundary of St Kilda, earlier this year. Two of the owners of the private dwellings are 5th generation crofters of the original plots, and remained outwith the earlier development of Nigg by their firm refusal to sell their croft right. As this land is surplus to industrial requirements, present and future, could it please be returned to residential use to enable the owners to enjoy their Properties free of planning restrictions caused by inclusion within the Nigg Yard Boundary.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	04510	Name	Gwyneth Lock	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	NG1		Type	Change	Comment Late

Comment Changes

Review boundary of Nigg masterplan

Representation

Ref. dwellings Broomhill, Broomhill Cottage, St Kilda, Balnabruaich, Nigg. IV19 1 QU - The boundary drawn and published in the Nigg Master Plan is not clear when matched with areas on the ground. The Title to the land is held by the owners. The hamlet of 3 dwellings and private land at Balnabruaich between the protected woodland and B9175 has been reincluded as Industrial land. It had this designation removed around 10 years ago, allowing the easing of planning restrictions for the houses, some of which have been there for 200 years, and the new build of St Kilda. The present owners of Nigg Yard indicated that they had no need of this small corner, and indeed have fenced it off themselves along the boundary of St Kilda, earlier this year. Two of the owners of the private dwellings are 5th generation crofters of the original plots, and remained outwith the earlier development of Nigg by their firm refusal to sell their croft right. As this land is surplus to industrial requirements, present and future, could it please be returned to residential use to enable the owners to enjoy their Properties free of planning restrictions caused by inclusion within the Nigg Yard Boundary.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	04364	Name	Katharine Rist	Organisation	Woodland Trust
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NG1		Type	Change	Comment Late
				No	

Comment Changes

Development avoids AW at NH769967. Appropriate buffering required.

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	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	00313	Name	Mrs Eveline Waring	Organisation	Nigg And Shandwick Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NG1		Type	Change	Comment Late
				No	

Comment Changes

Plan should mention natural and built heritage features of Nigg

Representation

Whilst Nigg has clearly been identified as an employment growth area it is to the detriment to it's other attributes by playing down that it is an area of great beauty, largely agricultural with a bird sanctuary and many historic sites including the Nigg Old Church and Celtic Stone. It is a tourist area with coaches coming in on a daily basis and a ferry to and from Cromarty. Little or no mention is made of these attributes surely they should be of equal consideration when looking at planning matters.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	00313	Name	Mrs Eveline Waring	Organisation	Nigg And Shandwick Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	NG1	Type	Change	Comment Late	No

Comment Changes

Reduction in size of allocation

Representation

We are pleased that the area designated industry (NG1) and incorrectly dsignated Nigg Yard has been considerably reduced from the totally inapprorpaite area it covered in the Main Issues Report. The land on the East of the B9175 is not part of Nigg Yard and it is the strong opinion of this community that it should be further reduced so it certainly does not include any of the private houses and thier land which is on the East side of the road (B9175). It should also be even more constricted so it does not include any of the land on the East side of the road returning it to open and agricutlural use. According to our understanding there are no industrial intentions for this land - can you please amend accordingly

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	01081	Name	St Francis Group	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph		
Reference	Proposal NG 1		Type	Support	Comment Late
				No	

Comment Changes

Representation

SUBMISSION ON BEHALF OF ST FRANCIS GROUP PROPOSED PLAN PROPOSAL REFERENCE: NG 1: NIGG YARD Colliers International is retained by St Francis Group (SFG) as property and planning advisor in relation to its land interest at Nigg. This comprises the proximal lands east of the Nigg Yard and referred in the Highland Wide Local Development Plan (HWLDP) adopted April 2012, as land comprising Policy 23 and also forming lands referred in the Supplementary Planning Guidance: Nigg Development Masterplan, adopted in 2009. SFG has made representations to all of the previous stages of the preparation of the Inner Moray Firth Local Development Plan (IMF LDP). In its last representation, dated June 2012, SFG expressed support for the identification of land in its control, comprising part of the HWLDP Policy 23 allocation including the identification of potential expansion land. This opportunity was further identified in the IMF LDP Main Issues Report as the Council’s preferred option (site reference I1) for future business and industrial use associated with the Nigg Yard itself, linked with future economic growth anticipated within the onshore and offshore renewable energy sector. To support SFG’s case for future industrial and business development in the areas identified in Policy 23, supporting studies were submitted with the Main Issues Report consultation. These demonstrated assessments to understand the topography of the land to accommodate development sites within the allocation; an assessment of landscape and visual character for the capacity of the site to accommodate the proposed development; and an assessment of the site’s natural habitat to accommodate development. SFG’s representation concluded that the site is effective in terms of accommodating future business and industrial development, stating “SFG is of the view that development platforms to accommodate the large scale developments [associated with the Nigg Development Masterplan uses] could best be fitted onto the lower slopes and mid-way up the site as capable of short to medium term development (within the LDP plan period of 5 years), followed on in future by development of further platform(s) in the northern parts of the site according to future demand and land supply.” (Colliers International Main Issues Report representation, page 14). Overall, SFG expressed support for the Council’s identification of the site to accommodate industry which has specialist large-scale space requirements, e.g. Renewable energy plant / components or mailers relating to decommissioning and subsea marine fabrication. Proposal NG1 In relation to the IMF LDP Proposed Plan the subject of this consultation, SFG wish to express support for the identification of land in its control, as part of the Proposal NG1. It is noted that the developer requirements set out in the Highland-wide Local Development Plan and the Nigg Masterplan will be carried forward into the Inner Moray Firth Local Development. This requirement is not disputed by SFG as it also made supportive contributions to the consultations leading to the adoption of the Nigg Masterplan. It is noted that Highland Council will require SFG to undertake species surveys. This is in principle acceptable, however the information previously submitted in support of the proposals (June 2012) provided a Phase 1 Habitat Survey (undertaken by Environ). It demonstrates an “unremarkable” ecology for the site, and that the key designation within the site, the Rosemarkie to Shandwick Coast SSSI is designated because of its special woodland, birds and plant life. However the proposals are not likely to pose a risk to designated sites. Environ did conclude the development opportunities for the site offer ecological enhancement potential, thereby enabling improvement and with it ecological benefits to the area. Therefore SFG would be willing to focus on the most appropriate species surveys which can add value to any future development proposals. Turning to the proposed boundary of Proposal NG1 identified in the Proposed Plan. SFG notes how this boundary has been reduced from the Preferred Option Site I1 identified in the Main Issues Report of the Inner Moray Firth Local Development Plan. It is however acknowledged this change is designed to reflect the boundary as shown in the HWLDP including the areas shown as potential expansion in the HWLDP. In so reducing the site boundary as shown for Proposal NG1, it is understood the other areas at Pitcalzean Farm omitted from the new boundary are not to be allocated in order to safeguard the natural, built and cultural heritage interest of the site. This being the case, SFG’s comments above in relation to the requirement for future species surveys support the request that only a focussed or appropriately scoped species survey need be undertaken in future in relation to the Proposal NG1 boundary. For the avoidance of doubt, it is also confirmed that all of the land in control of SFG within the Proposal NG1 boundary remains effective, as demonstrated in the Main Issues Report submission showing the indicative development platforms for large-scale space required for the specialist operations. A copy of this indicative plan is attached to this representation to confirm this to be the case. Vision for Ross-shire (including Nigg) SFG wish to object to the wording of the vision statement at Section 3.10 of the Plan. This should be modified to better reflect the range of specialist large-scale business and industrial operations that will make a new future at Nigg. These may be developments of an uncertain size and with locational characteristics, and which can only be accommodated on sites such as Proposal NG1. At Section 3.10 of the Proposed Plan, it reads “By 2031, the number of jobs, people and facilities in Ross-shire will have significantly increased and the area will be increasingly self sufficient. Nigg, Invergordon, Highland Deephaven will have

enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, and fabrication of both on-shore and off-shore renewables.” SFG wish a modification of the second sentence to read “Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, [specialist large scale marine related land uses with specific locational characteristics] and fabrication of both on-shore and off-shore renewables.” The proposed change would better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. Strategy for Ross-shire (including Nigg) SFG wish to object to Paragraph 3.11 with the wording of the first bullet describing the plan’s strategy. It is proposed this be modified, to better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector, as follows: The first bullet currently states: “3.11 Be the beating industrial heart of the Highland economy with: • Development of the fabrication industry at Nigg, Invergordon and Highland Deephaven as focal points for North Sea oil, subsea and renewables projects, rail and sea freight “ It is requested the following additional sentence is added “and [specialist large scale marine related land uses with specific locational characteristics]”. Section 4: Strategic Employment Sites – Large Employment Allocations in Ross-shire SFG objects to Paragraph 4.24 of this part of the Plan and is seeking a change. Presently Paragraph 4.24 states: “Nigg was also chosen to be an Enterprise Area due to its potential to create new employment opportunities, stimulate private investment and boost economic growth. Capacity also exists at these locations for the manufacture of sub-sea renewables structures.....” SFG wish an additional phrase leading after the above sentence, as follows: “and the accommodation of specialist large scale marine related land uses with specific locational characteristics” It is considered this proposed change will better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. It would be appreciated that you contact me in the event that you wish to discuss these proposed changes to the Proposed Plan. Please can you acknowledge safe receipt of this submission.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	01081	Name	St Francis Group	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	3.Strategy for Growth Areas		Paragraph	3.10	
Reference			Type	Change	Comment Late
				No	

Comment Changes

it reads “By 2031, the number of jobs, people and facilities in Ross-shire will have significantly increased and the area will be increasingly self sufficient. Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, and fabrication of both on-shore and off-shore renewables.” SFG wish a modification of the second sentence to read “Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, [specialist large scale marine related land uses with specific locational characteristics] and fabrication of both on-shore and off-shore renewables.” The proposed change would better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector.

Representation

PROPOSED PLAN PROPOSAL REFERENCE: NG 1: NIGG YARD Colliers International is retained by St Francis Group (SFG) as property and planning advisor in relation to its land interest at Nigg. This comprises the proximal lands east of the Nigg Yard and referred in the Highland Wide Local Development Plan (HWLDP) adopted April 2012, as land comprising Policy 23 and also forming lands referred in the Supplementary Planning Guidance: Nigg Development Masterplan, adopted in 2009. SFG has made representations to all of the previous stages of the preparation of the Inner Moray Firth Local Development Plan (IMF LDP). In its last representation, dated June 2012, SFG expressed support for the identification of land in its control, comprising part of the HWLDP Policy 23 allocation including the identification of potential expansion land. This opportunity was further identified in the IMF LDP Main Issues Report as the Council’s preferred option (site reference I1) for future business and industrial use associated with the Nigg Yard itself, linked with future economic growth anticipated within the onshore and offshore renewable energy sector. To support SFG’s case for future industrial and business development in the areas identified in Policy 23, supporting studies were submitted with the Main Issues Report consultation. These demonstrated assessments to understand the topography of the land to accommodate development sites within the allocation; an assessment of landscape and visual character for the capacity of the site to accommodate the proposed development; and an assessment of the site’s natural habitat to accommodate development. SFG’s representation concluded that the site is effective in terms of accommodating future business and industrial development, stating “SFG is of the view that development platforms to accommodate the large scale developments [associated with the Nigg Development Masterplan uses] could best be fitted onto the lower slopes and mid-way up the site as capable of short to medium term development (within the LDP plan period of 5 years), followed on in future by development of further platform(s) in the northern parts of the site according to future demand and land supply.” (Colliers International Main Issues Report representation, page 14). Overall, SFG expressed support for the Council’s identification of the site to accommodate industry which has specialist large-scale space requirements, e.g. Renewable energy plant / components or mailers relating to decommissioning and subsea marine fabrication. Proposal NG1 In relation to the IMF LDP Proposed Plan the subject of this consultation, SFG wish to express support for the identification of land in its control, as part of the Proposal NG1. It is noted that the developer requirements set out in the Highland-wide Local Development Plan and the Nigg Masterplan will be carried forward into the Inner Moray Firth Local Development. This requirement is not disputed by SFG as it also made supportive contributions to the consultations leading to the adoption of the Nigg Masterplan. It is noted that Highland Council will require SFG to undertake species surveys. This is in principle acceptable, however the information previously submitted in support of the proposals (June 2012) provided a Phase 1 Habitat Survey (undertaken by Environ). It demonstrates an “unremarkable” ecology for the site, and that the key designation within the site, the Rosemarkie to Shandwick Coast SSSI is designated because of its special woodland, birds and plant life. However the proposals are not likely to pose a risk to designated sites. Environ did conclude the development opportunities for the site offer ecological enhancement potential, thereby enabling improvement and with it ecological benefits to the area. Therefore SFG would be willing to focus on the most appropriate species surveys which can add value to any future development proposals. Turning to the proposed boundary of Proposal NG1 identified in the Proposed Plan. SFG notes how this boundary has been reduced from the Preferred Option Site I1 identified in the Main Issues Report of the Inner Moray Firth Local Development Plan. It is however acknowledged this change is designed to reflect the boundary as shown in the HWLDP including the areas shown as potential expansion in the HWLDP. In so reducing the site boundary as shown for Proposal NG1, it is understood the other areas at Pitcalzean Farm omitted from the new boundary are not to be allocated in order to safeguard the natural, built and cultural heritage interest of the site. This being the case, SFG’s comments above in relation to the requirement for future species surveys support the request that only a focussed or appropriately scoped species survey need be undertaken in future in relation to the

Proposal NG1 boundary. For the avoidance of doubt, it is also confirmed that all of the land in control of SFG within the Proposal NG1 boundary remains effective, as demonstrated in the Main Issues Report submission showing the indicative development platforms for large-scale space required for the specialist operations. A copy of this indicative plan is attached to this representation to confirm this to be the case. Vision for Ross-shire (including Nigg) SFG wish to object to the wording of the vision statement at Section 3.10 of the Plan. This should be modified to better reflect the range of specialist large-scale business and industrial operations that will make a new future at Nigg. These may be developments of an uncertain size and with locational characteristics, and which can only be accommodated on sites such as Proposal NG1. At Section 3.10 of the Proposed Plan, it reads “By 2031, the number of jobs, people and facilities in Ross-shire will have significantly increased and the area will be increasingly self sufficient. Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, and fabrication of both on-shore and off-shore renewables.” SFG wish a modification of the second sentence to read “Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, [specialist large scale marine related land uses with specific locational characteristics] and fabrication of both on-shore and off-shore renewables.” The proposed change would better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. Strategy for Ross-shire (including Nigg) SFG wish to object to Paragraph 3.11 with the wording of the first bullet describing the plan’s strategy. It is proposed this be modified, to better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector, as follows: The first bullet currently states: “3.11 Be the beating industrial heart of the Highland economy with: • Development of the fabrication industry at Nigg, Invergordon and Highland Deephaven as focal points for North Sea oil, subsea and renewables projects, rail and sea freight “ It is requested the following additional sentence is added “and [specialist large scale marine related land uses with specific locational characteristics]”. Section 4: Strategic Employment Sites – Large Employment Allocations in Ross-shire SFG objects to Paragraph 4.24 of this part of the Plan and is seeking a change. Presently Paragraph 4.24 states: “Nigg was also chosen to be an Enterprise Area due to its potential to create new employment opportunities, stimulate private investment and boost economic growth. Capacity also exists at these locations for the manufacture of sub-sea renewables structures.....” SFG wish an additional phrase leading after the above sentence, as follows: “and the accommodation of specialist large scale marine related land uses with specific locational characteristics” It is considered this proposed change will better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. It would be appreciated that you contact me in the event that you wish to discuss these proposed changes to the Proposed Plan. Please can you acknowledge safe receipt of this submission

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	01081	Name	St Francis Group	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	4.Development Allocations		Paragraph	4.24	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Presently Paragraph 4.24 states: “Nigg was also chosen to be an Enterprise Area due to its potential to create new employment opportunities, stimulate private investment and boost economic growth. Capacity also exists at these locations for the manufacture of sub-sea renewables structures.....” SFG wish an additional phrase leading after the above sentence, as follows: “and the accommodation of specialist large scale marine related land uses with specific locational characteristics” It is considered this proposed change will better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector.

Representation

SUBMISSION ON BEHALF OF ST FRANCIS GROUP PROPOSED PLAN PROPOSAL REFERENCE: NG 1: NIGG YARD Colliers International is retained by St Francis Group (SFG) as property and planning advisor in relation to its land interest at Nigg. This comprises the proximal lands east of the Nigg Yard and referred in the Highland Wide Local Development Plan (HWLDP) adopted April 2012, as land comprising Policy 23 and also forming lands referred in the Supplementary Planning Guidance: Nigg Development Masterplan, adopted in 2009. SFG has made representations to all of the previous stages of the preparation of the Inner Moray Firth Local Development Plan (IMF LDP). In its last representation, dated June 2012, SFG expressed support for the identification of land in its control, comprising part of the HWLDP Policy 23 allocation including the identification of potential expansion land. This opportunity was further identified in the IMF LDP Main Issues Report as the Council’s preferred option (site reference I1) for future business and industrial use associated with the Nigg Yard itself, linked with future economic growth anticipated within the onshore and offshore renewable energy sector. To support SFG’s case for future industrial and business development in the areas identified in Policy 23, supporting studies were submitted with the Main Issues Report consultation. These demonstrated assessments to understand the topography of the land to accommodate development sites within the allocation; an assessment of landscape and visual character for the capacity of the site to accommodate the proposed development; and an assessment of the site’s natural habitat to accommodate development. SFG’s representation concluded that the site is effective in terms of accommodating future business and industrial development, stating “SFG is of the view that development platforms to accommodate the large scale developments [associated with the Nigg Development Masterplan uses] could best be fitted onto the lower slopes and mid-way up the site as capable of short to medium term development (within the LDP plan period of 5 years), followed on in future by development of further platform(s) in the northern parts of the site according to future demand and land supply.” (Colliers International Main Issues Report representation, page 14). Overall, SFG expressed support for the Council’s identification of the site to accommodate industry which has specialist large-scale space requirements, e.g. Renewable energy plant / components or mailers relating to decommissioning and subsea marine fabrication. Proposal NG1 In relation to the IMF LDP Proposed Plan the subject of this consultation, SFG wish to express support for the identification of land in its control, as part of the Proposal NG1. It is noted that the developer requirements set out in the Highland-wide Local Development Plan and the Nigg Masterplan will be carried forward into the Inner Moray Firth Local Development. This requirement is not disputed by SFG as it also made supportive contributions to the consultations leading to the adoption of the Nigg Masterplan. It is noted that Highland Council will require SFG to undertake species surveys. This is in principle acceptable, however the information previously submitted in support of the proposals (June 2012) provided a Phase 1 Habitat Survey (undertaken by Environ). It demonstrates an “unremarkable” ecology for the site, and that the key designation within the site, the Rosemarkie to Shandwick Coast SSSI is designated because of its special woodland, birds and plant life. However the proposals are not likely to pose a risk to designated sites. Environ did conclude the development opportunities for the site offer ecological enhancement potential, thereby enabling improvement and with it ecological benefits to the area. Therefore SFG would be willing to focus on the most appropriate species surveys which can add value to any future development proposals. Turning to the proposed boundary of Proposal NG1 identified in the Proposed Plan. SFG notes how this boundary has been reduced from the Preferred Option Site I1 identified in the Main Issues Report of the Inner Moray Firth Local Development Plan. It is however acknowledged this change is designed to reflect the boundary as shown in the HWLDP including the areas shown as potential expansion in the HWLDP. In so reducing the site boundary as shown for Proposal NG1, it is understood the other areas at Pitcalzean Farm omitted from the new boundary are not to be allocated in order to safeguard the natural, built and cultural heritage interest of the site. This being the case, SFG’s comments above in relation to the requirement for future species surveys support the request that only a focussed or appropriately scoped species survey need be undertaken in future in relation to the Proposal NG1 boundary. For the avoidance of doubt, it is also confirmed that all of the land in control of SFG within the Proposal NG1 boundary remains effective, as demonstrated in the Main Issues Report submission showing the indicative development platforms for large-scale space required for the specialist operations. A copy of

this indicative plan is attached to this representation to confirm this to be the case. Vision for Ross-shire (including Nigg) SFG wish to object to the wording of the vision statement at Section 3.10 of the Plan. This should be modified to better reflect the range of specialist large-scale business and industrial operations that will make a new future at Nigg. These may be developments of an uncertain size and with locational characteristics, and which can only be accommodated on sites such as Proposal NG1. At Section 3.10 of the Proposed Plan, it reads “By 2031, the number of jobs, people and facilities in Ross-shire will have significantly increased and the area will be increasingly self sufficient. Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, and fabrication of both on-shore and off-shore renewables.” SFG wish a modification of the second sentence to read “Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, [specialist large scale marine related land uses with specific locational characteristics] and fabrication of both on-shore and off-shore renewables.” The proposed change would better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. Strategy for Ross-shire (including Nigg) SFG wish to object to Paragraph 3.11 with the wording of the first bullet describing the plan’s strategy. It is proposed this be modified, to better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector, as follows: The first bullet currently states: “3.11 Be the beating industrial heart of the Highland economy with: • Development of the fabrication industry at Nigg, Invergordon and Highland Deephaven as focal points for North Sea oil, subsea and renewables projects, rail and sea freight “ It is requested the following additional sentence is added “and [specialist large scale marine related land uses with specific locational characteristics]”. Section 4: Strategic Employment Sites – Large Employment Allocations in Ross-shire SFG objects to Paragraph 4.24 of this part of the Plan and is seeking a change. Presently Paragraph 4.24 states: “Nigg was also chosen to be an Enterprise Area due to its potential to create new employment opportunities, stimulate private investment and boost economic growth. Capacity also exists at these locations for the manufacture of sub-sea renewables structures.....” SFG wish an additional phrase leading after the above sentence, as follows: “and the accommodation of specialist large scale marine related land uses with specific locational characteristics” It is considered this proposed change will better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. It would be appreciated that you contact me in the event that you wish to discuss these proposed changes to the Proposed Plan. Please can you acknowledge safe receipt of this submission.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--

Customer Number	01081	Name	St Francis Group	Organisation	
Agent Name amd Organisation (if applicable)		Mr Neil Gray		Colliers Internatioinal	
Section	3.Strategy for Growth Areas		Paragraph	3.11	
Reference			Type	Change	Comment Late
				No	

Comment Changes

Change the wording of the first bullet describing the plan’s strategy. It is proposed this be modified, to better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector, as follows: The first bullet currently states: “3.11 Be the beating industrial heart of the Highland economy with: • Development of the fabrication industry at Nigg, Invergordon and Highland Deephaven as focal points for North Sea oil, subsea and renewables projects, rail and sea freight “ It is requested the following additional sentence is added “and [specialist large scale marine related land uses with specific locational characteristics]”.

Representation

SUBMISSION ON BEHALF OF ST FRANCIS GROUP PROPOSED PLAN PROPOSAL REFERENCE: NG 1: NIGG YARD Colliers International is retained by St Francis Group (SFG) as property and planning advisor in relation to its land interest at Nigg. This comprises the proximal lands east of the Nigg Yard and referred in the Highland Wide Local Development Plan (HWLDP) adopted April 2012, as land comprising Policy 23 and also forming lands referred in the Supplementary Planning Guidance: Nigg Development Masterplan, adopted in 2009. SFG has made representations to all of the previous stages of the preparation of the Inner Moray Firth Local Development Plan (IMF LDP). In its last representation, dated June 2012, SFG expressed support for the identification of land in its control, comprising part of the HWLDP Policy 23 allocation including the identification of potential expansion land. This opportunity was further identified in the IMF LDP Main Issues Report as the Council’s preferred option (site reference I1) for future business and industrial use associated with the Nigg Yard itself, linked with future economic growth anticipated within the onshore and offshore renewable energy sector. To support SFG’s case for future industrial and business development in the areas identified in Policy 23, supporting studies were submitted with the Main Issues Report consultation. These demonstrated assessments to understand the topography of the land to accommodate development sites within the allocation; an assessment of landscape and visual character for the capacity of the site to accommodate the proposed development; and an assessment of the site’s natural habitat to accommodate development. SFG’s representation concluded that the site is effective in terms of accommodating future business and industrial development, stating “SFG is of the view that development platforms to accommodate the large scale developments [associated with the Nigg Development Masterplan uses] could best be fitted onto the lower slopes and mid-way up the site as capable of short to medium term development (within the LDP plan period of 5 years), followed on in future by development of further platform(s) in the northern parts of the site according to future demand and land supply.” (Colliers International Main Issues Report representation, page 14). Overall, SFG expressed support for the Council’s identification of the site to accommodate industry which has specialist large-scale space requirements, e.g. Renewable energy plant / components or mailers relating to decommissioning and subsea marine fabrication. Proposal NG1 In relation to the IMF LDP Proposed Plan the subject of this consultation, SFG wish to express support for the identification of land in its control, as part of the Proposal NG1. It is noted that the developer requirements set out in the Highland-wide Local Development Plan and the Nigg Masterplan will be carried forward into the Inner Moray Firth Local Development. This requirement is not disputed by SFG as it also made supportive contributions to the consultations leading to the adoption of the Nigg Masterplan. It is noted that Highland Council will require SFG to undertake species surveys. This is in principle acceptable, however the information previously submitted in support of the proposals (June 2012) provided a Phase 1 Habitat Survey (undertaken by Environ). It demonstrates an “unremarkable” ecology for the site, and that the key designation within the site, the Rosemarkie to Shandwick Coast SSSI is designated because of its special woodland, birds and plant life. However the proposals are not likely to pose a risk to designated sites. Environ did conclude the development opportunities for the site offer ecological enhancement potential, thereby enabling improvement and with it ecological benefits to the area. Therefore SFG would be willing to focus on the most appropriate species surveys which can add value to any future development proposals. Turning to the proposed boundary of Proposal NG1 identified in the Proposed Plan. SFG notes how this boundary has been reduced from the Preferred Option Site I1 identified in the Main Issues Report of the Inner Moray Firth Local Development Plan. It is however acknowledged this change is designed to reflect the boundary as shown in the HWLDP including the areas shown as potential expansion in the HWLDP. In so reducing the site boundary as shown for Proposal NG1, it is understood the other areas at Pitcalzean Farm omitted from the new boundary are not to be allocated in order to safeguard the natural, built and cultural heritage interest of the site. This being the case, SFG’s comments above in relation to the requirement for future species surveys support the request that only a focussed or appropriately scoped species survey need be undertaken in future in relation to the Proposal NG1 boundary. For the avoidance of doubt, it is also confirmed that all of the land in control of SFG within the Proposal NG1 boundary remains effective, as demonstrated in the Main Issues Report submission showing the indicative development platforms for large-scale space required for the specialist operations. A copy of

this indicative plan is attached to this representation to confirm this to be the case. Vision for Ross-shire (including Nigg) SFG wish to object to the wording of the vision statement at Section 3.10 of the Plan. This should be modified to better reflect the range of specialist large-scale business and industrial operations that will make a new future at Nigg. These may be developments of an uncertain size and with locational characteristics, and which can only be accommodated on sites such as Proposal NG1. At Section 3.10 of the Proposed Plan, it reads “By 2031, the number of jobs, people and facilities in Ross-shire will have significantly increased and the area will be increasingly self sufficient. Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, and fabrication of both on-shore and off-shore renewables.” SFG wish a modification of the second sentence to read “Nigg, Invergordon, Highland Deephaven will have enhanced their reputation as a focal point for North Sea Oil, cruise ship berthing, rail and sea freight, [specialist large scale marine related land uses with specific locational characteristics] and fabrication of both on-shore and off-shore renewables.” The proposed change would better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. Strategy for Ross-shire (including Nigg) SFG wish to object to Paragraph 3.11 with the wording of the first bullet describing the plan’s strategy. It is proposed this be modified, to better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector, as follows: The first bullet currently states: “3.11 Be the beating industrial heart of the Highland economy with: • Development of the fabrication industry at Nigg, Invergordon and Highland Deephaven as focal points for North Sea oil, subsea and renewables projects, rail and sea freight “ It is requested the following additional sentence is added “and [specialist large scale marine related land uses with specific locational characteristics]”. Section 4: Strategic Employment Sites – Large Employment Allocations in Ross-shire SFG objects to Paragraph 4.24 of this part of the Plan and is seeking a change. Presently Paragraph 4.24 states: “Nigg was also chosen to be an Enterprise Area due to its potential to create new employment opportunities, stimulate private investment and boost economic growth. Capacity also exists at these locations for the manufacture of sub-sea renewables structures.....” SFG wish an additional phrase leading after the above sentence, as follows: “and the accommodation of specialist large scale marine related land uses with specific locational characteristics” It is considered this proposed change will better reflect a wider scope of opportunities of the site at Nigg suitable for inward investors in the specialist large scale marine related sector. It would be appreciated that you contact me in the event that you wish to discuss these proposed changes to the Proposed Plan. Please can you acknowledge safe receipt of this submission.

Allocated to	Nigg	NG1	Nigg Yard	
--------------	------	-----	-----------	--