

# Highland Council Inner Moray Firth Local Development Plan

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

Customer Number	04421	Name	Angus Macleod	Organisation	
Agent Name and Organisation (if applicable)		Roy Stirrat FRTPI		Stirrat Planning Consultancy	
Section	4.Development Allocations		Paragraph	4.170 – 4.174	
Reference	Strathpeffer, Housing		Type	Change	Comment Late
			No		

### Comment Changes

The proposal is to change the proposed IMFLDP by adding a 0.8 ha windfall housing and woodland site – see Site Plan Existing and Proposed. Four detached houses, served by a private access and a new woodland creating a strong landscape framework are proposed. The houses would be in character with those neighbouring, and support the policy aim of modest housing expansion. The site is just outwith the proposed settlement boundary, and is redundant farm land without beneficial use over many years. As a gap site between Coulwood and Elsick Farm, development here together with a large woodland next to Elsick Farm will create a housing and landscape asset. Site development cannot be construed as ribbon development or out-of-character. Four houses in large gardens would be contained by the new woodland, the overall wooded character in this part of the town would be enhanced, a public footpath connection would be created through the new wood to Blackmuir Wood, and a strong southern landscape town boundary would be created. A standard-compliant private access to the A834 would serve the four houses.

### Representation

1.Representation relates to the site refused planning permission in principle on 19th October 2010 for the development of one house. It is submitted that the opportunity should now be now taken to reconsider the beneficial use that this site could make to increasing Strathpeffer’s housing supply and strengthening its southern boundary by establishing a large woodland.

2.Planning Application 10/03364/PIP, Plot 1 Land to South of Coulwood, Strathpeffer proposed the erection of a house to the east of the A834 road between Coulwood to the north and Coulwood Cottage to the south. Plot 1 of 1.1ha extent was proposed for one detached 5 bed house served by a new non-adoptable midway vehicular access from the A834. The proposed access road was shown continuing south beyond Elsick Farm into the larger Plot 2 extending south past Laurel Cottage to just beyond Hawthorn Cottage. 3.The application was refused for the following reasons : 1)The proposal is contrary to the provisions of Policy H3 of The Highland Structure Plan and Policy GSP10 of the Ross and Cromarty East Local Plan, which presumes against the erection of new housing within the Hinterland Around Towns. No justification for departure from this policy (which complies with Development Plan Guidelines) has been put forward. 2)The proposal is contrary to Strathpeffer Policy 17 of the Ross and Cromarty East Local Plan which seeks to maintain the open character of the countryside around the fringes of Strathpeffer, notably towards Loch Kinellan, Coul and Jamestown. The erection of a house within the site, between Coulwood and Elsick Farm, and its associated access and garden grounds, would significantly erode this currently open character through the introduction of additional Buildings/hardstanding, the domestic appearance of garden grounds as opposed to the fields associated with open countryside, and would lead to ‘ribbon’ development through the visual joining of Coulwood and Elsick Farm. 3)The boundary of the settlement of Strathpeffer is well defined by the hedge around the garden ground of Coulwood, which denotes the transition from built form into the open countryside of the neighbouring fields. The proposal would lead to a visual encroachment into the field between Couwood and Elsick Farm, which would visually extend the built form of Strathpeffer, contrary to the provisions of the Development Plan Policy Guidelines. 4)The proposal is contrary to Policy BP3 of the Ross and Cromarty East Local Plan, which only allows development if there is no significant adverse effects on heritage, amenity, public health and safety interests. This proposal would seriously damage the visual amenity of the area, through enabling the encroachment of an additional building into the open countryside, and a visual linking of Coulwood and Elsick farm, and contribute to ‘ribbon development’ in this area of currently open countryside. 4.Revised proposals as shown on the Proposed Development site plan are submitted for reconsideration: i.Development only of Site 1, slightly increased in size from the planning application site, to allow establishment of a large woodland extending south of and containing Elsick. The former Site 2 is excluded from consideration. Four houses are proposed, each with a large garden and therefore reflecting the development scale and style of neighbouring houses. ii.Planting of a major woodland block of native trees, of extent 0.57ha, subject to forestry grant and maintenance requirements, on the southern part of the site and extending behind Elsick Farm. It achieves the following benefits : -contains development of the site to the south -provides a substantial new landscaped edge to

Strathpeffer -provides a strengthened transition between built form and countryside -provides a stronger landscape town boundary than the garden hedge at Coulwood -provides a landscape context for the presently isolated Elsie Farm -precludes further housing development south of Elsie Farm -stops any visual impression of ribbon development

iii.The proposed site has the visual appearance of unused land; indeed the land has not been used agriculturally for many years or attracted interest for other uses. Eastern views across the field are limited by the dominant backdrop scale of Blackmuir Wood. The site thus has strong landscape containment to the east but is part of a long open corridor of land to the south beyond Elsie Farm and towards Jamestown. The proposed large woodland will provide a strong complementary terminal landscape feature to both the proposed site and the town. As tree stock establishes and becomes the ever more apparent the woodland will increasingly be seen to contain Strathpeffer’s urban form.

iv.Access taken at the site corner by the 30mph signs, and therefore almost within the village boundary; with sightline distances available for both 30mph and 40mph speed requirements. The proposed access thus offers safe access and exit to the A834.

v.It is submitted that development of four detached houses with large gardens will not seriously damage the visual amenity of the local area, or that of neighbouring Coulwood; nor are there any other environmental or nature impacts.

5.The eastern site edge is bounded by the mature mixed woodland of Blackmuir Wood (Forestry Commission), with a public footpath along its edge used by the community. A footpath on the southern boundary of the proposed woodland would connect and diversify the community’s local path network.

6.Technically compliant site access to the A834 is available based on Council design guidance. Along this section of the A834, from the 30mph sign at the Strathpeffer boundary to Elsie Farm, there is a maintained 2m wide grassed verge, wider in part on the side opposite, and a number of access and road traffic management features. This stretch of road thus has a compromised visual quality, clearly making the road traveller aware of the transition from the countryside to the town:

Side Opposite Site

- new large bellmouth access and integral service bay to farmland
- closeby, on a widened verge, a large stone-built special “Welcome to Strathpeffer” sign and extended cleared grass verge sightlines
- 30mph speed restriction advance warning sign (100m)
- 30mph Please Drive Carefully sign at town entrance

Site Side

- Access No 1 to Elsie Farm
- Access No 2 to Elsie farm
- 11KV electricity pole near 30mph sign
- 30mph Please Drive Carefully sign

7.Road design guidance requires a new access to have a distance of 30m from an existing property (Coulwood). Positioning the proposed access at the nearest site corner by the 30mph sign achieves this distance.

8.Between Elsie Farm and the village boundary the road speed is 40mph, with the 30mph advance warning speed reduction sign opposite Elsie Farm Access No 1. Visibility ‘Y’ sightlines for a site access along this stretch requires distances of 120m, which are available and more; at 30mph the distance reduces to 90m. Sightlines are taken at the required ‘X’ distance back of 2.4m for the combined private access and service bay.

9.It is thus considered that development of the site represents :

- i.a site able to be developed and serviced without detriment to the Strathpeffer’s setting or the amenity of neighbours
- ii.a proposal offering strong landscape containment to the town on its southern edge
- iii.a windfall site offering four additional houses to the village’s stock
- iv.a layout and density comparable to neighbouring houses served by one private access compliant with location and design standards

10.It is submitted that proposal is significantly different from the planning application refused on 19th October 2010. It offers the opportunity to utilise redundant land which has no reasonable prospect of gainful other use; and creates a windfall development site offering four houses and the creation of a sizeable new woodland, all to the benefit of the local community.

11.The Inner Firth Proposed Local Development Plan for Strathpeffer should therefore be amended by designating the site as a Housing Site: Site: SP2 South of Coulwood Area:1.1haUses:Housing, 4 units Requirements: Access. Woodland establishment and management proposals. Landscape master plan.

Allocated to	Strathpeffer	General	General	
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Customer Number	00607	Name	The Castle Leod Maintenance Fund Trustees	Organisation	Bowlts Chartered Surveyors
Agent Name amd Organisation (if applicable)		Mr Ken Bowlts		Bowlts Chartered Surveyors	
Section	4.Development Allocations		Paragraph		
Reference	H1		Type	Change	Comment Late
				No	

Comment Changes

THIS REPRESENTATION SUPERCEDES OUR EARLIER REPRESENTATION This objection seeks the re-inclusion of The Nutwood field, Strathpeffer for housing, as per the site’s current allocated status for residential development in the adopted Ross and Cromarty Local Plan 2007 and the H1 allocation shown as a preferred site in the IMFLDP Main Issues Report (spring 2012). The site extends to approximately 3 hectares and has an indicative housing capacity of 15 units in the current Local Plan.

Representation

THIS REPRESENTATION SUPERCEDES OUR EARLIER REPRESENTATION This representation to maintain the current housing allocation in the adopted Ross and Cromarty Local Plan 2007 for the Nutwood is presented on the basis that nothing has changed in the intervening period and that issues such as impact on trees and achieving satisfactory access, can be addressed, in detail, as part of a future planning application. With reference to the Committee Report to the PED dated 18th September 2013, we address the specific points raised for The Nutwood site (H1 – preferred in MIR) as follows:- SNH raised concerns regarding part of the access being formed through stands of ancient woodland. • A detailed survey of the woodland and a Tree Impact Assessment would be carried out as part of the design work to ensure that the impact of the access would be minimised as much as possible; • Based on the indicative route of the access through the woodland, it is estimated that less than 10 mature trees would be removed. Given the scale of the proposed development and the scope for compensatory planting, this was not considered to be a significant detrimental factor. It is also to be noted that the site owner is willing to explore an alternative access via the existing Nutwood drive, in order to avoid the ancient woodland. Furthermore, it is proposed that in consultation with the Tree Officers, an appropriate junction onto the public road can be identified at either the existing Nutwood junction or at any other suitable point along the public road that sufficiently minimises the impact to the broadleaf avenue. “Given the scale of the development now proposed, the Forestry Officer considered that it is unlikely that the Council could support a road in the location proposed”. • It is noted that at no point has there been a request by the Forestry Officers to prepare a Tree Impact Assessment for further comment. It is reiterated that the indicative route through the woodland would result in less than 10 mature trees being removed, which may not have been appreciated at the outset; • The scale of development does not in itself create a reason for the site not to be supported. The indicative layout of the 3 hectare site had been presented in such a way as to promote effective use of land and green space; • For the avoidance of doubt, the indicative capacity was not specifically based on concerns raised by the Strathpeffer Community Council, but by informed site design work prior to these views being put forward; • Any visual impact will be mitigated against by compensatory planting and sensitive positioning of the access. • The scale and massing at Nutwood would be informed by the Conservation Area Management Plan to be prepared by the Council. “The Forestry Officer also had significant concerns over the impact that this scale of development will have on the mature trees surrounding the site”. • The significance of this specific concern is queried, given that the proposed housing layout does not directly impact on the mature trees surrounding the site. The indicative housing layout did provide a green buffer zone between the building footprint locations and the surrounding mature trees. As part of the ongoing house layout designing process of the site, it is proposed that the principle is established for a significant green buffer zone to safeguard surrounding mature trees. The Forestry Officer also had significant concerns over “the lack of open space within the site” • The significance of this specific concern is queried, given the points made above. It is also noted that the indicative housing layout included a central green space for amenity and recreational purposes, together with indicative compensatory planting throughout and around the perimeter of the site; • The Main Issues Report identifies the fact that the site is enclosed by mature woodland, which limits landscape impact, as a significant pro; • It is noted that the indicative housing layout suggested a housing density of approximately 0.061 hectares (0.15 acres) per unit, which is comparable to the SP1 Kinellan site within the Proposed Plan, which has an indicative housing density of 0.066 hectares (0.16 acres) per unit. For the avoidance of doubt, the final housing density for The Nutwood would be determined by the principles of sustainable use of land and necessary flexibility to provide appropriate affordable or smaller housing to meet local needs, whilst providing ample green space. It is proposed that as part of the site designing process, the principle is set for a significant green buffer to be established between the edge of the development and the Outstanding Conservation Area to the south. This will address concerns raised by the Strathpeffer Community Council and the comments made by the Forestry Officer of perceived lack of open space. The Committee Report suggests an “absence of any evidence explaining public benefits of the scheme”. • The development would create an opportunity to prepare a Tree Management Plan for the area that would safeguard and enhance the amenity value of the vicinity. • By applying modern designing principles, any increase in the unit number (above the current allocation of 15) will allow for a greater contribution to be made for much needed affordable homes in the area. • The development would create an opportunity to enhance linkage and public access to the Eaglestone

Schedule Monument; • The development would create opportunities for improved public access to, and within, the ancient woodland and to the golf course amenity land to the north; • As a viable development site, The Nutwood will improve the ability of Strathpeffer to deliver its housing requirements and help reduce the dependency on a single housing site (SP1), which is subject to its own constraints. Concerns were raised about the “accessibility of the site by a choice of transport options”. • It is noted that the development would benefit from an active travel connection via the path to the Eaglestone Schedule Monument and that opportunities will be created to enhance this further for pedestrian and cycling use; • It is noted that the existing link between The Nutwood and the village centre is less than a five minute walk. It is noted in the Committee Report that the site is “not required to meet the housing land requirements in the part of the Wester Ross housing market area that lies within the Plan area”. • As a viable development site, The Nutwood would offer variety and would help mitigate against the risks and dependency on a single housing site (SP1), as currently presented in the Proposed Plan, in delivering the housing requirements for the village of Strathpeffer and the wider area.

Allocated to	Strathpeffer	General	General	
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Customer Number	00607	Name	The Castle Leod Maintenance Fund Trustees	Organisation	Bowlts Chartered Surveyors
Agent Name and Organisation (if applicable)		Mr Ken Bowlts		Bowlts Chartered Surveyors	
Section	4.Development Allocations		Paragraph		
Reference	H1		Type	Change	Comment Late
				No	

Comment Changes

This objection seeks the re-inclusion of The Nutwood field, Strathpeffer for housing, as per the site’s current allocated status for residential development in the Ross and Cromarty Local Plan 2007 and the H1 allocation shown as a preferred site in the IMFLDP Main Issues Report (spring 2012). The site extends to approximately 3 hectares and has an indicative housing capacity of 15 units in the current Local Plan.

Representation

This representation to maintain the current housing allocation in the Ross and Cromarty Local Plan 2007 for the Nutwood is presented on the basis that nothing has changed in the intervening period and that issues such as impact on trees and achieving satisfactory access, can be addressed, in detail, as part of a future planning application. With reference to the Committee Report to the PED dated 18th September 2013, we address the specific points raised for The Nutwood site (H1 – preferred in MIR) as follows:- SNH raised concerns regarding part of the access being formed through stands of ancient woodland. • A detailed survey of the woodland and a Tree Impact Assessment would be carried out as part of the design work to ensure that the impact of the access would be minimised as much as possible; • Based on the indicative route of the access through the woodland, it is estimated that less than 10 mature trees would be removed. Given the scale of the proposed development and the scope for compensatory planting, this was not considered to be a significant detrimental factor. It is also to be noted that the site owner is willing to explore an alternative access via the existing Nutwood drive, in order to avoid the ancient woodland. Furthermore, it is proposed that in consultation with the Tree Officers, an appropriate junction onto the public road can be identified at either the existing Nutwood junction or at any other suitable point along the public road that sufficiently minimises the impact to the broadleaf avenue. “Given the scale of the development now proposed, the Forestry Officer considered that it is unlikely that the Council could support a road in the location proposed”. • It is noted that at no point has there been a request by the Forestry Officers to prepare a Tree Impact Assessment for further comment. It is reiterated that the indicative route through the woodland would result in less than 10 mature trees being removed, which may not have been appreciated at the outset; • The scale of development does not in itself create a reason for the site not to be supported. The indicative layout of the 3 hectare site had been presented in such a way as to promote effective use of land and green space; • For the avoidance of doubt, the indicative capacity was not specifically based on concerns raised by the Strathpeffer Community Council, but by informed site design work prior to these views being put forward; • Any visual impact will be mitigated against by compensatory planting and sensitive positioning of the access. • The scale and massing at Nutwood would be informed by the Conservation Area Management Plan to be prepared by the Council. “The Forestry Officer also had significant concerns over the impact that this scale of development will have on the mature trees surrounding the site”. • The significance of this specific concern is queried, given that the proposed housing layout does not directly impact on the mature trees surrounding the site. The indicative housing layout did provide a green buffer zone between the building footprint locations and the surrounding mature trees. As part of the ongoing house layout designing process of the site, it is proposed that the principle is established for a significant green buffer zone to safeguard surrounding mature trees. The Forestry Officer also had significant concerns over “the lack of open space within the site” • The significance of this specific concern is queried, given the points made above. It is also noted that the indicative housing layout included a central green space for amenity and recreational purposes, together with indicative compensatory planting throughout and around the perimeter of the site; • The Main Issues Report identifies the fact that the site is enclosed by mature woodland, which limits landscape impact, as a significant pro; • It is noted that the indicative housing layout suggested a housing density of approximately 0.061 hectares (0.15 acres) per unit, which is comparable to the SP1 Kinellan site within the Proposed Plan, which has an indicative housing density of 0.066 hectares (0.16 acres) per unit. For the avoidance of doubt, the final housing density for The Nutwood would be determined by the principles of sustainable use of land and necessary flexibility to provide appropriate affordable or smaller housing to meet local needs, whilst providing ample green space. It is proposed that as part of the site designing process, the principle is set for a significant green buffer to be established between the edge of the development and the Outstanding Conservation Area to the south. This will address concerns raised by the Strathpeffer Community Council and the comments made by the Forestry Officer of perceived lack of open space. The Committee Report suggests an “absence of any evidence explaining public benefits of the scheme”. • The development would create an opportunity to prepare a Tree Management Plan for the area that would safeguard and enhance the amenity value of the vicinity. • By applying modern designing principles, any increase in the unit number (above the current allocation of 15) will allow for a greater contribution to be made for much needed affordable homes in the area. • The development would create an opportunity to enhance linkage and public access to the Eaglestone Schedule Monument; • The development would create opportunities for

improved public access to, and within, the ancient woodland and to the golf course amenity land to the north; • As a viable development site, The Nutwood will improve the ability of Strathpeffer to deliver its housing requirements and help reduce the dependency on a single housing site (SP1), which is subject to its own constraints. Concerns were raised about the “accessibility of the site by a choice of transport options”. • It is noted that the development would benefit from an active travel connection via the path to the Eaglestone Schedule Monument and that opportunities will be created to enhance this further for pedestrian and cycling use; • It is noted that the existing link between The Nutwood and the village centre is less than a five minute walk. It is noted in the Committee Report that the site is “not required to meet the housing land requirements in the part of the Wester Ross housing market area that lies within the Plan area”. • As a viable development site, The Nutwood would help mitigate against the risks and dependency on a single housing site (SP1), as currently presented in the Proposed Plan, in delivering the housing requirements for the village of Strathpeffer and the wider area.

Allocated to

Customer Number  Name  Organisation

Agent Name amd Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

Comment Changes

Representation

Allocated to

Customer Number  Name  Organisation

Agent Name amd Organisation (if applicable)

Section  Paragraph

Reference  Type  Comment Late

Comment Changes

Representation

Allocated to

Customer Number	00321	Name	Kit Bowen	Organisation	Strathpeffer Community Council
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	See attachment below	
Reference			Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

**Verbatim of attachment submitted by Strathpeffer Community Council**  
**REPRESENTATIONS OF STRATHPEFFER COMMUNITY COUNCIL (SCC)**  
**INNER MORAY FIRTH PROPOSED DEVELOPMENT PLAN**

The SCC comment as follows:

Paragraph 4.171

The SCC welcome protection for the Conservation area which they believe has not been given sufficient protection in the past.

Paragraph 4.172

Agreed

Paragraph 4.173

The following rewording is suggested:

Tourism plays an important role in Strathpeffer’s economy. The village has several hotels and guest houses and the Strathpeffer Pavilion is now a popular events venue. The former railway station **hosting the Museum of Childhood** is an important facet of the local heritage, and is now occupied by a number of business and tourism uses. There are future plans to **reintroduce a steam railway which would involve** developing the former station further by building an engine shed and educational museum and reopening part of the railway as a visitor attraction. Housing growth **will now be** directed to the western fringes of the settlement.

The SCC also believe that the area designated for SP2 is incorrectly located: The Strathpeffer Steam Railway Association (SSRA) would intend to place the engine sheds behind the Scottish Woodlands /old Tourist Board building, although it is tru that they would be looking to a length of track as well. Contact with the SSRA is suggested.

Paragraph 4.174

Noted although for clarity the SCC would like to see conservation matter separated from drainage with a fresh numbered paragraph.

SP1

#### Water run off

It has been explained that the IMFDP refers to future development not the correction of current problems, but in this case the SCC disagree. ANY possibility of increased water run off cannot be permitted until the existing system is upgraded/repared. Holding tanks, which seem to be the engineering solution, must run off at some point (unless they can be pumped out at a time of low flow). The SCC have asked for a full hydrological survey, and would like to see this made available, together with the cost of remedial works as a precondition of any development. Surface water run off regularly lifts drain covers and has in the past lifted tarmac, and any further run off increases the risk of flooding. It is believed that a significant part of the current drainage system is Victorian and not fit for current use.

The SCC see this as a critical matter and are not convinced that earlier holding schemes have been effective (although clear felling of Ord Wood may have compounded issues).

#### Housing capacity

Strathpeffer is already having difficulty in integrating the two ends of the village and the introduction of a further 67 houses is considerable increase, albeit that this is a 20 year plan.

#### Position of cost housing

The SCC strongly believe that housing should be integrated, and do not want to see the 25% allocation of high density low cost (affordable) housing 'parked' on the flat ground; housing types should be mixed throughout.

The SCC continue to believe that there should be a green belt between the main village and the Loch Kinellan area. Were this instituted this might partly solve the problem.

#### Sheltered housing

The SCC believe that there should be specific provision for sheltered housing to meet the needs of a community that is gradually growing older; this is 20 year plan.

#### Cycle links

These are not mentioned and should be integral to any plan.

#### B1

This refers to the abandoned request for a Business Park. In discussion at the road show it transpired that this had been in the balance but lost out because of visual impact (cross referenced by the Responses to Main Issue Report). Once again, this is a 20 year plan. The SCC believe that all communities should have places from which they can work, and that small workshop/office provision should be integral to community plans. If trees were planted now they would effectively shield business development in 10 to 15 years. The SCC would like to see this re-considered.

Allocated to	Strathpeffer	General	General	
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Customer Number	04192	Name	IAN CHERRETT	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Strathpeffer, 4.171 & 4.172	
Reference	As resident of village in agreement.		Type	Support	Comment Late
					No

Comment Changes

Representation

Agree but would appreciate further information on the text that says "The council intend to ... draft a Conservation Area Management Plan". What exactly does this mean? As a resident I am acting on behalf of my sister who is the owner of the plot to the west of the village (reference 57 35'20 to 23 N and 4 32'30 to 38 W) and would like to build her retirement home there. She retires in two years. It is understood that for that purpose there is a need for this land to be incorporated into the urban area of the village and to comply with a series of planning norms. For the latter that is understood and accepted for the former what are the steps required to reassign the land? We both believe that it is a natural part of the urban area, not being large enough to serve an agricultural purpose. With your instructions on how to proceed she would be willing to provide you you with all the required information.

Allocated to	Strathpeffer	General	General	
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Customer Number	01015	Name	Mr Alastair Dunbar	Organisation	
Agent Name amd Organisation (if applicable)		Mr Richard Heggie		Urban Animation	
Section	4.Development Allocations		Paragraph	4.170-4.174 and 3.16	
Reference	Site SP1		Type	Change	Comment Late
				No	

Comment Changes

Extend the SP1 Housing Site to include additional land at the south west (see plan).

Representation

These representations relate to previous representations on behalf of our clients, at the Call for Sites and MIR stages, regarding land at Kinellan Drive, Strathpeffer. The Council’s vision for a vibrant Inner Moray Firth depends on many factors. The LDP proposes Growth Areas from Inverness to Nairn and in Ross-shire. In the case of the Ross-shire Growth Area, there appears to be a discrepancy over the extent of the area covered. Map 3 suggests Strathpeffer is excluded but Map 6 suggests it is included in the Growth Area. Para 4.172 of the LDP suggests Strathpeffer lies beyond the Growth Area and as a result, expansion is restricted. Either way, Strathpeffer is an important settlement in accommodating some of the supporting services, facilities and homes to meet the needs of an expanding workforce and population in the Ross-shire Growth Area. It is a particularly attractive town and can contribute to the range of housing opportunities required to attract growth. In this respect, it is perhaps surprising that a only limited amount of housing land is proposed at Strathpeffer. Our clients support allocation of their land, which forms the southeastern part of the SP1 housing site. However, given the need to accommodate growth and the obvious attractions of living at Strathpeffer, it is suggested that the SP1 site should include additional land in our clients ownership to the south west of the allocated site. This expanded site area would provide a logical southern edge to Strathpeffer, rather than the somewhat random boundary formed by splitting our client’s field in half. The remaining land is of very limited agricultural value, given its acreage. Allocation of this additional land for housing development would have a very limited landscape impact and is likely to have less of an impact upon the Slavonian Grebe breeding site than other parts of the SP1 site (which may themselves have no detrimental impacts). It forms a natural extension to the SP1 site and would share the same vehicular access, services and drainage. It would enable enhancement of the adjacent TPO and a holistic approach to landscape design at the edge of the settlement. This could allow larger pockets of greenspace to accommodate distinctive specimen trees, reflecting the character of the outstanding Conservation Area at Strathpeffer. Detailed information submitted previously on the Site Form for the allocated area apply equally to this land, There appear to be no sound planning grounds to exclude this land from the allocated site. Para 4.174 of the LDP notes there are issues with surface water drainage at Strathpeffer. It is once again noted that these issues are the responsibility of Scottish Water and should be resolved at the earliest opportunity by Scottish Water. Development of our client’s land will in not exacerbate the surface water problem. On the contrary, it is likely that SUDS design can improve the historic problem of a system owned an operated by Scottish Water which is not fit for purpose and has not been of an acceptable standard for many years. It is noted that the LDP proposes 67 houses on the SP1 site. Para 2.12 of the LDP notes that Site Capacities are indicative. The LDP Requirements for the SP1 site state that a master plan or development brief should be prepared. It is suggested that this document should provide detailed information on the appropriate density and number of houses to be constructed on the site which may prove to be somewhat more or less than 67 houses. This is consistent with other development plan policies, notably Policy 28 ‘Sustainable Design’, and Policy 29 ‘Design Quality and Placemaking’ in the Highland-wide LDP. These policies could be cross referenced through an additional note in the SP1 Requirements.

Allocated to	Strathpeffer	SP1	Kinellan	
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Customer Number	04456	Name	Esmee Scott	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Kinellan	Paragraph			
Reference	SP1	Type	Change	Comment Late	No

Comment Changes

Don't bother thinking of developing on this ground. Not suitable because of water logging

Representation

This site has already had tests done on it to see if suitable for housing. I believe the results said not suitable because of ground not suitable this area is subject to a lot of water logging and has a considerable dip which ends up like a pool when weather is bad and causes problems. I don't want houses built at the back of my house in case I end up getting flooded. If your proposal goes ahead I would expect some sort of high barrier put up so as I don't have to look at another building or a road. At the moment it's a nice quiet place and houses being built could take price of existing properties.

Allocated to	Strathpeffer	SP1	Kinellan	
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Customer Number	02237	Name	Caroline Rham	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	4.170		Type	Change	Comment Late
				No	

Comment Changes

We would like the village envelope boundary and residential zonning area to be extended slightly at SP1

Representation

We are supportive of the current IMFLP in respect of its provisions for Strathpeffer – and specifically at Kinellan. We would respectfully request however, that the village boundary is very slightly enlarged as shown of the accompanying plan to reach up to the existing public road. It is not currently included - reasons cited are its close proximity to the Listed Kinellan Farmhouse and to Loch Kinellan. However, we would seek permission to extend the village boundary and residential zone just a little further up to the lane but behind Kinellan Farmhouse (Attachment 1), for the following reason – we wish to restore the farmhouse to its original aspect of a farmhouse and affiliated farm buildings (Attachment 2.) The property was originally set in front of traditional steadings when we moved to the farmhouse in 1994, however these were subsequently demolished by their owner and replaced by a house of modern design. We would like the opportunity to reinstate the aggegration of farmhouse and supporting buldings by securing permission for a single development north-east of the rear of the farmhouse which replicates the steading design and appearance of the original buildings, but using materials that will create an energy efficient home for a young family member who wishes to remain working in the Highland energy industry. The area was inspected by a planning consultant in the summer (unable to contact him today to get his permission to attribute this to him by name in this submission. He commented: ‘There is precedence for subsidiary buildings (in a cottage style), outbuildings and stables, coach houses, for instance to be associated with such a house and in this connection the new build could be designed accordingly....complementing the design....also acting as a visual link to the new development.’ The ground slopes away down from the farmhouse at this location, indeed it would be hard to see from the road or from any approach to the farmhouse and it is our intention to reflect entirely the style and aspect of the original buildings that used to stand to its rear. We take into account the natural habitat at Loch Kinellan and although, as previously stated, there are around 10 family houses more closely located to the loch which is a popular walking spot, we would be happy to commit to no further residential permission to be granted at this location within the village boundary. Also as previously stated, our reason for participating in a community purchase of the loch some years ago was to retain its value as a wildlife habitat and we would not wish to compromise this in any way.

Allocated to	Strathpeffer	SP1	Kinellan	
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Customer Number	04191	Name	David Cameron	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	SPI-67 Homes		Type	Change	Comment Late
				No	

Comment Changes

Exclude SPI -Kinellan from the Inner Moray Firth Proposed Development Plan or if this is not accepted reduce the proposed density to 20 homes. Also, exclude any part of the high ground to the north of the proposed site from all development. Adequate undeveloped housing land is currently available in Strathpeffer to meet housing needs for the foreseeable future. The plan does not make adequate provision for dealing with the extra traffic to be generated at the junction of Kineallan Drive and GardenHill /Main Road. The proposed development SPI- Kinellan encroaches onto the important recreational/ wild life area of Loch Kinellan.

Representation

1) The proposed development is out of character with the village of Strathpeffer and if included in the Development Plan will be a continuation of the urban sprawl; which has already changed the attractiveness of this important Spa Victorian Village. It will be a shame, if Strathpeffer is to become a dormitory town; thus removing its special status, as the most northern Spa village in Europe. 2) There is no need for the release of this proposed development site (SPI-Kinellan) as there is already a substantial area of housing development land available for new homes to the north of the Strathpeffer Community Centre. 3) 67 homes is too high a density for the proposed development, as this number of houses could generate around 130 extra vehicles which will use this already overloaded junction with Garden Hill/Main Road from Kinellan Drive. Close by is the access road to Blackmuir Woods with its inadequate sightlines, where one exits onto GaredenHill /MainRoad. To increase the volume of traffic at the Kinellan Drive Gareden Hill /Main road junction does not make any sense from a Highway safety point of view! 4)The nearby Loch Kinellan is a very special area for locals/ visitors and wild life and to overcrowd this attractive recreational area with urban style housing is inappropriate.

Allocated to	Strathpeffer	SP1	Kinellan	
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Customer Number	04259	Name	Margaret Bluefield	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.173	
Reference	SP2		Type	Change	Comment Late
					No

Comment Changes

I wish to object to the proposed railway development on this site.
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Representation

I have lived at Railway Cottage in Strathpeffer for the last 27 years after purchasing it as a derelict property and have acquired over that period of time considerable very local knowledge of the area proposed for development. The first point I would like to raise is that the trustees of the Museum and station have rejected plans for the steam train to come into the station on the grounds that it would disturb the peace and ambience of tourists and locals who use the station for recreation and with this in mind the railway association have lodged a planning application which falls well short of the station itself making nonsense of the proposal. The plans are for a very short length of track on a recognised, sign posted footpath used by locals, tourists, farm access and the acclaimed Knockfarrel Hill Race. A cycle path from Strathpeffer to Dingwall has been proposed which meets the criteria for lowering our carbon footprint, improving the safety of cyclists, preserves the habitats of wildlife whilst enabling walkers to continue to use a very popular access to the countryside. The development of a track and steam train will create the opposite - very high carbon footprint, spoil heaps, reduced or no access to walkers, disturbance of wildlife habitats and high levels of pollution and noise.

Allocated to	Strathpeffer	SP2	Railway Station	
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Customer Number	04270	Name	David John	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	SP2 Strathpeffer Railway Station	
Reference	SP2 Strathpeffer Railway Station		Type	Change	Comment Late
				No	

#### Comment Changes

This proposal should be deferred pending the proposers submitting a credible business plan, planning application, land owners consents and funding statements for their whole project, not just Phase 1. Approval at this stage would cause planning blight on nearby houses and reduce the possibility of attracting funding for the proposed footpath/cycleway between Strathpeffer and Dingwall.

#### Representation

Briefly, to put into context my experience to make the following comments I have been involved in railway preservation for over 45 years; •I have done physical labouring work on steam locomotives, rolling stock and track, •I chaired the meeting which formed the Vale of Teifi Railway, south Wales’ first preserved narrow gauge railway, •I was one of the authors of a successful £18 million bid for the Welsh Highland Railway. My main objection to this proposal is that it is based on the dream of a handful of people. As a project it has not been properly costed nor has any sort of viability study been carried out (or if not has it has been kept secret). Fundamentally is it right that so few people can impose ‘planning blight’ over so many houses in this essentially residential part of the Strathpeffer conservation area? In summary my objections to this proposal are: •Lack of Consultation. There has been no public consultation. A small number of people are involved with the project and they are happy to talk about it, but the business plan, development plan, environmental impact assessment and Health and Safety case have been kept closely guarded. •Project Cost. The average cost to reinstate a railway over an existing trackbed is £2 million per kilometre, a length of 2.5 kilometres would therefore cost in the order of £5 million. Buildings, stock and infrastructure costs would easily add a further million. •Competition. There are two Heritage Railways in the Highlands, at Strathspey and Keith and Dufftown. Both are in a precarious financial position and struggle for visitors, volunteers and donations. A third railway in the area could very well prove enough of a distraction to kill off all three. •Heritage Railway? The whole point, surely, of a Heritage Railway is to preserve the heritage. There is nothing for the SSSR to preserve – simply, there is no heritage. The locomotives and carriages that served the line are now scrapped, the original build are all gone (with the exception of the station, which has already been saved and is more financially safe under its current ownership. What would go in a museum? There are no major artefacts available.. A small ‘Kyle Line’ museum already exists on Kyle of Lochalsh station and this is being extended to the recently restored signal-box. This proposal will be competing with those attractions and all exhibits would be copies of material already published and freely available. •Not viable. Existing small railways are not in a financially healthy position. A number have failed or a hanging-on due to the investments of a ‘fairy-godfather’, some projects, such as the Meon Valley have failed losing substantial sums of money for the authorities and local investors. Established railways, such as the Tallyllyn are in financial straits. A proposal such as this is, essentially, a stand alone Interpretation Centre with no chance of ever raising enough revenue to pay for its running costs. •Grants? The most obvious source of grant funding would be the Heritage Lottery, but the lack of anything with any unique heritage in this proposal reduces the possibility of an HLF grant to zero. Nor would the SSR be eligible for a Railway Heritage Trust grant as the SSSRA cannot meet the essential eligibility criteria. EU funding would also be very unlikely when compared to the extreme rural poverty in Eastern Europe. The fund that could realistically invest is LEADER and the lack of jobs, the size of grant needed and the degree of local opposition would kill this in the water. Network Rail and Scotrail will prefer to place any spare funding in the area into the Kyle line and are likely to oppose, never mind support, anything that could take passenger numbers from their line. The cost of the proposal would rule out anything available from Highland Council and the lack of jobs, economic or tourism merit would rule out the Scottish Government. •Manning. A Heritage Railway requires a lot of man-hours, particularly if the work has to be carried out by volunteers. And a lot of volunteers –many of the jobs are specialised and highly skilled, requiring accepted professional and vocational qualifications: it is not just grown men playing trains. This is an area with a small population and such skills will not be in abundance. The railways could not recruit existing volunteers from the Strathspey or Keith & Dufftown railways as this would be a mortal blow to those lines. If it is intended to employ contractors to do the work than the costs will increase fourfold. •Visitor numbers. The railway would require large numbers of people – indeed, what would be the point of a visitor attraction that did not attract visitors? The Table below is a simple calculation assuming a capital requirement of £6, 000,000, and giving the railway loans of £225,000. A 6% interest has been used and with a pay back period of 19 years. Service the debt would cost in the region of £360,000 per year. The calculations have a maintenance charge of 10%, I have also allowed £10,000 for overheads The UK average cost for running a steam engine for a day is £3,000, if this railway could do it for half that and If we say the railway runs 100 days per year at £10-00 per person adult fare. In those circumstances the railway would have to attract an average of around 1,120 people per day. Is there any record of any local attraction drawing any near that number of visitors? Even if my figures are out by as much as 50% it can be seen that

the project would still not be viable. ItemTotal Total Capital Required£6,000,000 Assume 50% in grants£3,000,000 Balance£3,000,000 25% of balance raised in cash£75,000 Loans £2,250,000 Total compound interest at 6% over 10 years£1,350,000 Total Outgoings over 10 years£3,600,000 Annual Expenses Repayment of loans (Over 10 years)£225,000 Service interest £135,000 Maintenance (10% of cost capital items)£600,000 Overheads (say)£10,000£970,000 Daily Expenses (Operating 100 days p.a.) Apportioned annual expenses£9,700 Operating costs £1,500£11,200 At £10 per adult trip – average passengers per day 1,120 At 3 people per car – average number of cars per day374 Say 5 trains per day – average cars per train ride75 Car parking spaces required (half on train, half waiting)150 Allow variation of summer peaks – total spaces required300 •Tourism or Heavy Industry? The area around Strathpeffer station houses a number of tourism businesses and an office complex. All of which bring necessary jobs to the area and small-scale similar development would add to the mixed economy of the village. However, this proposal would require vast sums of money, not create any jobs as all the work would be carried out by volunteers and would create noise, dirt and danger incompatible with the existing businesses and the conservation area status of its surroundings. A medium sized steam locomotive consumes around 5 tons of coal per hours, a small one about half that, At 8 hours per day for 100 days that is around 2,000 tons to be delivered and stored. A small steam locomotives weighs over 30 tons, a medium sized one around 80 tons, a coach is around 60” long. They all have to be delivered (and periodically taken away for repair) which requires heavy duty articulated road vehicles and heavy lifting equipment. Such vehicles would not clear the railway bridge between Fodarty and Dingwall so all this heavy traffic would have to come through the village. All Heritage railways create a ‘linear scrap heap’ – just look at the Strathspey and Keith lines. A heritage railway is usually long enough for such ‘to be hidden from view. On this line it would have to sit alongside the line, defining the Cat’s Back and Knockfarel with a footing of ‘scrap’ metal. The coal and steam create dust and noise. Steam has to be raised for a good four hours prior to the locomotive being used. So a 10 o’clock start would mean work on the locomotive, JCB’s loading coal, stem pumps moving water, etc, would have to start around 6 a.m. unacceptable surely in this a residential area? The table above also shows that the railway has to attract around 1,200 people per day, generating and average of 374 cars and requiring around 300 car parking spaces. The existing service road for the site is unsuitable for the level of traffic it currently has to service. It is an access road to private houses. It is unsuitable for the increased levels of traffic the current businesses on the site generate – a development opposed by local people at the time. The visibility splays are unsuitable and dangerous. The access road is also unsuitable for the heavy haulage vehicles that would be required from time to time and there is nowhere within the plan for a car park with in excess of 300 spaces. All this would necessitate another entrance to the site, with better visibility splays and a more level access and hardstanding for lifting such heavy weights. Many complaints regarding visibility are made to Highland Council. Ulva, the house on the corner, regularly has to keep roadside hedges trimmed at their own expense. Horns are blasted at ‘near misses’ three or four times every day. •Public Right-of-way. The route eastwards from Strathpeffer Station has been promoted as a public footpath for many years. The Strathpeffer Community Association is currently raising funds to develop it further as a footpath/cycleway joining Strathpeffer to Dingwall. This ambition is incompatible with that of the SSSRA yet both are currently raising money. The footpath/cycleway would be of much greater community benefit and support initiatives for safer routes to schools and to encourage walking and cycling in a safe environment. The Prescott Enquiry in Gwynedd established it is impossible to reconcile leisure trails and trains on the same track-bed. The proposal in the Murray Firth plan is no more than Phase 1 of the plans of the SSSRA, the promoting group. Their long-term aim is to “to extend the track in stages until it meets up with the main line to enable steam trains to run to Dingwall and Kyle of Lochalsh. ‘The ultimate aim is to have steam trips right through to Kyle,” said Mrs Dovey”1. I think it therefore reasonable to consider the whole project in planning terms rather than approve Phase 1, with its implied approval of future phases. From my experience I would argue that this idea is no more than a dream. It has no chance of becoming a reality yet this proposal, if approved, would cause planning blight to a number of residences and give tacit approval for the promoters to try and raise money from the general public – all of which will come to nothing in the fullness of time. Rather than encourage this dream any further I would ask that this proposal is dropped from the Moray Firth Plan and that the promoters are asked to prepare a realistic business plan, a realistic estimate of costs and indications of where and how the necessary funding will be raised. This should be for their whole project (Not just Phase 1) and there should be extensive public consultation. Bearing in mind the SSRA; s ambition to run trains through to Kyle – meaning that Scotrail would no longer be the Train Operating Company on that line - the consultation should be across the whole of Wester Ross. It is against natural justice that local householders have to prove a negative to protect their properties against the “wonderful idea1” of a handful of people. As a final thought, their stated long-term ambition is fulfilled: steam engines already run between Dingwall and Kyle. 1 <http://www.strathpeffervillage.org.uk/ssra>

Allocated to	Strathpeffer	SP2	Railway Station	
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Customer Number	04374	Name	Paul Stariski	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	Business: Site SP2 Railway Station	
Reference	Site SP2 Railway Station		Type	Change	Comment Late
				No	

Comment Changes

I strongly object to the development of the railway line and would like this proposal to be stopped.

Representation

Whilst I personally like steam trains, I do not believe that this scheme is a viable one. My main concerns are as follow: 1. We have our heating oil delivered via the old railway line (between our house and the offices below us), and would still need access for this purpose. We have been granted a letter from the Council for right of access across this land. Should this scheme be granted and achieve its ultimate goal of extending into the station, this access would be cut off. 2. Noise levels from steam engines - Having experienced steam trains in the past, I know that they are extremely noisy and we do not wish to have our peaceful area shattered by the noise of steam engines, whistles and general industrial noises of delivering coal and building up a head of steam in the engine early in the morning. 3. My two sons and I all suffer from asthma and I am greatly concerned about the amount of sulphurous coal smoke and soot from the engine, as this does cause breathing difficulties (I can provide certification of our conditions from our GP). Not to mention soot deposits landing around the property and on washing hung out to dry. 4. A blight on the landscape - This is a conservation village and I do not believe that fulfilling a small number of people's dream of having a big toy train set with all of its accompanying industrial paraphernalia will add anything to the village. 5. A waste of money - I do not believe that this will be a viable proposal. If it gets planning permission and is actually built, it will not attract enough tourism to survive and we will end up with a lot of rusting scrap metal on our door steps as a lasting legacy. 6. Foot and Cycle Path: The old railway track, I believe was proposed as being developed as a cycle track linking Strathpeffer to Dingwall. This surely would be a much better prospect, promoting clean environmental and safe transport for school children and commuters alike. The road between Strathpeffer and Dingwall is a terribly dangerous road to cycle and a cycle path along the old railway line is the best solution. It would benefit many more people than the rail proposal.

Allocated to	Strathpeffer	SP2	Railway Station	
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Customer Number	04267	Name	Jacobus de Man	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.173	
Reference	SP2		Type	Change	Comment Late
				No	

Comment Changes

We are strongly against the re-opening of the railway + steam train in Strathpeffer.

Representation

Our house is situated just 30 meters from the proposed track and we are concerned about potentially substantial noise and pollution. With all the soot and dust created by the steam, we would no longer be able to spend time in the garden, put our washing out to dry or even open the windows of our house. Something that will certainly increase the pollution is the fact that the village is situated in a valley and already fog is lingering around often. As we understand there is renewed interest from the council (and many locals in our village!) to establish a footpath / cycleway over the old track bed to link Strathpeffer with Dingwall. This would be a priority to us, as it would allow people – of whom many children / youngsters and tourists alike – to make a safe journey from A to B. However, the plans for a steam train would contradict this. We often use the back of our garden to access our house, which would not be possible if the old rail track is being taken back into use for a steam train. While it is difficult to look in the future (and we certainly are not able to look in the wallet of the steam train group) we think that such a bold plan will be hard to get off the ground and more importantly to maintain in the long run (look at the difficult situation at Strathspey). The financial and human resources are in our opinion very limited.

Allocated to	Strathpeffer	SP2	Railway Station	
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Customer Number	04515	Name	Jock Watt	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	SP2		Type	Change	Comment Late Yes

#### Comment Changes

I feel that this project should be shelved until such time as it is fully and realistically costed from the Capital and Revenue point of view. I question the level of local support. I feel that there should be a full impact study. I also feel that the length of run proposed does not justify the financial outlay. Accessibility to and from the station is not good and causes problems for users.

#### Representation

The project has not been fully thought through from the Capital and Revenue point of view. How are Capital and Revenue cost to be funded? What is the availability of grant support and what about the impact on other local demands for finance? Proposed length is too short to be worthwhile for users. If there were to be a future extension at least two bridges would require to be constructed at great expense. Transport of plant to and from the site during construction and during repair and maintenance periods would cause considerable problems for the road network. There would be considerable noise pollution and nuisance during the firing-up of the engine. The whole project is incompatible with the existing use of the site, the Education Centre associated with the Childhood Museum does not suffer from overuse. To put another such facility associated with the railway would be overkill. Public consultation has been scant. The area leading to the rail track is liable to considerable flooding. Many attempts have been made to alleviate this over the years with no success whatsoever. As far as I understand the main sewer runs on or parallel to the rail track. I feel that this could present problems I do not see a market for the project. Other facilities of a similar nature are struggling to carry on operating.

Allocated to	Strathpeffer	SP2	Railway Station	
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Customer Number	04335	Name	Douglas Murray	Organisation	Strathpeffer Spa railway Association
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.173	
Reference			Type	Change	Comment Late No

#### Comment Changes

The Strathpeffer Spa Railway Association will not now enter into the old station but are planning to re-open a stretch of the old track, with an opartion base next to the Scottish Water Waster Water Treatment plant. See our planning application 13/03899/FUL

#### Representation

The area shown in blue in the current plan is therefore incorrect.

Allocated to	Strathpeffer	SP2	Railway Station	
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