

Highland Council Inner Moray Firth Local Development Plan

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

Customer Number	01017	Name	Mr Leo Daly	Organisation	BKB Property
Agent Name amd Organisation (if applicable)	Administrator Yvonne Macdonald		G H Johnston Building Consultants		
Section	4.Development Allocations		Paragraph	4.82	
Reference			Type	Support	Comment Late
				No	

Comment Changes

Representation

Also in Mr Daly's ownership is land to the south east of Knockbreck House which was identified as a "preferred" site MU2 in the MIR with potential for the medium to longer term development and intended to complement the uses on TN5. With the exception of the former roads depot at the southern tip of the site and its potential to be brought back into use in the short term (see our submission above under TN5), our client accepts reference in paragraph 4.82 to the longer term development potential of this land.

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

Comment Changes

Addition of "Pattern Book" design guide to plan.

Representation

Tain is an important historic town and we believe that the IMFLDP should recognise it as such. It should have a Pattern Book to support any future housing and commercial development within the settlement boundary. This should be drawn up with the Highland Council conservation team. To encourage new development to be of the highest standard the Pattern Book should lay out house types, a palette of materials, street widths etc. Without this there is a danger that future plans for housing such as those around the ASDA site will be disconnected from the historic core of the town and be low density cui de sac executive type development which is not appropriate for Tain.

Allocated to	Tain	General	General	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council	
Agent Name amd Organisation (if applicable)						
Section	Development Allocations		Paragraph	4.76		
Reference			Type	Support	Comment Late	No

Comment Changes

No Change

Representation

Town Centre... hopefully the Charrette application will be successful but if not then there should be some mention of commitment to enhancement of the central fabric of the town, focussed on the Conservation Area. We do not want the next Local Plan to be concentrating upon overdue policies of regeneration.

Allocated to	Tain	General	General	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council	
Agent Name amd Organisation (if applicable)						
Section	Development Allocations		Paragraph			
Reference	Tain links		Type	Change	Comment Late	No

Comment Changes

Modification of Boundary

Representation

The highlighted green area should be extended to the other side of river and along the shore as far as The Plaids, so this land does not miss out on any potential amenity improvement projects.

Allocated to	Tain	General	General	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph	4.76	
Reference			Type	Support	Comment Late
					No

Comment Changes

No Change

Representation

The Tain section is an improvement on Local Plans that have gone before in that the zonings reflect actual planning permissions and not just undeliverable developments.
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Allocated to	Tain	General	General	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph	4.76	
Reference			Type	Change	Comment Late
					No

Comment Changes

Improvements to A9

Representation

Road improvements are needed here in the interests of road safety, preferably to include roundabouts at the Morangie and Knockbreck junctions with speed limits restricted to 50 mph in-between. If the proposed 3-18 School Campus goes ahead at the Craighill site, and that then goes on to direct a southerly expansion of the town, practically located underpasses and/or pedestrian bridges will be essential, again in the interests of road safety.
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Allocated to	Tain	General	General	
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Customer Number	00964	Name	Balnagown Estate	Organisation	
Agent Name amd Organisation (if applicable)		Mr John Wright		Strutt and Parker	
Section	4.Development Allocations		Paragraph	Tain generally	
Reference	Tain generally		Type	Change	Comment Late
					No

Comment Changes

Identify “future areas for growth” South and South East of A9 for development in future plan periods, in particular MIR site H6 - Land at Hartfield.

Representation

Scottish Planning Policy (para 73) states that Local Development Plans should identify a range of sites which are effective or capable of becoming effective to meet the strategic requirement up to year 10 (from date of adoption), and should also provide an indication of the possible scale and location of housing up to year 20. This is to provide landowners, developers, infrastructure and service providers with certainty as to where future development is likely to occur. Tain forms a fundamental part of the Ross-Shire growth area being one of the four principle town centres and the main town centre in close proximity to Nigg Fabrication Yard and the employment opportunities that are being promoted there. It is therefore reasonable to assume that it will remain a focal point for development in future LDP’s and therefore future areas for growth should be identified in line with SPP. Whilst this site was not “preferred” in the Main Issues Report, one of the significant “pro’s” was identified as being that is was “adjacent to existing active housing development”. It is our view that, by virtue of the adjacent development, Tain has already expanded beyond the A9 and this no longer provides the defensible boundary to the settlement that it once did. Land to the north west of Tain is far more visually exposed, and would have a more significant landscape and visual impact, and more divorced from services and facilities than land to the south of the A9. It is also worth highlighting the presence of the new supermarket to the south of Tain which would make this area more sustainable than a northern expansion given the walking distance proximity to the supermarket. We have attached an example of how another Local Authority has taken this approach and would support the use of this in this instance.

Allocated to	Tain	General	General	
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Customer Number	04361	Name	Hamish J Mackenzie	Organisation	Tain & Easter Ross Civic Trust
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	Portmahomack (no para no.),Nigg (4.22), Tain (4.76)		Type	Change	Comment Late No

Comment Changes

Portmahomack: we are highly concerned that the proposed plan, unlike earlier ones, no longer shows a defined settlement area. Nigg: we suggest that consideration should be given to a new planned village for workers at Nigg Yard. Tain : should be recognised as an important historic town and should have a Pattern Book to guide future development.

Representation

3. Settlement Areas in Easter Ross 3.1 We have looked at the plans and maps in the draft IMFLDP for Fearn Aerodrome, the Fendom, and the Seaboard Villages and are happy with the proposals. We do , however, have comments on the omission of Portmahomack, and on Nigg and Tain. 3.2 We note that there is no plan or map for Portmahomack, despite the fact that Portmahomack was included both in the call for sites stage and in the initial consultations. We think that it is important that there should be a clearly defined settlement area, since •The lack of a defined settlement makes planning decisions, particularly those relating to the fringe of the village, largely dependant on the judgement of the particular planning officers who may be involved rather than on policies which have been democratically and transparently adopted. •Without a defined settlement there is bound to be uncertainty as to what is and what is not within the settlement and thereby an exacerbation of the ribbon development between Tain and Portmahomack alluded to in our comment at 1 above. •The ad hoc development between the village of Portmahomack and Rockfield around the farm of Seafield is an example of what will happen if an a clear plan is not in place. 3.3 Nigg 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. 3.4 Tain - suggested Pattern Book [Development Guide] Tain is an important historic town and we believe that the IMFLDP should recognise it as such. It should have a Pattern Book to support any future housing and commercial development within the settlement boundary. This should be drawn up with the Highland Council conservation team. To encourage new development to be of the highest standard the Pattern Book should lay out house types, a pal ette of materials, street widths etc. Without this there is a danger that future plans for housing such as those around the ASDA site will be disconnected from the historic core of the town and be low density cul de sac executive type development which is not appropriate for Tain.

Allocated to	Tain	General	General	
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Customer Number	00396	Name	Mr William Paton	Organisation	Scottish Water
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph	4.83 Page 92	
Reference	Tain		Type	Change	Comment Late
					No

Comment Changes

Suggest substitution of existing first sentence in para 4.83 to read: ""Whilst sufficient capacity currently exists at Assynt Water Treatment Works and Newtonmore it early engagement is required to take place between Developers and Scottish Water, to ensure any additional capacity demands in the future can be delivered in line with development."

Representation

As previously suggested this makes it clear that there is existing capacity and that a cumulative effect over time may require investment but does not present an issue currently.

Allocated to	Tain	General	General	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraphs 4.80 – 4.81	
Reference	Site Reference Tain Inset Map (page 93).		Type	Change	Comment Late No

Comment Changes

“ The identification and allocation of land lying to the west side of the A9, to the immediate west of the land presently occupied by them, for the purposes of safeguarding land to accommodate their long term development/expansion requirements.”

Representation

The requirement on the part of my client to have an area identified and allocated to take account of their long term development/expansion requirements arises as a direct result of the present and ongoing development of their facility, which is advancing at a pace that hitherto had been unexpected. As a consequence of the this level of ongoing activity, it is likely that the land presently allocated to accommodate the expansion of the site will be utilised within the short to medium term, and that accordingly, no land will remain which is able to accommodate the longer term development requirements of the business. My client controls an area of land lying to the west side of the A9, as identified on the plan, which is attached to and forms part of this Representation. Although this land lies on the west side of the A9, the settlement of Tain has already seen development take place on the west side of the A9, with it being noted that further residential development is planned to take place on the west side of the road through the allocation of Site TN4. Through the proper master planning, landscaping and design of this area, it is submitted that it will be possible to successfully bring it forward for development without giving rise to any adverse environmental or landscape impacts. Whilst this suggested long term land allocation is not required for development at this time, and can be identified only as a long term development site within the terms of the Plan without it actually being made available for development, there are significant benefits to be gained from formally identifying the future development potential of the site at this stage. Most notably, by confirming the future development potential of this site it will provide a high degree of certainty as regards the future of the land. By confirming and making clear the long term future of the site, it will be possible to provide my client with the level of certainty and confidence that is required to enable them to take forward the preparation and implementation of advanced programme of landscaping and site infrastructure works. The implementation of advanced landscape works, well in advance of the actual construction of the development to which they relate, is of particular relevance and importance to environmentally sensitive locations and can assist significantly in ensuring the successful assimilation and integration of the development into the surrounding countryside. For the reasons set out above, it is respectfully submitted that the land identified on the plan attached to this representation should be identified as a site for the long term expansion of the Glenmorangie Distillery.

Allocated to	Tain	General	General	
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Customer Number	04453	Name	Patricia Toshney	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	Tain	Type	Change	Comment Late	No

Comment Changes

Encourage more business to come to Tain

Representation

I would also like to say there is I feel more need for businesses to be encouraged to come to Tain to fill the already empty shops/units. Without employment what future has Tain - plenty of houses with even many more people unemployed and nothing else. There are already more than enough unemployment without more. In the last 50 years Tain has gone from being a busy thriving town full of shops and businesses to having not a lot to offer. I believe more time and effort should be put to bringing more to the heart / centre of Tain rather than building more houses.

Allocated to	Tain	General	General	
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Customer Number	00264	Name	Mr Stuart Campbell	Organisation	
Agent Name amd Organisation (if applicable)					
Section	3.Strategy for Growth Areas		Paragraph		
Reference	Plan for Tain	Type	Support	Comment Late	No

Comment Changes

Representation

I support the Plan and the prospect for growth within the boundary of the A-9 I ask the council to REJECT any outline planning permission for development of the farmland around St Vincent. It is unconscionable that having sold the farmhouse that the owner can then seek to transform fertile pasture into a housing development and profit from selling those rights. They would also have to create infrastructure via Viewfield Road which is also unsuited to development. Please keep me apprised of any applications from the current owner who is seeking to partition this historic land for his own economic benefit and ignoring the legal and moral rights of the current homeowners.

Allocated to	Tain	General	General	
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Customer Number	04030	Name	Alison Taylor	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	TN2 170 houses		Type	Change	Comment Late
				No	

Comment Changes

Landscaping should provide "Amenity Buffer Zones" between existing and new houses so that hedge/fence/ garden maintenance can be carried out

Representation

Existing properties in Provost Ferguson Drive, Moss Road, Manse gardens and Stagcroft should be given the benefit of such an amenity corridor. This was raised by HC Planning Officer James Farquhar in report RP34/07 and has been actioned in Tain already.

Allocated to	Tain	TN2	Land to rear of Craighill Primary School	
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Customer Number	04214	Name	Peter Cabrelli	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	TN2		Type	Change	Comment Late
				No	

Comment Changes

This is not a change to the proposed Plan, but an objection. We believe that the impact with respect to the potential for flooding of our property has not been adequately addressed or communicated in a satisfactory manner. We would therefore welcome a site meeting with a member of your team to discuss your Hydrology Survey Findings / Report and understand how you propose to disperse run-off water to the North East of the proposed development area, in a satisfactory manner. We would be interested to understand what your overall Drainage Philosophy is and how you intend to deal with the substantial increase in surface water generated by your development.

Representation

We believe that the impact with respect to the potential for flooding of our property has not been adequately addressed or communicated in a satisfactory manner. We would therefore welcome a site meeting with a member of your team to discuss your Hydrology Survey Findings / Report and understand how you propose to disperse run-off water to the North East of the proposed development area, in a satisfactory manner. We would be interested to understand what your overall Drainage Philosophy is and how you intend to deal with the substantial increase in surface water generated by your development. The basis of our opposition to the proposed development is that we strongly believe that no consideration has been given to the dispersal of run-off water from the high ground to the South West of our property, 10 Provost Ferguson Dr. We have invested a considerable amount of money to ensure adequate drainage to our property and are concerned that housing adjacent to our property will overload this and cause flooding. Having reviewed your plan our property lies at the foot of Craighill with no natural drainage other than through our property and those adjacent properties on Moss Road. Currently no natural drainage exists to the area which lies to the North of the proposed development, moreover with this being at the base of Craighill and the boundaries to the North East and North West having already been fully developed with no available space to install drainage, our concern is that there is no where for water to run other than through the existing properties. The attached <<10 Provost Ferguson Driv1.doc>> is the copy of the latest of a number of letters submitted to you and from which we have still had no response. We would urge you to reconsider your proposal and wish to take this opportunity to formally advise you that we will be lodging this representation with our insurance company. Should your proposed development proceed and in the event that our property suffers flooding or water damage, which can be attributed to your proposed development, we will be seeking compensation for damages caused.

Allocated to	Tain	TN2	Land to rear of Craighill Primary School	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

The proposal for 170 homes is excessive compared to the number of properties in surrounding similarly sized areas. I'm most concerned about the potential loss of playground space for the primary school. We should be encouraging our children to be active and this is best achieved by the provision of outside space The number of homes should be reduced in number and the playground area safeguarded

Representation

As per comment changes representation.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

That plots immediately to the rear of existing housing should be single story only in height.

Representation

In order to preserve the amenity and privacy of existing housing which back on to site TN2, no new build should be higher than single story. The majority of existing properties are bungalows and any new build exceeding a single story will look directly into their bedrooms. This has been previously raised in the HC Report 06/0069697/OUTRC

Allocated to

Customer Number	03984	Name	Peter Reynolds	Organisation	
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	TN4		Type	Change	Comment Late
				No	

Comment Changes

As per representation.

Representation

Last week I received from you a notification of publication of the above plan, including a supposed proposal to allocate TN4 for 23 homes. In fact far more houses have already been built than are shown on the map you sent me, the whole of the area around Rowan Drive/Birch Place being now filled up apart from maybe 2 or 3 plots that have not yet been built on. The area around Benview Road has 10 properties in process of construction along Benview Road and Jackson Drive, so the only area within the red box still available for building is alongside the south-east boundary of TN4 behind Benview Road/Jackson Drive. As the corresponding area along Jackson Drive/Benview Road has only had space for 10 properties which are just about completed, there is no way there is space for another 23 behind them, only a maximum of about 10. Here are my general comments on construction in this area: 1) The Tain Active Travel Audit identified a possible through bus route from Benview Road to Rowan Drive, which appears to have been blocked off by private house gardens now. 2) The Tain Active Travel Audit included the need for improvements for the considerable number of people crossing the A9 at Quarry Road or at Scotsburn Road rather than using the underpass half way between these two roads. Nothing has yet been done despite major construction works at the junction of Craighill Terrace and the A9. As yet more houses have been built or are going to be built within the orthern part of TN4 and there is a new Health Centre and Old People's Home in process of construction at the top of Craighill Terrace, a considerable increase in pedestrians crossing the A9 at Quarry Road/Craighill Terrace would be predictable over the next 1 to 3 years. 3) The Tain Active Travel Audit identified a future pedestrian route behind the A9 from the new Asda to LIDL, so that people do not have to walk alongside the A9 as they do at present, at least they can often be seen on the boggy grass alongside the A9 between Craighill Terrace and Morangie Road. The Highland Council appears to have no clear strategy for implementing this, but seems to be relying on individual members of the public pushing it through as each individual planning application along the route comes up. This is a ridiculous approach to town planning, as people who do not live immediately adjacent to future properties have no easy way of knowing when new planning applications are coming up. So far as I know there is no automatic email notification system, for instance, and neighbour notifications are waived in the case of major developments in favour of adverts in the local paper, despite the neighbour notification fee still being charged to the developer - I know this because we built an extension and our neighbours were not notified. 4) There are no community facilities in TN4/Jubilee Drive/Viewfield Road area apart from a hotel/restaurant/bar (Carnegie Lodge Hotel). A convenience store and a post box should be available to the growing population outside the A9.

Allocated to	Tain	TN4	Rowan Drive	
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Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Representation

Highland Housing Alliance supports the above site.

Allocated to

Customer Number Name Organisation

Agent Name amd Organisation (if applicable)

Section Paragraph

Reference Type Comment Late

Comment Changes

Area within TN5 in front of Burgage Court earmarked for more housing – change should be made to account for the 7 protected trees in front of houses 10 – 16 Burgage Court grass area. No allowance has been made for this in the plan. Being protected the trees cannot be removed.

Representation

There are so little grass areas within housing sites these days and trees are part of the beauty of this area. Building more houses on one of the last grass parks within easy reach of the many houses within this site would destroy my living area and privacy and would take away a play area for the children around here. The Links is certainly outwith most children's reach unless accompanied by an adult. It would be more condusive to landscape and put some play equipment on the area.

Allocated to

Customer Number	00419	Name	Mr Donald Lockhart	Organisation	Albyn Housing Society Ltd	
Agent Name amd Organisation (if applicable)						
Section	4.Development Allocations		Paragraph			
Reference	TN5		Type	Change	Comment Late	No

Comment Changes

To facilitate the earlier development of the Seaforth Rd section (in the ownership of an RSL) with access direct from Seaforth Road

Representation

This approach will allow some affordable housing to be developed in a controlled and responsible way which is not reliant on the timescale of the larger development

Allocated to	Tain	TN5	Knockbreck Road	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council	
Agent Name amd Organisation (if applicable)						
Section	Development Allocations		Paragraph			
Reference	TN5		Type	Change	Comment Late	No

Comment Changes

Location of Business uses elsewhere

Representation

The Community Council has already dismissed this area as being quite unsuitable for Business and Commercial uses and we would wish to reaffirm that opinion. We have already asked for a designated Business Park and given the reasons therefor, but that request appears to have fallen on deaf ears

Allocated to	Tain	TN5	Knockbreck Road	
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Customer Number	04453	Name	Patricia Toshney	Organisation	
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	TN5	Type	Change	Comment Late	No

Comment Changes

Trees to be referenced in future plans

Representation

I write with reference to the above plan but relate in main to the grass area in front of Burgage Court, Tain. I have lived in Burgage Court for over 30 years and bought my house some 12 years ago. The grass area in front of my house has been of great benefit to the area for many years as there is no other sizeable safe play area in the site. My own family have enjoyed using this area over many years as have many other families and in recent years it has become an even more integral part of this neighbourhood. Families use it for picnics, playing with their children and children playing safely themselves as the houses facing the area (Burgage Court, Burgage Drive, Seaforth Road) can keep an eye on what is happening which is an asset for children's safety in this day and age. Furthermore I did not buy my house to have its value destroyed by having houses nose to tail at the front of my house and having my privacy shattered with houses backing into my livingroom window and also the peace in the area destroyed. There are 7 Trees situated in front of houses 10-16 Burgage Court, Tain which are classed as listed trees and are therefore protected so are unable to be removed. This fact does not seem to have been taken into account in your present plan. I am registering my views and hope they will be taken seriously and the fact the trees are protected will be reflected in future plans.

Allocated to	Tain	TN5	Knockbreck Road	
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Customer Number	01017	Name	Mr Leo Daly	Organisation	BKB Property
Agent Name amd Organisation (if applicable)		Administrator Yvonne Macdonald		G H Johnston Building Consultants	
Section	4.Development Allocations		Paragraph		
Reference	TN5		Type	Change	Comment Late
				No	

Comment Changes

1. Change the text to reflect the fact that the planning status of the land in our client’s ownership now has planning permission under 10/02217/PIP. 2. Indicate the fact that not all the land covered by the proposed TN5 allocation benefits from that permission or delete it from the plan. If the former the housing potential requires to be increased and the site area amended. 3. Add the tennis club, car park and land for expansion to the allocation as covered by the planning permission under 10/02217/PIP. 4. Include the former roads maintenance depot and Toll House to the south east of the Strawberry Field within this allocation and the SDA boundary. 5. Explain or delete reference to “avoidance of any adverse effect on the integrity of Dornoch Firth and Loch Fleet SPA/Ramsar through preparation of a Recreation Access Management Plan”.

Representation

We act for Mr Leo Daly who owns the largest proportion of the land allocated under TN5. Our initial comment is to support the inclusion of this land in the Proposed Plan and to confirm its availability. However, we have a number of comments about the extent of land covered by the allocation and question the need for additional assessments mentioned in the written statement over and above those already carried out in the process of recently securing the Planning Permission in Principle. The largest proportion of this land is covered by the permission granted under 10/02217/PIP for a mix of uses supported by a master plan. This permission was eventually issued on 22 October 2013 almost three years after Committee approval and following a protracted Section 75 Agreement process. The development of the Asda supermarket on adjoining land at Knockbreck Road has effectively opened up the development of TN5 initially to provide a significant amount of effective housing land. However, not all of the land included in the allocation benefits from permission granted under 10/02217/PIP. The land in question is in the ownership of the Bannerman and Baxter families, which is indicated on the attached plans including a copy of the Inset Map. It is therefore incorrect for the Plan to refer to “development in accordance with Permission in Principle 10/02217/PIP” for these areas. These will require to be the subject of a separate application for permission. The text of the Plan should reflect this or alternatively these areas of land should be separate allocations. The permission for 250 houses, business, commercial and community uses is therefore only confined to Mr Daly’s land. If the TN5 allocation is to cover this other land then the housing capacity will need to be increased beyond 250 house/flats. In other words any potential for residential development on the Bannerman and Baxter land should not be subtracted from the 250 permitted on our client’s land. The site area also needs to be amended if these areas not benefitting from planning permission are to continue to form part of the TN5 allocation. In addition, this allocation should also cover the tennis club, its car park and part of the Baxter land for its potential expansion, which did form part of the permission. We also question reference to “avoidance of any adverse effect on the integrity of Dornoch Firth and Loch Fleet SPA/Ramsar through preparation of a Recreation Access Management Plan”. This requirement was not included in the Planning Permission granted and there is no explanation anywhere else in the text of what a Recreation Access Management Plan is or entails. In the absence of such an explanation this requirement should be deleted from the text. The former roads maintenance depot and Toll House to the south east of the Strawberry Field was allocated as a business site in the adopted R&CELP (see attached extract from the adopted Plan). However, it is not allocated in the Proposed Plan and is indeed now located outside the Settlement Development Area with no explanation given in the report on MIR submissions of why this is omitted. As this site can be accessed from the superseded part of the A9, in the same way as the Strawberry Field part of TN5, we feel that this area should be added to the TN5 allocation and therefore re-included within the Settlement Development Area. To illustrate comments made the above we attach a single pdf file with the following plans: - (1) Copy of application site plan for 10/02217/PIP also indicating allocated land that does not benefit from this permission. (2) Main Land Uses and Overall Development Framework Plan from approved site Master Plan document indicating areas not benefitting from the planning permission. (3) Extract from the Proposed Plan Inset Map for Tain indicating (a) the areas not benefitting from the planning permission, (b) the former roads depot and Toll House land and (c) the tennis club land etc.

Allocated to	Tain	TN5	Knockbreck Road	
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Customer Number	00523	Name	Mrs Cerian Baldwin	Organisation	Scottish Environment Protection Agency
Agent Name amd Organisation (if applicable)					
Section	4.Development Allocations		Paragraph		
Reference	TN6		Type	Change	Comment Late
				No	

Comment Changes

We object unless the site has a developer requirement for a Flood Risk Assessment. This in order to ensure any prospective developers are full informed that the site is at flood risk and that the developable area may be affected.

Representation

We object unless the site has a developer requirement for a Flood Risk Assessment. This in order to ensure any prospective developers are full informed that the site is at flood risk and that the developable area may be affected.

Allocated to	Tain	TN6	Cemetery	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	TN7		Type	Change	Comment Late
				No	

Comment Changes

Access to good land

Representation

Mention should be made of access to the lower part which is in CGF ownership, and physically quite separate from the land above the escarpment . We would also ask the area of land between the railway line and beach to be brought into the Settlement Development Area.

Allocated to	Tain	TN7	Blarliath	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraph 4.80.	
Reference	Site Reference TN8.		Type	Change	Comment Late No

Comment Changes

“ To remove reference to ‘safeguard’ as it appears within the narrative which forms part of the text which relates to the allocation of Site TN8.”

Representation

Whilst it is considered to represent only a minor issue, concern is expressed as to the use of the term “safeguard” within the narrative, which forms part of the text, which relates to the allocation of Site TN8. The term safeguarding is most often taken to indicate that the land in question is being protected from inappropriate alternative uses, thus ensuring that at some point in the future, it will be available for its preferred use. This carries with it an implied suggestion that the land in question is not, or may not be, required for development at this time, hence the need to safeguard it so that it is available in the future. In light of my clients projected short term business requirements, it is likely that this land will be required for development much earlier than had been previously expected or anticipated. As a consequence of this, it is submitted that the Plan should make clear that Site TN8, the extent of which should be extended in line with the terms of Representation 1 above, is available for immediate development, should it be required by my client.

Allocated to	Tain	TN8	Glenmorangie	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraphs 4.76 – 4.83.	
Reference	Site Reference TN8.		Type	Change	Comment Late No

Comment Changes

“ To extend to area of land covered by this land use allocation in order to ensure that the short to medium terms development requirements relating to the continued expansion of the Glenmorangie Distillery are not inhibited in any way.”

Representation

The importance of my clients business is recognised within paragraph 4.80 of the Plan, where it acknowledged that this business is both a significant employer and a large tourist attraction. The requirement on the part of my client to extend the area covered by land allocation reference TN8, arises directly as a consequence of a recent review of their short terms expansion plans. As a result of this review, a number of planned developments, such as the provision of the additional warehousing and the improved access arrangements to the site, have been brought forward from their programmed implementation date as originally envisaged. The acceleration of these projects is in direct response to the continuing strong performance of the Scottish whisky industry within the global market place. The importance of the food and drink industry to the Plans Vision for the Ross-Shire Growth Area is set out at paragraph 3.10 of the Plan, where it is stated that by 2031, the economy of the are will have further diversified, with there being a renewed focus on food and drink manufacturing. In order to facilitate the continued development of my clients operations at Tain during the period to 2031, and hence to enable them to contribute towards the realisation of the overall Vision for this part of the plan area, it is vital that a sufficient supply of land, which can be brought forward immediately as and when required, is available to my client. The provisions of Scottish Planning Policy (SPP) are clear in terms of their support for economic development. At paragraph 45 of SPP, it is advised that planning authorities should respond to the diverse needs and locational requirements of different sectors of the overall economy and urges the adoption of a flexible approach to ensure that changing circumstances can be accommodated and new economic opportunities realised. Paragraph 45 of SPP further advises that: “Removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential.” It is respectfully submitted that when taken together, the various factors set out above provide sufficient justification for an increase to be made to the area of land which is available to my client, in both the short to medium term, for the further and continued expansion of their business interests. This will ensure, in line with the terms of SPP, that there are no unnecessary barriers put in place which could inhibit the continued growth of my clients business. To this end, it is submitted that the extent of area covered by land allocation TN8 should be extended to include the additional area of land highlighted on the plan, which is attached to and forms part of this Representation

Allocated to	Tain	TN8	Glenmorangie	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraphs 4.76 – 4.83.	
Reference	Site Reference TN8.		Type	Change	Comment Late No

Comment Changes

“ To extend to area of land covered by this land use allocation in order to ensure that the short to medium terms development requirements relating to the continued expansion of the Glenmorangie Distillery are not inhibited in any way.”

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Allocated to	Tain	TN8	Glenmorangie	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraphs 4.80 – 4.81.	
Reference	Site Reference Tain Inset Map (page 93).		Type	Change	Comment Late
				No	

Comment Changes

“ The identification and allocation of land lying to the west side of the A9, to the immediate west of the land presently occupied by them, for the purposes of safeguarding land to accommodate their long term development/expansion requirements.”

Representation

The requirement on the part of my client to have an area identified and allocated to take account of their long term development/expansion requirements arises as a direct result of the present and ongoing development of their facility, which is advancing at a pace that hitherto had been unexpected. As a consequence of the this level of ongoing activity, it is likely that the land presently allocated to accommodate the expansion of the site will be utilised within the short to medium term, and that accordingly, no land will remain which is able to accommodate the longer term development requirements of the business. My client controls an area of land lying to the west side of the A9, as identified on the plan, which is attached to and forms part of this Representation. Although this land lies on the west side of the A9, the settlement of Tain has already seen development take place on the west side of the A9, with it being noted that further residential development is planned to take place on the west side of the road through the allocation of Site TN4. Through the proper master planning, landscaping and design of this area, it is submitted that it will be possible to successfully bring it forward for development without giving rise to any adverse environmental or landscape impacts. Whilst this suggested long term land allocation is not required for development at this time, and can be identified only as a long term development site within the terms of the Plan without it actually being made available for development, there are significant benefits to be gained from formally identifying the future development potential of the site at this stage. Most notably, by confirming the future development potential of this site it will provide a high degree of certainty as regards the future of the land. By confirming and making clear the long term future of the site, it will be possible to provide my client with the level of certainty and confidence that is required to enable them to take forward the preparation and implementation of advanced programme of landscaping and site infrastructure works. The implementation of advanced landscape works, well in advance of the actual construction of the development to which they relate, is of particular relevance and importance to environmentally sensitive locations and can assist significantly in ensuring the successful assimilation and integration of the development into the surrounding countryside. For the reasons set out above, it is respectfully submitted that the land identified on the plan attached to this representation should be identified as a site for the long term expansion of the Glenmorangie Distillery.

Allocated to	Tain	TN8	Glenmorangie	
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Customer Number	00322	Name	David MacDonald	Organisation	The Royal Burgh of Tain Community Council
Agent Name amd Organisation (if applicable)					
Section	Development Allocations		Paragraph		
Reference	TN8		Type	Change	Comment Late
				No	

Comment Changes

Access Improvements

Representation

Clear boundaries for future development are required to reflect known projected development. An overall Master Plan would be a good idea. It should include measures to improve significantly the safety of the A9 access junction, a suggestion recently made by the Community Council but ignored by both developer and planning authority.

Allocated to	Tain	TN8	Glenmorangie	
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Customer Number	04429	Name	Peter Nelson	Organisation	The Glenmorangie Company
Agent Name amd Organisation (if applicable)		Andrew Bennie		Bidwells	
Section	4.Development Allocations		Paragraph	Paragraph 4.80.	
Reference	Site Reference TN8.		Type	Change	Comment Late
				No	

Comment Changes

“ To remove reference to ‘safeguard’ as it appears within the narrative which forms part of the text which relates to the allocation of Site TN8.”

Representation

Whilst it is considered to represent only a minor issue, concern is expressed as to the use of the term “safeguard” within the narrative, which forms part of the text, which relates to the allocation of Site TN8. The term safeguarding is most often taken to indicate that the land in question is being protected from inappropriate alternative uses, thus ensuring that at some point in the future, it will be available for its preferred use. This carries with it an implied suggestion that the land in question is not, or may not be, required for development at this time, hence the need to safeguard it so that it is available in the future. In light of my clients projected short term business requirements, it is likely that this land will be required for development much earlier than had been previously expected or anticipated. As a consequence of this, it is submitted that the Plan should make clear that Site TN8, the extent of which should be extended in line with the terms of Representation 1 above, is available for immediate development, should it be required by my client.

Allocated to	Tain	TN8	Glenmorangie	
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