



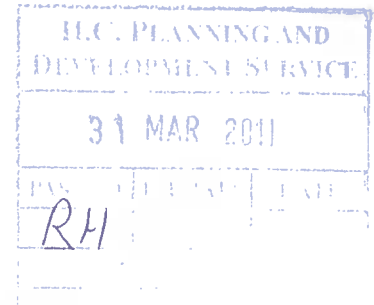
Nairn River Community Council

Hon. Secretary:

Chairman: Mrs. J. Tolmie
Kogarah
Gordon Street
Nairn, IV12 4DQ

30 March 2011

Mr Richard Hartland
Head of Planning & Building Standards
The Highland Council
Glenurquhart Road
INVERNESS
IV3 5NX



Dear Mr Hartland

APPLICATION NO: 11/00686/FUL
PROPOSAL: Residential Development consisting of 319 Units at Cawdor Road, Nairn South, Nairn
APPLICANT: Scotia Homes (North) Ltd, BDW East Scotland Ltd & Robertson Homes Ltd

The Nairn River Community Council, as the Statutory Consultees, wishes to submit the following objection and comments on the above application.

1. The application is for the construction of 319 housing units on 32.75 acres of prime agricultural land at a time of increasing worldwide food shortages, resulting in soaring food prices and also social unrest in many parts of the world. It is unwise, irresponsible and against the public interest to destroy good agricultural land simply to provide profits to landowners and property developers.

The development of this site seems to be in contravention of the Scottish Planning Policy Document (clause 97 on page 20): –

“Prime agricultural land is a finite national resource. Development on agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need – where no other site is available. Small scale development directly linked to local businesses, including housing may also be permitted. When forming the settlement strategy, planning authorities should consider the impact of the various options on prime agricultural land and seek to minimise its loss.”

The Highland Wide Development Plan for Nairn South stipulates that the first phase will be strictly limited to 250 houses. The developers think otherwise.

The Planning Committee are reminded of the advice given to The Highland Council in 2006 by Halcrow Consultants: –

"It is essential that the opportunity for economic development in Nairn matches the overall aspiration for growth. There should be a clear balance between population growth and economic growth over the long term."

The density of the proposed development at a level of 9.745 dwellings per acre is wholly excessive and inappropriate in a rural area.

The density and size of individual properties are small and cramped. The individual drawings indicate that a 2/3 person dwelling has an internal area of 67 square metres compared to a typical dwelling for 2/3 persons in the UK through the 50s, 60s and 70s would be in excess of 100 square metres. The design of this proposal for dense urban development does not reflect the past 10 or more years in the rural area south of Nairn. The design of 319 units consisting of 2, 2.5 and 3 storey constructions with roof lines of 9.6 m to 12.2 m is greater than any other similar properties in the area. The designs of the flats show a 2 bedroom 3 person unit with 1 WC and a 3 bedroom 5 person unit with 1 WC.

2. There is no justification for such a dense development in Nairn. There is unfinished development at Lochloy which has an affordable element to it. The proposals for the Sandown area are unresolved. The large Albyn Housing development at Riverside has units available. The recent collapse of a contractor involved at Lochloy suggests a lack of demand. The various residential developments along the Cawdor Road over the years have been individual houses except for some opposite the hospital and those at Rhuallan and Firhall. At the latter, The Highland Council gave planning approval for an environment for people of middle age and older based on an open landscape. There are 93 properties on 31 acres of former gardens to Firhall House. Rhuallan Grove has just 6 houses.

3. Gordon's Timber Yard

As a major employer in Nairn of more than 100 people, who have traded here for 100 years, it is important to consider their needs. At a time of general decline it is important to safeguard jobs in the area. It is not feasible to consider the company moving to another site as may have been suggested. The company wishes to grow and has already had planning permission to extend their premises. Currently over £1 million is being spent on a new drying plant. Development at Nairn South must allow the sawmill sufficient land to grow and adapt to a sustainable future and to deliver the strategy set out in the local plan. Also, it needs a buffer and breathing space between their operations and any future development in Nairn South.

This should be a high quality amenity area containing a shelter belt of woodland which should provide public access, wildlife and bio-diversity. The increasing transport demands of the company, which presently brings 300,000 tonnes of wood fibre per annum into and out of the plant, needs carefully thought out.

4. Traffic

The plans show four road junctions with the B9090 Cawdor Road and two with the B9091 Balblair Road. With 761 parking spaces and 63 garages, of which 24 are for two cars, there will clearly be a vast increase in the amount of traffic.

There has already been an increase since the opening of the new Town & County Hospital and Primary Care Centre with its full range of activities. There is close to 100 parking spaces there and most of the traffic goes under the railway bridge. There are

three care homes on Cawdor Road generating traffic. Claims that construction traffic can use the existing road structure are unrealistic.

The proposed so called improvements to Cawdor Road, which are actually more restrictions (speed bumps and traffic lights), do not address the problem of the narrow railway bridge.

The railway bridge and the junction of B9090 and B9091 are described as "pinch points" which is misleading. The road width is barely adequate for the present traffic. The height at the centre of the bridge is 3.8 metres and large vehicles have to move to the centre to get through. If the footpath is widened as suggested it becomes even more difficult for vehicles.

It is well established that there is a need for a bypass to Nairn but any proposals for that to happen will be long after the increases in vehicle movement created by this proposed development.

5. Drainage and Services

It is stated that all properties will be connected to the existing public water and sewage facilities in or near Cawdor Road. There is no information from Scottish Water that their systems can handle a major increase in demand. The same question applies to the provision of gas/electricity supplies.

The site lies on a slope and, in times of heavy rainfall, standing water can be seen accumulating at the bottom of the field next to the Cawdor Road. Covering the area with buildings will exacerbate the problem. The application does not deal with maintenance and repair of the so called SUDS areas after the developers leave the site, nor the capacity of the main sewer to cope with the outfall from the site.

6. There is no mention of any consultation with SNH under the Wildlife & Countryside Act regarding protected species of birds of which there are many in the area, as well as badgers, deer and red squirrels. An area in the north west of the site has some significant link with Culloden.
7. This planning application is heavily influenced by the Enquiry by Design Approach advocated by the Prince's Foundation for the Built Environment. It also involves Urban Design Associates of Pittsburgh USA, the President/Chief Executive of which is a member and donor to the Foundation. In the Landscape and Visual Impact Report it states that this location is suburban housing! The area is outside the Nairn boundary.

We feel that this application should be rejected as there is no need for such a dense development in Nairn at the present time. There is no evidence whatsoever of demand for these houses. The developers have provided no viable solutions to the traffic problems on Cawdor Road.

Development on this site should not go ahead until there is a Nairn bypass and other infrastructure improvements.

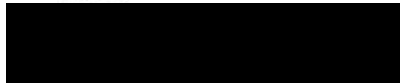
It is unrealistic to assume that the developers will provide sufficient funds to meet the large capital expenditure required to address the constraints that the current road and rail present.

The large amount of documentation submitted in the public consultations were seen by a very small number of people, most of whom would seem to be unlikely to purchase one of the properties.

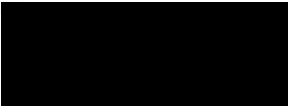
Finally, we come to the latest development in the Nairn South area – the prospective further plans for the whole of the area to Howford Bridge. It would be premature to grant this planning application without looking at the proposed wider plans which means many more houses. Further comments will be made at a later date should the need arise.

We ask the Committee to reject the application.

Yours sincerely



JEANNE TOLMIE (MRS)
Chairman – Nairn River Community Council





Nairn West Community Council

H.C. PLANNING AND DEVELOPMENT SERVICE		
15 APR 2011		
PASS TO	INITIALS	DATE
RH		

Chair: Rosemary Young OBE

Inveran Lodge

Seafield Street

Nairn IV12 4HG

9th April 2011

Richard Hartland
Head of Planning and Building Standards
Highland Council
Glenurquhart Road
Inverness IV3 5NX

Dear Mr Hartland,

APPLICATION: 11/00686/FUL
PROPOSAL: Residential development of 319 units etc at Nairn South
APPLICANTS: Scotia Homes, BDW East Scotland, and Robertson Homes

Comments were initially invited on this application by a deadline of 24 March, but we understand the date for responses has now been extended to 19 April.

The area directly affected by the first stage of the proposed development is largely within the current boundary of Nairn River CC, and possible subsequent development will extend into Cawdor and West Nairnshire CC. Council planning officials and the developers have however recognised that the proposal will have significant implications for the whole town of Nairn and all its residents, and it is on that basis that Nairn West CC has considered the application and is submitting comments below concluding that the Application should not be approved.

I. General comments: procedure

We welcomed, and have attended, the sequence of local consultation meetings organised by the developers and their advisers. We believe that this process has helped the developers to understand the practical issues, and the concerns and interests of local residents, and we recognise the efforts that the developers have made to adapt their plans accordingly.

We also welcome the developers' readiness to link their planning for Nairn South to the future evolution of the town centre and the rest of the town.

That said, we have a number of concerns about the development of this site which arise irrespective of the detailed plans of this or indeed any other developer. We believe that no plan for Nairn South is likely to be acceptable unless or until some of the other planning

issues related to that area are reviewed and addressed satisfactorily. These issues are mentioned in the detailed comments below.

II. General comments: land use

The site is currently prime agricultural land. We strongly agree with Nairn River CC that the zoning of this area for housing is fundamentally inappropriate and does not accord with the principles set out in national planning policy and guidance. This objection arises in respect of any application to build on this land. Given our doubts (see below) about housing need, and our other concerns about the infrastructure and access implications, we consider that there is a compelling case for review of the designation of this land for housing, and that there is a strong case for its preservation as green space and productive farmland.

III. Housing need, numbers, and density

We do not accept that a substantial number of new housing units is required or justified on this site in Nairn. We believe the development application is based on ambitious and unrealistically high projections made in plans some years ago, that were ill-founded and are now out-of-date. The numbers, and indicative build-rate, of new housing envisaged for the area in and around Nairn in the new draft Highland-wide Local Development Plan have already been scaled back from the aspirational figures cited in the A96 Corridor Framework. This reinforces the case for a review and reduction in the number of units (if any) to be permitted on this specific site.

I wish to emphasise that we are not opposed to the construction of additional housing in suitable locations in and around Nairn. But we strongly believe that the rate of housing growth should be realistic, proportionate, and linked to the capacity of the town's facilities, services and infrastructure

If housing is to be built, we think that the numbers and density (319 units in this – initial – phase) is unacceptably high. We recognise the merit of the developers' thesis that in certain contexts a more dense and concentrated "urban" form and layout is preferable to the "suburban sprawl" that is evident in many other recent housing-estate developments. But we note that this application does not include provision for the kind of neighbourhood facilities, shared spaces, retail premises, commercial and mixed-use provision in the northern part of the site which – at the consultation stage – was the rationale for the more urban configuration. The present application indicates dense housing without the earlier mixed-use zones outlined at the design stage.

In specific design terms, we regard it as ill-judged and unrealistic, even if housing were to be built on this site, for the plans to omit provision for adequate off-street and garaged parking. Despite the broad policy objective of modal shift and greater use of public transport, the Highland Council's own transport strategy recognises that, in this largely rural region ill-served by public transport networks, the private car will inevitably continue to be the principal mode of transport. To build dense housing with minimal parking provision will simply generate substantial difficulties of on-street parking, with resulting congestion and safety issues. The development plans for this site – if it is to be predominantly housing – must have fewer houses and more provision of garages and parking as integral elements of the design and layout.

IV. Drainage and services

There are already serious and unresolved questions about the capacity of the existing waste water and treatment facilities in Nairn, and concerns about the adequacy of measures to protect the river. The river (and the harbour and beach) are important environmental and recreational resources. We are not satisfied that the impact of this proposed new development has been adequately and proactively considered by the relevant authorities. We believe a residential development on the scale envisaged will impose unsustainable additional demands, and thus do not support it.

V. Access, transport and traffic

It is fundamentally wrong to permit development in this area of Nairn without first addressing and resolving the major transport constraints. If developed as housing, residents will inevitably wish to access the services of the town centre and also travel to other destinations. In the absence of a bypass, and indeed even if or when one is built,

- (i) the Cawdor Road does not have the capacity to bear the additional flow in either direction (into town or outward to elsewhere) that a housing development this size would generate;
- (ii) there are very few options for alternative access and egress to and from the site, given the "obstacle" of the railway;
- (iii) most serious of all, the development application offers no adequate solution to the difficulty of the bottleneck at the current narrow-arch bridge under the railway by the station. Neither traffic lights nor physical constrictions will alleviate the situation – indeed such measures represent additional restrictions. This will exacerbate congestion and provoke more diversion through residential side roads (e.g. Mill Road). It will also put at risk safe and prompt access to the hospital.

None of these problems are specific to this developer. They apply to any proposal for the site. None can be dealt with by the imposition of planning-conditions. Significant change to the Cawdor Road/railway arch underpass would involve major infrastructural works that cannot be delivered as an adjunct to a single commercial development. Given that the zoning of this area for development was predicated on the construction of a bypass, it seems obvious that any such development should not proceed until the bypass, and the ancillary works associated with it, are a great deal further advanced.

VI. Compatibility with neighbours: retirement village and sawmill

The impact of a major new housing development on ease of access to the hospital has been mentioned above. There are two other compatibility problems. The adjacent Firhall development is a low-density residential site with a high proportion of green and open space, entirely appropriate to a peripheral area of town where there is a transition from built-up area to local open countryside. An intensive zone of urban-style housing, as indicated in this application, for this very similar edge-of-town site would represent a significant change of character and a much harsher transition which would detract from the present attractive visual and environmental appearance of the area.

The other question relates to the existing sawmill as the major employer in the area. It is debatable whether in broad planning terms it is desirable or sensible in the long term to locate new homes close to an industrial process which unavoidably generates noise and other environmental/atmospheric consequences. But the sawmill is already in place, long-established and provides vital local employment. It follows that adequate steps have to be taken in the planning process to enable continued access to this industrial operation (which

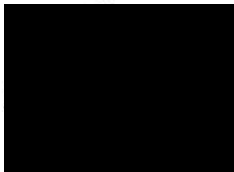
means proper provision for safe road access for the large timber lorries), and for minimal disturbance to other people or activities in the area.

Had the applicant sought – as in earlier design discussions – to devote substantially more of the northern part of the site to a buffer zone, and to locate mixed-use premises (business or commercial) in that northern part, this would have been easier to reconcile with the existing presence of the sawmill and timber yard. At present there is a serious incompatibility between the needs and aspirations of the industrial operation, and the developers' application for a substantial new residential housing estate. For the sawmill to remain and to expand, this raises the question of whether the Nairn South site should not be more appropriately designated for other non-residential (e.g. business, or light industrial) uses which would have less need of town centre access and could use an upgraded Balblair Road as a dedicated service route.

VII. Conclusion

The problems of transport and access, and the issue of compatibility with neighbours, indicate clearly that the basic planning framework is misconceived. To permit this particular application to proceed without addressing, and resolving, these wider problems will simply make a difficult situation virtually impossible and have a detrimental effect on the town.

As matters stand, the adverse consequences of this proposed development for the immediate area and for the town as a whole will far outweigh any presumed benefit. For that reason, Nairn West CC believes the application in its present form should not be approved.



Nairn West Community Council

c.c. All NAIRN COMM COUNCILS



e-mail~nairnsuburban@aol.com

Chairman~ Harold Thompson
Secretary~ John A. Mackie Esq. B.E.M
Treasurer~ Richard W. Youngson

Working in our Local Community

17th. March 2011.

Richard Hartland,
Head of Planning & Building Standards & Planning,

Dear Mr. Hartland,

Planning Application No. 11/00686/FUL/GOMO/OAA.

Residential Development consisting of 232 Houses and 87 Flats (319units) at Nairn South, Lochdhu Farm.

Thank you for your letter of 10th. March 2011 with the enclosed Application and associated disk.

Nairn Suburban Community Council wish to make the following **OBSERVATIONS** in respect of the above Planning Application: - We have been closely associated with this proposal for a number of years and have been part of its evolution.

We can support the layout and design of individual houses and flats. The location has been agreed in the long term development of Nairn. The site has been nicely landscaped and demonstrates good community layout in relation to built development, roads, pathways and vistas in a prominent site on the southern approaches to Nairn and close to the river Nairn.

With a large number of flats (87) we would ask for a number of groups of Allotments to be skilfully included in the green landscaped design. We would suggest a total of 30 plots, each of 100m² and some could be subdivided to form smaller units. The Nairn Allotment Society would manage them on a long term lease or agreement and be responsible for letting, tenant's agreements and maintaining statutory waiting lists. We have raised this issue with Stephen Pirie of Mike Gilmour Associates and they will discuss with the developers.

Road access into Nairn via Cawdor Road is going to be difficult with pinch point at the Railway Bridge. The proposed Nairn Bypass crossing the River Nairn at Howford will take some of the pressure off, so every effort must be made to keep the Bypass as a high priority in discussions with Ministers and MSP's.

We will be discussing this proposed development at our monthly meeting on Tuesday 29th. March 2011 and we may have further comments to add.

Yours Sincerely,

Richard W. Youngson.



Chairman/Secretary
Margaret Robertson

Treasurer
Fred Treadgold

Community Councillors

David Vaughan
Derek Hamilton
Doug Piggott
George McConachie

13th April, 2011

Dear Mr Hartland,

Your Ref: 11/00686/FUL/GOMO/OAA

Residential Development of 319 units and associated infrastructure and public open space, land at Cawdor Road, Nairn South, Nairn.

Thank you for providing details of the above-referenced application. Cawdor & West Nairnshire Community Council would like the following points to be taken into account when this application is considered.

- It is to be welcomed that the new development will be located near to the proposed Nairn By-pass.
- It is considered desirable that the activities of the existing Gordons Sawmill are not compromised by the proposed development.
- Improvements in the road network/infrastructure will be required to accommodate the increase in vehicular traffic. Of concern is the Cawdor Road under the relatively narrow Railway Bridge, particularly when being used by large vehicles. Rural roads leading from the development to the A96 will also require to be upgraded.
- In the event that it is not economically viable to construct the development in its entirety, conditions should be put in place to safeguard the attractive appearance of the area as one of the approaches to Nairn.

Yours sincerely

R Margaret Robertson, Chairman
Newton House, Newton of Cawdor, Nairn, IV12 5RA