

## **Nairn West and Suburban Community Council Comments on Proposed IMFLDP**

**31<sup>st</sup> May 2022.**

### **Introduction**

We welcome the opportunity to comment on the proposed IMFLDP, but reiterate our firm view that planning should be based on the framework now adopted by the Scottish Government for community led Local Place Plans, rather than the obsolete format still being used by Highland Council in the dying days of the old Planning Act. We fully intend to continue to push for a Local Place Plan to be produced by our community, and welcome the help that has been offered by Highland Council to get this process funded and started. In the absence of a Local Place Plan and in the spirit of more localised influence on planning strategies, we are encouraged by the councillors' assurances at the recent public meeting that local feedback in the consultation process will be taken into consideration for the final plan.

### **Vision and Outcomes**

We completely support the IMFLDP's vision for the future of the Inner Moray Firth Area.

- Nairn's wonderful natural environment must be safeguarded and enhanced with recycling of buildings and land to achieve a carbon clever community and preserve quality farmland.
- More high quality local employment must be created to reduce commuting and support other local businesses.
- Nairn must have an equal share of resources to other centres with a thriving town centre and a full range of its own services and facilities with locally based staff.
- Highland Council should lead on this by a policy of localism and devolving jobs back from Inverness.
- Connectivity must include a commitment to an early Nairn by pass, as the traffic congestion around and through Nairn makes getting around town very difficult and active travel options dangerous.
- If Nairn is to be considered a growing community then there must be an 'Infrastructure First' approach prior to any more growth. The delivery and enhancement of public services to meet requirements of existing residents must be prioritised.

### **Spatial Strategy.**

'The Plan intends to direct most future growth to the settlements with the best existing, committed or likely viable future access (via sustainable travel choices) to the community facilities, infrastructure, employment and other commercial opportunities, and environmental capacity necessary to support that growth.' 'If future development is to be economically viable and environmentally sustainable then it must be capable of being supported by adequate capacity in local infrastructure networks and community facilities.'

Nairn has been chosen as a 'Growing Community'. However using the definition above, there is a serious problem with road congestion, schools, community facilities, infrastructure, employment opportunities and environmental capacity. Infrastructure has to come first. Much of Nairn's existing employment depends on tourism and the quality of Nairn's environment, so great care has to be taken that existing diversity of the local economy and services is not compromised by unsympathetic development or 'commuter belt' housing.

### **Housing Needs Assessment.**

Having looked at the HNSA 2020 process we are not convinced that housing needs in Nairn are as stated

- HNSA uses the high migration population projection when we are on a very low trajectory.
- There appear to be areas of double counting of waiting lists.
- Flexibility of 30% extra has been added for reasons that are unclear.

While we have sympathy with those who are waiting for a house, repurposing older buildings seems to be a much more environmentally suitable option in the current climate.

By 2030 the Highland household numbers are projected to be static, so it is not clear why there is so much being built.

### **Sustainable Tourism**

Nairn has now been recognised in the plan as one of Highland's main tourist venues, but over the last few years there has been very little investment in improving Nairn's tourist offering. The current funding streams seem to have been directed largely at NC500 communities, and Nairn has lost out.

If tourism is to be sustainable, then towns such as Nairn, where people stay for a few days and enjoy the environment and local activities, must be equally promoted and assisted by bodies such as HIE to prevent the overtourism and climate negative travel patterns of the NC500.

### **General Policies:**

#### **Environment:** We support:

- protecting the environment, particularly the River Nairn, Moray Firth and local wildlife.
- protecting greenspace and green networks and investing in many more trails around Nairn.
- provision of fully functional modern sewage and water systems with no pollution of water courses or sea.
- We are concerned at the planned destruction of the Whiteness spit with its Ramsar SSI1 designation and the effect on seals, dolphins and bird colonies.

#### **Employment**

- Must have investment in local businesses and industrial estates so people can work locally.
- Nairn's tourist industry depends on its wonderful environment. Looking after this is crucial, and poor infrastructure seriously jeopardises this industry.
- We endorse the support set out in the Ardersier section of the plan for delivery/completion of the Moray Firth Coastal Trail. This is a regional tourism and recreational project of significance to the wider Highlands and as a link between Inverness, the Great Glen, the NC500 and the Moray coast to the east. It merits greater priority in the IMFLDP. It is as important for Nairn as for Ardersier and thus deserves mention also in the Nairn section.

**Industrial and Business land** zones must be extended and protected : Balblair, Grigorhill and Balmakeith should all provide scope for expansion and more businesses attracted by funding opportunities.

Both Forres and Inverness have Enterprise Zone status which is a huge financial advantage. Nairn must also be given this.

#### **Town Centre First.**

We wholeheartedly support people living and working locally with the refurbishment of older town centre buildings.

The proposed plan should identify this as an explicit objective.

There should be no more out of town retail in Nairn. Parking should remain free and there should be no more piecemeal one off building on the town's central car parks or green open spaces.

#### **Port of Ardersier**

While we welcome the prospect of employment again at the Port of Ardersier, we are concerned at some of the proposed uses that have been put forward recently in the press.

- We would certainly not support major polluting activities just upwind of Nairn and its beaches and golf courses. These polluting activities proposed include a waste incinerator and a steel mill.  
Our tourist jobs and indeed our own health depends on a green and healthy environment.

#### **Nairn Vision**

We fully support Placemaking Policies 27 for Nairn, and very much hope that funding and manpower will be made available to carry this out. Local Place Planning must take place, to focus on what the community's vision is for Nairn, its wants and needs.

#### **Infrastructure**

As discussed in 'Growing Communities', Nairn's infrastructure is a very major problem and it is completely unfit for purpose in many respects.

- The A96 traffic is causing major congestion, serious accidents, business losses, pollution, dangerous active travel and loss of the seaside ambience which tourists previously enjoyed. Adding more local users just now is unacceptable. There is at present no capital allocated to the by pass, so it may not be built for many years. The rural roads are used as rat runs meaning there is danger to cyclists and runners/walkers.
- Scottish Water's assessments are that Nairn's network of sewers will be on red alert if there is more development and in fact some areas of the town are already in the red zone. The sewage works are projected to need significantly increased storage space. The combined surface water and sewer discharge causes backing up the drains in heavy rain,

overflows into the river and beach awards have been lost. This must be sorted. Lochloy sewage is a disgrace, and instils absolutely no confidence in officials' power to sort things out once built.

- Nairn's water supply is at very low pressure in parts of the town, and can only get worse with more demand.
- Primary schools are very near full capacity and both are well over 100 years old. Nairn Academy is being replaced.

**Infrastructure First** is the mantra of the plan, and Nairn must have its infrastructure sorted in the very near future.

### **Housing.**

NWSCC does not oppose planning for some additional new housing, but essential infrastructure **MUST** be built and developed before more housing takes place. The issues of the A96 by pass, sewage infrastructure, water supplies, schools, health and social services and flood protection all need to be addressed in the very near future.

Housing numbers must be proportionate to the quite small projected increase in the population. We cannot accept that all those who wish to move from other communities because Nairn seems more attractive should be catered for, creating uattractive sprawl they may be trying to escape.

Nairn's role is as a tourist destination and service-provider to the surrounding area. It is not, and should not become a dormitory town full of commuters who are adding to climate change. The town's future should be as a 20 minute town full of local jobs and amenities with infrastructure to match, and our prime agricultural land and open spaces fully protected.

### **Delnies**

The Delnies application was first submitted in 2008 to include extensive leisure facilities. These were the major factor in gaining planning permission. Cawdor Estates have now been given two lengthy renewals of permission and nothing has been built. It has now been recognised by Council officials that development of that site (especially for housing alone), separate and detached from the town, would be inappropriate.

It now appears that the housing section of the land is being marketed 'with permission for 300 houses'.

We query whether planning permission for only a small part of the scheme can be passed on in this way.

- We object to any building of houses on this land in the absence of the rest of the facilities which gained it planning permission.
- We also query whether there is appropriate water and sewage infrastructure and who will pay for it.
- Any more traffic at this part of the A96 before the by pass is in place is unacceptable.
- A completely car dependent development on agricultural land outwith the town is not appropriate either in policy or climate terms.

We consider that the allocation of Delnies as a development site in the proposed plan is unacceptable.

### **Sandown**

This land is inalienable common good land and a very well supported consultation in 2021 voted 97% against sale of the land to a developer or the handing over of decision making powers to Highland Council.

The land has belonged to Nairn Burgh residents since 1589 and it is they who should decide what use is made of the land. The community consultation held in 2012 is completely outdated.

- Nairn community bodies and residents must be the decision makers here.
- Some housing may be appropriate but only as decided by the community to tie in with other possible uses.
- Now is absolutely not the time to be selling land for a fraction of its value in a time of economic crisis.
- Land which is appropriate for community leisure uses, wetlands and parkland must not be given up to any developer.
- All options must be looked at including leasing/business uses/community purchase/selling of plots/new academy site/sports pitches/renewable energy/hotel etc. All these would retain the land for the community.
- Infrastructure for roads (by pass), water, education and especially sewage must be in place first and in particular not charged against Nairn Common Good Fund.

### **Town Centre**

Current policy supports the regeneration of town centres and having many more people living centrally and using local high streets. '20 minute towns'.

- We are very much in support of regeneration of disused and run down property for residential uses, especially the very many upper floors above shops. This is being done in Inverness and Moray. 60% of the housing waiting list wish 1 bed town centre properties, so refurbishing older buildings is clearly a priority.
- We oppose any more built development in central car parking space. Adequate and adjacent parking is essential for High Street access, especially when we have a large elderly population and a wide rural hinterland.
- Parking should remain free of charge.
- We wish the Library to remain in the town centre and disused public buildings renovated and used productively.
- The Library site must be taken into local control as soon as possible to retain the 70 parking spaces.

### **Nairn Showfield**

This is a very valued green space in the centre of town and is increasingly used for football with the expansion of St. Ninian's FC to include womens' football.

Apart from the possibility of only a small ineffective area remaining for sports, there are access problems to the field both from Lodgehill Road and A96. We would not be in favour of using this sports ground for housing and indeed Government policy now mitigates against building on sports fields.

### **Nairn South**

The infrastructure problems of this site were found to be very major.

- We would not support development here unless the infrastructure was in place first.
- This development is completely hamstrung by the Railway Bridge on Cawdor Road.
- Necessary road improvements before any development starts at Nairn South are estimated at over £4 million
- Sewage infrastructure would depend on major expenditure to separate surface water and sewage all the way to the sewage works.

### **Nairn East**

While housing development in this area would balance up the town north and south of the railway, major industrial businesses sit in the middle of the proposed housing plan, and we are very concerned that any housing built as per the plan would not only limit expansion of business use but also be subject to noise, dust and heavy vehicle dangers. It is conceivable that in the longer term, subject to the delivery of the A96 bypass, the consequent reconfiguration of access routes, the upgrading of power, water-supply, drainage and sewage networks, and the implementation of flood prevention measures, that some housing development in this area might eventually be possible. But this is not a realistic prospect in the next 5-10 years, the lifetime of this plan. The fact that major and well-established industrial businesses which are key employers and contributors to the town's economy sit in the middle of this area render any proposal for housing or mixed use ill judged at present .

- We fully support the concerns of industrial occupants of Grigorhill Business Park
- Nairn is short of employment, and we should not jeopardise that.
- Infrastructure such as the by pass, flood prevention, access improvements and sewage upgrading are critical to any development on this site.
- All these considerations lead to the conclusion that this is not a viable site for development, other than the expansion of the industrial/business zone, during the lifetime of this plan and before the A96 bypass is completed.

### **Appendices: IMFLDP Delivery Plan**

We are very unhappy with the proposal to allocate all leisure and recreation developer contributions from housing across Nairnshire to High Life Highland's 'Dance Studio' at the Nairn Leisure Centre. There has been no needs assessment or consultation with any communities in the whole IMFLDP area about allocating all their DCs to often distant HLH facilities and it is contrary to HC policy, which states that community developer contributions will not normally be allocated to one specific project.

This needs to go back to the drawing board and communities given the opportunity to bid for the money for their own priorities in their own communities as is done in Moray.