

## Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	<b>HWLDP-MIR-204</b>
Organisation/Individual:	Pritchett Planning Consultancy – Kilmartin Property Group

**Action:**

Immediate Response Required	<input checked="" type="checkbox"/>
Meeting required with Respondent	<input type="checkbox"/>
Issue for Area Local Development Plan	<input checked="" type="checkbox"/>
Further Information Required	<input type="checkbox"/>
Other (Please Specify)	<input type="checkbox"/>

*If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.*

**Issues Raised in Response:**

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	
Inverness and A96	<input checked="" type="checkbox"/>
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	
Natural, Built and Cultural Heritage	

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	
Accessibility and Transport	<input checked="" type="checkbox"/>
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	
Forestry and Woodland	
Minerals	
Open Space and Physical Activity	
Access to the Outdoors	
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

**Key:**

Background	Spatial Strategy	Policy Options	Consultation
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**Notes:**

Disappointing lack of emphasis on current issues affecting Inverness  
 Recommends that the Council assess the capacity of existing land within the settlement boundary which can be developed for land uses which are needed over the course of the DP period, before further land is allocated  
 Lack of detail on unstrained infrastructure in Inshes area – add to Inner Moray Firth LDP database

Action Sheet Completed by:	GW
Date:	09/12/09

**Dawn Sutherland**

**From:** Phil Pritchett [redacted]  
**Sent:** 09 November 2009 09:44  
**To:** devplans  
**Subject:** Highland Wide Local Development Plan: Main Issues Report, Comments on Behalf of Kilmartin Property Group

Please find attached a document consisting of the comments on behalf of Kilmartin Property Group in respect of the above. A hard copy is being issued in the post. We would be grateful if you could keep us informed as the development plan process progresses.

Regards

**Phil Pritchett**  
Pritchett Planning Consultancy  
PO Box 8052  
Edinburgh, EH16 5ZF  
Tel: [redacted]  
Mob: [redacted]  
email: [redacted]

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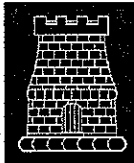
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**HIGHLAND WIDE LOCAL DEVELOPMENT PLAN  
MAIN ISSUES REPORT  
COMMENTS**

**ON BEHALF OF  
KILMARTIN PROPERTY GROUP**



**Pritchett Planning Consultancy Ltd  
PO Box 8052  
Edinburgh  
EH16 5ZF**

**Tel:** [REDACTED]

**Fax:** [REDACTED]

**Email:** [REDACTED]

## 1.0 INTRODUCTION

- 1.1 Kilmartin Property Group (KPG) owns land and commercial property in the Inshes area of Inverness (including Inshes Retail Park) and has been involved in the consultation processes in respect of the Trunk Link Road for the last two to three years. The company has previously achieved planning permission for a significant amount additional retail floorspace within the Inshes area. Kilmartin has also been working with council officers to seek ways in which the existing road infrastructure in the Inshes area can be upgraded in order to allow the aspirations of the council within the wider Inverness area to be fulfilled. KPG's firm view is that until such a time as the issues surrounding accessibility and road infrastructure provision in the Inshes area have been properly tackled and solutions formulated and implemented, then the A96 corridor framework and expansion of the city in an easterly direction cannot be fulfilled.
- 1.2 The new local development plan must therefore tackle existing issues within the city before wider expansion aspirations are considered. Otherwise, and as has happened previously in the city and in particular at the western end of the TLR, much needed infrastructure provision is not provided and the growth of the city becomes disjointed and adhoc. This development plan process must therefore focus on the issues which have been identified by the council and solutions must be found and implemented. The Inshes infrastructure improvements must form a major part of the council's approach to growth to the east of the city.
- 1.3 Kilmartin is disappointed at the lack of emphasis in the plan on the issues facing the city now and how the council and other stakeholders should address these longstanding issues which have already been identified but where solutions are yet to be properly formulated and implemented. The plan must therefore be produced in a form which clearly sets out the existing priorities and clear phasing and delivery mechanisms rather than providing policy support for much longer term land releases to the east of Inverness where land owners and developers are seeking to develop out sites well in advance of the necessary infrastructure being in place to facilitate such large scale growth.
- 1.4 In addition it is incumbent on the council to assess the capacity of existing land within the settlement boundary and immediately adjacent to existing boundaries which can be developed for land uses which are needed over the course of the development plan period **before** new, less sustainably located land further east is identified for specific land uses. In this regard, there is clearly land available within and around the Inshes area which can



be utilised much more efficiently and this should be targeted and prioritised. The following section provides more detailed comments on the Main Issues Report and the questions it raises specifically in respect of pages 10 to 17 which consider the A96 corridor and eastern Inverness.



## 2.0 COMMENTS ON MAIN ISSUES REPORT

- 2.1 Section 17 of the Planning etc (Scotland) Act 2006 refers to the production of Main Issues Reports. Subsection 2(a) requires planning authorities to set out general proposals for development and in particular where development should and should not be carried out.
- 2.2 The Main Issues Report produced sets out general principles for development but due to the broad brush nature of much of the document, many issues which affect development projects in the Inverness area are not covered in any detail and therefore land owners and stakeholders are not able to assess how the development plan intends to deal with specific land use issues, particularly to the east of the city.
- 2.3 In addition there appears to be an issue of prematurity in respect of the production of the plan and the development principles set out as identified on page 12 paragraph 4. This states *'In order to ensure that development of the A96 corridor can take place in a managed way, further work is being undertaken to confirm at what point these improvements to the A96 corridor are required'*.
- 2.4 This acknowledgement of further work required indicates that the council cannot be in a position to identify any meaningful development strategy at a time when the delivery of necessary infrastructure is yet to be fully considered and a conclusion drawn. In particular the preferred option as set out on page 13 of the report supports early phases of development across the corridor before major infrastructure is completed. Such a policy position clearly cannot be justified at a time when existing infrastructure capacity and future upgrading has yet to be fully assessed. Providing support for any new expansion land in the A96 corridor in such circumstances cannot be justified.

### Comments on Infrastructure Issues

- 2.5 While the Main Issues Report indicates that the Development Plan will identify the key locations and infrastructure for development in and around Inverness and specifically identifies the Inshes as a key development area and an area for transport improvements, the report fails to reflect or mention its own detailed assessment of the Trunk Link Road (TLR) and in particular the outcome of their recently completed studies into the Inshes upgrading of the TLR.



- 2.6 The Main Issues Report is surprisingly lacking in detail on the critical issue of the constrained infrastructure within the Inshes area, which the Council has determined will restrict development opportunities within the east and south of Inverness and the development opportunities along the A96 corridor unless significant improvements are implemented. While reference is made to working with developers and the community to identify improvements to the Inshes traffic interchange, this makes no reference to the work already undertaken by those parties and the Highland Council, where the road alignment options have already been identified and community/developer consultation undertaken.
- 2.7 It is also surprising and disappointing that more emphasis is placed on the A96 upgrading and the A9/A96 link road than the delivery mechanism for the TLR in the vicinity of the Inshes Roundabout and the Inshes Retail Park/District Centre, which is not only the catalyst for delivering the land allocations in the adopted Local Plan, the committed development and the more recent Raigmore Hospital and any development at Beechwood, but is also the catalyst to the successful provision of the A9/A96 link road and the A96 corridor upgrade. Without the necessary capacity at the Inshes interchange between the TLR, the Inshes Roundabout and the A9, none of the proposed development opportunities or the infrastructure proposals will achieve their full potential, nor will they reduce congestion or fulfil the aspirations for full and proper sustainable transport facilities. Without a firm and deliverable proposal at Inshes any land allocations with substantial new traffic generation potential within this vicinity must be premature. The Main Issues Report should make this clear.
- 2.8 It is understood that the Government's Strategic Transport Projects Review (STPR) identifies the A96 upgrading and the A9/A96 link road as strategic proposals. However, no timescales or delivery mechanisms for these works are provided. We also understand that the Highland Council and Transport Scotland are currently reassessing the opportunities and options for these infrastructure packages, but there appears to be some uncertainty as to whether the Inshes TLR works to the west of the A9 are included in this review or included as part of the STPR works. As noted above, the inclusion of the Inshes interchange works, particularly to the west of the A9 is critical to any development and infrastructure aspirations and we would request that the Main Issues Report and any associated Development Plans, the Local Transport Strategy and/or the current joint review with Transport Scotland specifically define and include the mechanisms and timescales for the delivery of the TLR upgrading in the Inshes area. Without this information being included and conclusions on



delivery being reached, the expansion strategy for eastern Inverness is not based on sound principles.



### **3.0 COMMENTS ON PREFERRED OPTIONS IN RESPECT OF A96 CORRIDOR**

- 3.1 Kilmartin Property Group does not support the preferred options as these relate to the A96 growth options.
- 3.2 KPG considers that before any further work is undertaken in respect of identifying development sites set out within the A96 corridor framework or in supporting any early phases of development, it is imperative to conclude the work already begun in developing a solution to the long term capacity issues at Inshes roundabout. This work requires to identify a physical solution to the congestion issues which are already prevalent and to identify a land use strategy which will regenerate the Raigmore/Inshes area. This work should be prioritised as only when the capacity of any new road layout is known can a new expansion land use strategy be devised.
- 3.3 In addition, the form and scale of new land uses further east should take into account the potential for new development in the vicinity of Inshes roundabout and that which is likely to be displaced or redeveloped as a result of the potential extensive nature of road improvements. The Framework Outcomes table on page 17 of the Main Issues Report should be deleted along with any supporting text until the capacity of land in the Raigmore/Inshes area has been thoroughly assessed. This is particularly important in respect of new retail development as a large amount of new and relocated retail and commercial floorspace can be accommodated at Inshes and this should be assessed in detail prior to any support being given to new retail development in the East Inverness Framework Plan area.

*PJP/November 2009*



