

The Highland Council

City of Inverness Area Committee

2 December 2014

Inshes and Raigmore Development Brief

Verbatim Comments Received on Draft Inshes and Raigmore Development Brief

VERBATIM COMMENTS RECEIVED ON DRAFT INSHES AND RAIGMORE DEVELOPMENT BRIEF

Customer/ Organisation	Verbatim Comments
Scottish Christian Party, Inverness Branch (per D Boyd)	<p>The Scottish Christian Party Inverness Branch has submitted its suggestions to the Inshes and Raigmore Development Brief's earlier proposals on 31/7/2014. In it, we said that a four-way junction with traffic lights is not necessary; the Inshes roundabout functions adequately most of the day except for a short period during the rush hour at each end of the day. The new proposals for the petrol station will reduce the six entry roundabout, making it even more manageable. Subsequent discussions have modified some of our earlier proposals and we submit these additional considerations to the current consultation:</p> <ol style="list-style-type: none"> 1. At a recent consultative public meeting, local residents described the link to the A9/A96 connection study as 'a road to nowhere'. We propose that this can be solved by ensuring that this link has four way connection with the A9 and does not simply cross it. As the A9 is rising at this point, the solution is to have an underpass of the A9 with two small roundabouts on the west and east of the A9 in the lower fields. This will reduce the length of the sliproads to and from the A9, improve general amenity for the crossing of the rising A9, and will preserve the current A9 overbridge. This necessitates leaving adequate space on the west of the A9 for a small roundabout and slip roads. 2. The improvements to the current A9 overbridge are a priority in view of the opening of the University Campus in 2015. This work can be joined with the proposals for realigning the road to Tesco Inshes and the petrol station. 3. There is little consensus on replacing the Inshes roundabout. If the A9 overbridge and Tesco improvements are phased first, we will have time to see the impact on the roundabout. 4. The impact of altering the Inshes roundabout on access to the Drakies estate has met with strong resistance. A complete re-think is necessary of the area between the Inshes roundabout and the entrance to Raigmore Hospital in order to incorporate easy entrance and egress from the hospital and Drakies estate. Currently this area has three lanes of traffic with two pavements, another public two-way road with pavement servicing the housing estate, separated with a significant area of land. This huge resource needs to be better utilised. It should be possible to make the whole area a one-way system to allow traffic to enter and exit each point with a left-hand turn. This will improve traffic flow and give plenty of room for stacking vehicles. Traffic lights can facilitate entrance to the system from Draikies Avenue and from Raigmore Hospital, but it is questionable if they would be necessary anywhere else, if the Inshes roundabout is retained and incorporated into the new layout.
E Cload	<p>Please don't make the lane into a big road because it won't be safe to walk to Tesco.</p>
L Cload	<p>I am writing concerned that the proposal to develop the land around Inshes Tesco has not considered the traffic movements and pedestrian safety. Adding a new junction onto the already congested Culloden Road does not make sense. I regularly observe the Raigmore Hospital junction backing up through the Inshes Roundabout and up Culloden Road. Adding more traffic to Culloden Road prior to improvement to Inshes Roundabout and the Raigmore Hospital junction would cause increased congestion. The development would increase the traffic issues further. The proposal to add the junction to Culloden Road does not consider the effect of adding the Western Link (new bridge across the River Ness), which could include a short cut from Culloden Road to the Southern Distributor Road, increasing traffic around the housing estate; this increase in traffic is not meant for the existing roundabouts, would cause problems exiting from the Inshes Estate, and increase the risk to children going from the estate to the shops. There would need to be a significant improvement in safety of pedestrians, crossings and general pedestrian and cyclist infrastructure. The proposed development combined with the Western</p>

* Indicates supporting document supplied – see appendix A

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	<p>Link will also increase cars using the road past the Inshes Estate. An important pedestrian route exists from Inshes Estate down the lane next to Dell Burn to Tesco and the bus stop to the city. Blocking this would lengthen journey time and discourage walking and cycling. In the overall development strategy, further consideration should be given to the future road routes in the area when the Western Link is in place. I agree with the view that the development of the greenfield site should be undertaken after the development around Harry Ramsdens and the old Blockbusters site. There are a number of other brownfield sites within Inverness such as the old B+Q site that should be developed before the proposed development. I do not agree that the development should be linked with the new A9 connection. I also believe the development brief area is too narrow and the new A9 connection further south to connect to the Co-operative roundabout would offer better development opportunities around the new Co-operative shop where there are few amenities at present. Due to the housing estate nearby, if the development is allowed to go ahead restrictions should be placed on the opening times and use of the development to restrict noise, litter and disturbance. Tree planting should also be required between the development and the A9 and the development and the Inshes Estate to compliment the existing mature trees. The existing mature trees are an important nesting site for rooks which should not be damaged. The site would be better to be used to reduce the flood risk to the existing Tesco's and create a green space amenity for the area.</p>
B Cruikshank	<p>I am not sure if you are aware of the following. When the houses on the section of Old Perth Road that encompasses the "Wimpey "estate(all the properties built by Wimpey that face the main road/hospital) their feu's were extended out to the rear of the footpath on the main carriageway. In other words, we technically own the piece of roadway and grass verge in front of our homes. Thought you might be interested!</p>
C Dickinson*	<p>When incorporating joint pedestrian and bicycle crossings, the width of the crossing area needs to be increased. This should include separate lanes markings for each mode of transport, i.e. like the rest of Europe. This reduces accidents at crossing points. The proposed plan clearly promotes increased car use and will fails to reduce traffic numbers by not supporting the needs of greener forms of transport. The recently added cycle facilities in the area of the new University Campus are a disaster and fail to take into consideration the needs of pedestrians and specially cyclists. I use these roads every day on my bicycle to travel to and from work, and from my perspective the recent additions and proposed changes don't meet the needs of commuters who opt to use anything other than a car. It's obvious those involved in the recent planning either don't cycle to work or fail to grasp the need to provide green transport schemes over those of the motor car. A case in point: minor road traffic is not given priority over the traffic on a major road, unless of course you're on a bicycle, then you're forced to giveaway to the traffic of the minor road at every junction. This approach encourages cyclists to ignore the cycle track and stay on the main road. Drainage, roads breakup due to the effect of traffic volume and adverse weather. Road quality is maintained longer if surface water can be dealt with quickly, in Germany they include two course of bricks that sit on a bed of grit with an underlying drain (see photo) at each side of the road, this allows water to escape in to the drainage system. It's very successful and you don't see surface water on German roads. At crossroad junctions they pave the full junction with these stones. It stops water running down one road onto another; also because the stone is light in colour it provides a contrast were pedestrians cross thus making them easier to see in winter, it also acts slows down traffic, as the change in surfaces causes drivers to slow down, yet it does not adversely affect those traveling in an ambulance (unlike a speed ramp).</p>
SportScotland (per E Fotheringham)	<p>Thank you for consulting with sportscotland in connection with the above. We made comments on the Development Brief as part of the previous consultation - 'Inshes and Raigmore Development Brief - Issues and Options'- in July. We therefore have no additional comments to make on the Draft Brief, and would request that our previous comments be considered again at this stage, if appropriate. Please contact me if you require anything further.</p>

* Indicates supporting document supplied – see appendix A

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C Fraser	<p>1. Keep cyclists away from pedestrians - i.e. barriers. Cyclists on pavements/walkway are dangerous. Need to be considerate. 2. Offer land to people to grow their own food i.e. allotments for all who want one. Secure from vandals, thieves. 3. For now - Culcabock roundabout needs p/time traffic lights to keep traffic flowing. 4. Pedestrians must be given access via proper bridges across all new roads. Also cyclists and horse riders.</p>
Slioch Property (on behalf of R Matheson, per M Gillespie)	<p>I act for Mr R Matheson, Drakies House, Inverness.</p> <p>Mr Matheson owns the development site immediately to the north of Drakies House, designated IN52 in the current Local Plan. Site IN52 is outwith the subject area of the development brief, however the road which provides access into IN52 is a fundamental part of the development brief.</p> <p>Development allocation for IN52 is as follows:</p> <p>Site: <i>IN52 East of Culcabock Ave</i></p> <p>Area (ha): <i>2.6</i> Uses: <i>24 homes, Retail, Business</i></p> <p>Requirements: <i>Developer to prepare masterplan / development brief to be agreed with the Council who may adopt this as Supplementary Guidance. This should address: road/footway access improvements (essential to any increase in development capacity – no intensification of access from Old Perth Road); any commercial uses should be limited to redevelopment of motel frontage with low density housing to rear.</i></p> <p>The development brief proposes various changes / improvements for the Fluke Roundabout as well as Ambulance Junction which sit immediately to the north of IN52.</p> <p>Given that the Local Plan requires access improvements to enable the development of IN52 I am concerned that the proposed road improvements to Old Perth Road contained within the development brief have no regard to this requirement; and may in fact restrict future access options for IN52.</p> <p>This issue has already been raised with TECS who I hope will be able to provide a solution that assists in the development of a zoned site.</p> <p>I would therefore ask that the planning brief be amended to include alternative road solutions / options that will assist the access and development of IN52 in line with the Local Plan; rather than restrict future options as is the case with the current proposals.</p> <p>I am available to discuss any proposals should you so wish.</p>
M Gordon	<p>1) All contexts and Policy(s) should be withdrawn a.s.a.p and retained as a green wedge also the finding from the 2004 (P.L.I that was hend then) 2) Retain all amenity on site (If not there will be a lack of impact to residential properties and their land title deeds within this area. 3) Further work on floor risk(s) and drainage plans (need to be in place first and foremost) watertables can be found here with prolonged times of rain as was overnight next day as was on 8th October 2014 (also at 2002) Dell of Inshes Burn (will burst it's banks in time - when it's too late) P.S as always I wish any hard copy(s) plan (s)</p>

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Customer/ Organisation	Verbatim Comments
	A1 Spec colour and report(s) sent to me (as they are made available)
Scottish Environment Protection Agency (per S Haslam)	<p>Thank you for your consultation email which SEPA received on 15 September 2014 specifically seeking comments on the Draft Inshes and Raigmore Development Brief. We welcome the opportunity to provide formal comment.. We are supportive of the positive approach taken on issues within our remit such as flood risk, SUDS, culverting and connection to the public foul sewer. It is made clear in the document that development in this area is closely connected to the Inshes Junction Improvements project, which includes a significant element of flood alleviation for the Dell Burn. We look forward to reviewing the full details of the proposed works on the Dell Burn under that separate project and understand that by necessity, assessment work for that will be carried out separately and full details are not available at present to inform this document. It is also made clear for all the development areas in the Brief that the outcomes of that project will have to be considered and allowed for and we are satisfied with that approach. It is hoped that some of the detailed study required for the Dell Burn may help inform the appropriate development of the surrounding areas. The only revision we request is that in Section 1.20 the text is modified to state "Both these watercourses have not been modelled in the SEPA Flood Maps due to their small catchment size, and therefore flood risk areas are not shown on figure 6". This will explain to the reader why these watercourses have not been included in the maps. Should you wish to discuss this letter please do not hesitate to contact me.</p>
Scottish Natural Heritage (per G Hogg)	<p>Thank you for the opportunity to comment on this draft development brief, which when adopted will be statutory supplementary guidance to the Highland wide Local Development Plan. We commented previously on the Issues and Options Paper in July, and are pleased that most of our comments then are reflected in this draft brief. We particularly welcome the recognition of the green network within the area and linking into the wider green network (both in regard to habitats/open space and active travel), and provisions for its maintenance and enhancement. This includes 'green infrastructure' features such as watercourses, trees, open space, allotments and paths. We make a number of further detailed comments in the annex to this letter to strengthen this aspect of the development brief. I trust this will be of assistance to you in finalising this development brief. However we note that this may need early review once key transport design projects in the area (Inshes Junction Improvement Phase 2, and Transport Scotland A9/A96 Connections Study) are finalised. These have implications for the green network in the area. If you have any queries please do not hesitate to contact Andrew Brown, Planning Adviser in the first instance.</p> <p>Detailed comments on Draft Inshes and Raigmore Development Brief</p> <p>Para 1.18 – we recommend reference to watercourses and paths are added to this paragraph on green networks, i.e. “The area contains some attractive and valuable green networks, consisting of watercourses, open space, trees, planting and paths”.</p> <p>Figure 7 Opportunities Overview – we strongly welcome the identification on this map of ‘Active travel/green network enhancement opportunities’ and ‘watercourses’. We consider these two aspects are inter-related, since watercourses are a ‘blue’ feature of the green network. We recommend that the green network symbolisation is extended to include the following additional parts of the plan area, and linking in to surrounding areas –</p> <ul style="list-style-type: none"> • Southwards from Dell of Inshes (watercourse + path) • South-eastwards from Dell of Inshes (watercourse + trees, linking to a tree belt) • North-eastwards from Raigmore Park (to include the ‘Golden Bridge’ active travel link)

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	<ul style="list-style-type: none"> • to Beechwood) <p>Para 2.14 – we also warmly welcome this section on green networks within the brief. We suggest it could begin by explaining why it is important to safeguard and enhance green spaces and the green network. Therefore we suggest text along the lines of the following could be added at the beginning – “Green spaces and green networks make a strong contribution to the sense of place of this area. They provide an attractive framework in which people live, work, shop and receive healthcare”. After the first sentence we then recommend text is added/amended as follows – “Figure 7 indicates the existing green network in the area (including links to the wider green network) and opportunities for enhancement that should be delivered as part of development proposals. This includes safeguarding of watercourses and their margins, and retention and enhancement where possible of tree belts. Green infrastructure should be an integral element of development proposals. Walking and cycling routes form an important part of the green network, and most opportunities within the brief area to enhance this aspect of the green network coincide with identified active travel improvements (see Figure 8)”.</p> <p>Figure 14 Dell of Inshes Design Guidelines – we recommend watercourses are shown on this figure, given their important role as part of the green network. We then recommend the Key for ‘Green and habitat network enhancement’ includes reference to watercourses as follows – “Visually attractive landscaping and improved wildlife habitats that minimise/compensate for any loss of existing mature trees and link to existing network”</p> <p>Paras 2.22 and 2.26 – we welcome the safeguarding of existing green network features as aKey Requirement for Built and Natural Heritage for Dell of Inshes and Land South of Police Scotland. To complement this (bearing in mind e.g. paras 221 and 232 of Scottish Planning Policy 2014) we suggest another Key Requirement here should be –</p> <ul style="list-style-type: none"> • Incorporation of green infrastructure as an integral element of detailed design
Culcabock & Drakies Community Council (per J Home)	<p><u>OBSERVATIONS ON DRAFT INSHES AND RAIGMORE DEVELOPMENT BRIEF</u></p> <p>Observations and response following Public Meeting at Inshes Church 29-09-14</p> <p>Following the Highland Council’s Planning and Development Service and open discussion CULCABOCK & DRAKIES COMMUNITY COUNCIL wishes to comment on the following:</p> <p>DEVELOPMENT SITES</p> <p>DELL OF INSHES</p> <p>It appears that Highland Council believes that retail is the appropriate use for this site and holds this view solely because this is the use already put forward by a prospective developer. Highland Council does not seem to have considered whether any other form of land use would be more appropriate.</p>

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	<p>The Dell of Inshes site occupies a pivotal location. It already sits close to the interchange of two Trunk roads (A9 and A96) and these will become three once the A82(T) is connected via the SDR and proposed River Ness / Caledonian Canal crossings. Therefore, this site presents location advantages which make it suitable for a wider range of land uses than just retail.</p> <p>The site is close to: Raigmore Hospital; Police Scotland Northern HQ; University of the Highlands and Islands campus; Lifescan and Beechwood Business Park. The presence of these large private and public sector employment activities, all grouped near Raigmore roundabout suggest that this part of Inverness has location advantages attractive to major organisations. Such alternative uses might include: Education; Public / private sector Health; Research; Civic administration; Hotel; Residential retirement or care home. The Planning Authority should broaden the scope of development options considered suitable for this site and include these in the Brief in order to attract a broader spectrum of developers from all business sectors.</p> <p>The Community Council believes that further retail development at Inshes would be detrimental to the local communities. Inshes Retail Park already contains a large amount of retail floorspace, including: Blockbuster; Dunelm; Hobbycraft; Brantano; Deichman; Matalan; Dobbies; Tesco and Aldi.</p> <p>Residents of Drakies and Milton of Leys do not need more retail outlets.</p> <p>Inverness City centre is commercially dying as a result of ‘edge of centre’ and ‘out of town’ retail development. If the Planning Authority were to apply the ‘sequential test’ as per Scottish Planning Policy then prospective developers of supermarkets or any smaller scale retail development might reasonably be directed to the already serviced site located in front of Blockbuster shop unit (currently empty). The Planning Authority should clearly demonstrate, through the medium of the Development Brief, how a retail development on the Dell of Inshes site would accord with principles of sustainability when the Eastfield Retail Park lies only one mile distant.</p> <p>LAND SOUTH OF POLICE SCOTLAND</p> <p>Any development on this site should be accessed as per the routes suggested in the Draft Development Brief and under no circumstances should there be any incursion of any kind, including for access purposes, into Drakies playing fields or the children’s play park lying between Drakies housing and the Southern Distributor Road.</p> <p>Culcabock and Drakies Community Council are concerned that development of this site could have a detrimental effect on the amenity of nearby residents, particularly those living on Drumossie Avenue. Development should avoid any overlooking of residential properties, incorporating a generous separation of buildings and activities, ensuring no nuisance is caused by noise, fumes or lighting. The draft Brief proposes car parking as the land use adjacent to Drakies housing and if this is what transpires the car park should be screened by fencing and planting as necessary with lighting of a type designed to cause no intrusion or detriment to residential amenity.</p>

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	<p>TRAFFIC MATTERS</p> <p>During the public meeting reference was made to a proposal to widen Old Perth road by means of incorporating all, or part, of the grassed strip separating Old Perth Road and the Drakies access slip road that runs parallel with it.</p> <p><u>Drakies Community Council is emphatically opposed to this proposal or any measure that would cause loss of, or reduction of this green strip.</u></p> <p>When built in the late 1960's early 70's Drakies was on the periphery of Inverness, it is now surrounded by housing, retail / business parks etc. It is an established housing neighbourhood with its own distinctive character formed through a combination of traditional house designs and a well designed internal road layout, interspersed with areas of grassed public open space.</p> <p>These open spaces contribute collectively towards creating a high standard of residential amenity and give Drakies its spacious character, providing as they do the spatial setting for housing and separation from surrounding non-residential uses and activities. The latter point is important in highlighting the role that the Old Perth Road strip plays in not only creating separation between housing and traffic but also reduces the impact of traffic noise and fumes upon residents.</p> <p>At the Public Meeting the Planning Service representative stated that the Authority places a strong emphasis on achieving a high standard of urban design as part of the new Dell of Inshes development. The Authority should be equally committed to safeguarding existing examples of good quality urban design from loss encroachment.</p> <p>Whatever traffic congestion there is at peak times on Old Perth Road is the result of a broader, overburdened traffic network and the solution should be sought through achievement of an improved network / traffic management scheme. Incremental widening of Old Perth Road would only shunt the traffic congestion elsewhere along the road thus achieving a minimal temporary improvement at significant cost and irretrievable detriment to the suburban character of Drakies.</p> <p>ACCESS PROPOSAL DRAKIES TO OLD PERTH ROAD</p> <p>The Community Council does not agree with the proposal to form a single light controlled access from Drumossie Avenue onto Old Perth Road as this would encourage non-local traffic to enter Drakies and cause it to be used as a rat-run or cut-through.</p>
Westhill Community Council (per C Johnson)	<p>Firstly, once again, we welcome the opportunity to respond to the development brief and refer you to our previous comments - your ref: 01669. We wish to stress the importance of creating the additional lane(s) on the Inshes Overbridge. This will help alleviate the problems of the traffic queuing on the A9 and surely, therefore, must be a combined project between yourselves (Highland Council) and Transport Scotland. Again we emphasize the need for this work</p>

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	<p>to be carried out as soon as possible to address safety on the A9 and, particularly, with the opening of the Campus next year. We support the proposed new access to Tesco and encourage further restrictions on accesses to the Inshes roundabout but recognize further studies are required as this may cause problems for Drakies residents. However, we repeat the roundabout itself is not a major problem and should NOT be replaced by traffic lights - any additional traffic lights on the B9006 will increase congestion not solve it.</p>
<p>A Johnson</p>	<p>Response to Draft Inshes and Raigmore Development Brief: Supplementary Guidance (Autumn 2014)</p> <p>My comments mainly relate to the proposed Inshes and Raigmore Development Brief material elements relating to the Dell of Inshes site only as my property is affected by this proposal only.</p> <p>The Inshes and Raigmore Development Brief update, Autumn 2014 has been updated following the spring/summer 2014 consultation exercise held jointed with representatives from both THC Roads and Transport department and Transport Scotland. It is noted that representatives from both these transport organisations were not present at the public consultation exhibition and presentation/sessions held on the 29th September 2014.</p> <p>The fundamental principles for the Inshes and Raigmore Development Brief is to provide a development framework to co-ordinate and best utilise improvements to strategic road capacity and to achieve no net detriment to the existing surface water drainage and attendant flood risk.</p> <p>Therefore it is disappointing that suitable representation on these topics have not provided to support the public consultation. This failure seriously undermines the public consultation exercise as public as well as concerned local stakeholders have had no direct opportunity to discuss and challenge the proposals with the creators of these significant and critical elements of the Inshes and Raigmore Development Brief.</p> <p>1: Invalidate Supplementary Guidance</p> <p>It is recognised in the Inshes and Raigmore Development Brief, page 3, Para 1.3 that the brief if being prepared in advance of the finalisation of the Inshes Junction Improvements Phase 2, including its related flood alleviation scheme, and the Transport Scotland A9/A96 Connections Study. It is claimed that once the brief is adopted it will provide a sufficient level of detail for the Council to determine planning applications in the area.</p> <p>This statement is contested in this response to the Inshes and Raigmore Development Brief. As the Brief is proposed to be adopted as Supplementary Guidance it must provide detail to provide assessment criteria to determine planning applications in the area.</p> <p>Sections 93 to 99 of Circular 1/2009 Development Planning provide details about supplementary guidance. Planning authorities may decide to address certain issues by way of supplementary guidance, which may be prepared and adopted alongside the Local development plan. Regulation 27 of the Development Management Regulations states than “Supplementary guidance adopted and issued under section 22(1) of the Act in connection with a particular strategic development plan or local development plan may only deal with the provision of further information or detail in respect or the policies or</p>

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	<p>proposals set out in that plan and then only provided that those matters which are expressly identified in a statement contained in the plan as matters which are to be dealt with in supplementary guidance.</p> <p>Therefore Supplementary Guidance should focus on detailed material. This allows the Local Development Plan to focus on vision, the spatial strategy, overarching and other key policies, and proposals. To give weight to supplementary guidance, it is recommended that there should be a direct link between a Local Development Plan and the Supplementary Guidance.</p> <p>As noted in Circular 1/2009, supplementary guidance has to cover topics specifically identified in the Local development plan as being topics for supplementary guidance. Supplementary guidance is also limited to the provision of further information or detail in respect of policies or proposals set out in the local development plan. Suitable supplementary guidance topics include:</p> <ul style="list-style-type: none"> • Detailed policies where the main principles are already established • Allocations of small areas of land or local policy designations that do not impact on the spatial strategy of the wider plan area • Development briefs and masterplans • Exact levels of developer contributions or methodologies for their calculation <p>It is noted that Local Development Plans should contain the main proposals for the 10 year period from adoption and provide a broad indication and scale and location of growth for 20 years from adoption including any specific allocations.</p> <p>Because the Inshes and Raigmore Development Brief, is being prepared in advance of the finalisation of the Inshes Junction Improvements Phase 2, including its related flood alleviation scheme, and the Transport Scotland A9/A96 Connections Study, it is therefore based on undefined, unsubstantiated and invalidated information. No evidence has been provided to justify any of the roads or flood alleviation proposals presented including the need for a district centre at the Dell of Inshes Site.</p> <p>Indeed the local and trunk road proposals are based on traffic data now over 5 years old and do not reflect or recognise completed and ongoing developments.</p> <p>Traffic Model data unrepresentative: It is understood from discussion at the public exhibition held on the 30th May, with THC and their Transport Modelling Consultant representative that the traffic data was collected in 2009 for the production of the "Inner Moray Firth Local Development Plan" and concentrates on the "travel to work" area. The associated "IMFLDP Modelling Report", Rev 4 Aug 13 states that the Multi-Modal model is at strategic level and has limitations in assessment at local level. The report recognises that further data is required to assess local issues. The report also confirms that no improvement to the local traffic flow within Inverness City can be achieved. It is understood that the 2009 data has not been updated to reflect recent</p>

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	<p>developments but has been used to determine the traffic flow and travel time comparisons in the Connections Study.</p> <p>The increase in local traffic associated with recent retail and residential developments in the Inshes and Southern Inverness areas do not appear to have been incorporated into the modelling assessment. Therefore the reference data to underpin the connections study is considered representative as it has not been validated with recent traffic survey information.</p> <p>Local Development Plan scope: Also if the Local Development Plan contains main proposals for the 10 year period from adoption and provide a broad indication and scale and location of growth for 20 years then the Inshes and Raigmore Development Brief fails to present the necessary evidence that due consideration has been accommodated on all material matters identified.</p> <p>Particularly in the absence of the necessary supporting requirement definition the Inshes and Raigmore Development Brief therefore fails to provide the necessary detail in respect to co-ordinate and best utilise improvements to strategic road capacity and to achieve no net detriment to the existing surface water drainage and attendant flood risk.</p> <p>Furthermore matters that should be included in the Local Development Plan and not in supplementary guidance include:</p> <ul style="list-style-type: none"> • Development proposals of more than local impact • Green belt boundaries <p>The Inshes and Raigmore Development Brief is contrary to the planning guidance for the production of supplementary plans in that it incorporates the provision of enhancements for local and strategic road network improvements and also it promotes the expansion of the development boundary as defined in the adopted Local Development Plan into residential and green wedge areas.</p> <p>The provision of local and strategic road network improvements such as the Inshes Junction Improvements Phase 2, and the A9/A96 Connections Study are clearly development proposals of more than local impact and therefore matters that should be included in the local development plan in accordance with planning guidance. The local road improvements have to be considered as part of the wider Inverness multimodal transport development needs. The immediate need in the Inshes and Raigmore area is only part of the arterial flow to and from the city centre to local areas and beyond including the trunk road network.</p> <p>A9/A96 Connections Study Undefined Objective: The A9/A96 Connections Study is stated to be have been undertaken in line with the STAG although it is difficult to confirm this from the limited information provided. Indeed there is a lack of any definitive statement of requirements which undermines the value and purpose of the options presented to the Public for consideration. Some information is provided in summary form of the identified problems and opportunities. However no information is provided of the study objectives nor of the option generation process. No selection criteria weighting is stated and combined with the lack of a definitive objective/problem statement to address any comparison of the options proposed becomes subjective to assess.</p>

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	<p>Indeed the stated aim of the proposed new link road to improve connectivity is vague and unclear in purpose. If the objective is to relieve congestion on the Raigmore interchange then a comprehensive traffic survey should be undertaken to determine the trunk and local road user requirements. The apparent absence of user functional requirement capture information is concerning noting the advanced assessment and optioneering presented. As the study objective is undefined and the apparent lack of a user requirements then it is concluded that the subsequent assessment is potentially invalid as there is not any measure to confirm adequacy, compliance and acceptability.</p> <p>Similarly the Inshes and Raigmore Development Brief attempts to justify a safeguard for three alternative trunk road improvements each of which have no defined requirements definition or movement strategy.</p> <p>This is demonstrated in that two options identify improvement to the trunk road which terminate at the Dell of Inshes site with access through a residential and retail are to reconnect back to the local road distribution. Indeed in these two options traffic using the proposed trunk road improvements will defer to travel along the shorter existing local road distribution. It is evident that no development consideration of the need to bring local and strategic road improvements into the Dell of Inshes site has been undertaken to assess the local impact and other affected areas. For these reasons the Inshes and Raigmore Development Brief is invalid and should be rejected.</p> <p>Reason for Rejection, Point 1: The Inshes and Raigmore Development Brief is invalid as it is contrary to planning guidance in that it does not present the necessary level of detail to justify a local plan with respect to local and strategic road improvements as well as the development proposals should be presented in the Local Development Plan and not in supplementary guidance.</p> <p>2: Invalid extension to the Development Brief</p> <p>Page 4: Policy Context, Para 1.5: States the Highland-wide Local Development Plan was adopted by the Council in 2012. Para 1.6: Policy 7 of the Highland-wide Local Development Plan commits the Council to produce a development brief of the Inshes and Raigmore area. However para 1.6 states “Since the publication of the Highland-wide Local Development Plan the brief boundary has been expanded to include additional areas that have potential for change.”</p> <p>Figure 3, page 3 presents the Inshes and Raigmore Development Brief area adopted in 2012. The expanded boundary is shown in Figure 1, page 2 and includes not only my property but adjoining residential properties. The reason stated for this expansion is that these additional areas have “potential for change”. It is therefore appropriate to expand the area of the Development brief on this unsubstantiated basis which I contest as follows:</p> <p>The proposed expansion of the development brief is out with the area boundary identified in the adopted Highland-wide Local Development Plan and therefore the Council has no Authority to claim the additional areas have the potential for change. Indeed I have already written to the The Highland Council in August 2014 in response to the summer 2014 consultation exercise for the Inshes and Raigmore Development Brief to include my property</p>

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	<p>boundary as a development “Constraint”. I note this has not been incorporated or recognised on the latest proposals. Indeed since inclusion of my property in the draft supplementary guidance I confirm that I have been denied financial assistance from lending organisations due to the future uncertainty the development brief expansion has inflicted on my property yet there is no basis for the expansion to apply. I confirm I am financially adversely affected by a the resultant development uncertainty following the misrepresentation of the developable area due to the invalid proposal to expand the Local Development Plan via supplementary guidance.</p> <p>Reason for Rejection, Point 2: The Council have expanded the area of the Inshes and Raigmore development brief out with the adopted Highland-wide Local Development Plan defined boundary area rendering the proposal invalid.</p> <p>Reason for Rejection, Point 3: Not withstanding Point 2 above the Council have failed to suitably consult directly with the property landowners of the proposed expanded development area to notify them that the Council considers their property to “have potential for change” and consequently have adversely affected their financial status.</p> <p>3: Inadequate Flood Risk Assessment and net detriment increase</p> <p>Page 5: Policy 7 Inshes and Raigmore, Policy 7 of the Highland-wide Local Development Plan commits the Council to produce a development framework for the Inshes and Raigmore area, which will be brought forward as supplementary guidance. The guiding principles for such guidance will be:</p> <ul style="list-style-type: none"> • to promote, coordinate and best utilise improvements to strategic road capacity; • to build consensus with the community and stakeholders; • to achieve no net detriment to the existing surface water drainage regime and attendant flood risk; • the reconfiguration of the Raigmore Medical Campus to allow better public transport and active travel connectivity and to assess the potential for additional primary care facilities in place of staff accommodation; • the southern expansion of Police Headquarters; • the reconfiguration of and potential expansion of Inshes Retail Park provided that expansion help deliver improvements in strategic road capacity; and • provision for mitigation measures in relation to any identified environmental issues. <p>These guiding principles each require a design development methodology and technical governance regime to define and bound the functional requirements in support of the Inshes and Raigmore Development Brief such there is assessment criteria to consider future development proposals. It is noted that no design development methodology or technical governance regime is presented other that the design solutions presented in the Draft Inshes and Raigmore Development Brief. It is concerning that design solutions are therefore presented to form the basis of the Inshes and Raigmore</p>

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Customer/ Organisation	Verbatim Comments
	<p>Development Brief yet no supporting justification has been provided to substantiate the solutions proposed.</p> <p>For example there is neither evidence of a flood risk assessment nor any consideration of alternative flood mitigation proposals. It is recognised that THC have supplementary guidance, Flood Risk and Drainage Impact Assessment which is not referenced or mentioned in the brief noting this document does not address provision in relation to supplementary guidance production.</p> <p>There is also no evidence of a Strategic Flood Risk Assessment (SFRA) which is the fundamental step in the assessment process as defined in the SEPA Technical Flood Risk Guidance for stakeholder's document, ref SS-NFR-P-002 to support supplementary guidance. Instead the Inshes and Raigmore development Brief only presents an attenuation flood storage pond as the proposed design solution and explains on page 6 para 1.20 that "flood risk areas are not shown".</p> <p>In para 1.21 the Brief mentions that the Council has commissioned a number of studies on the Dell Burn which explored options for flood alleviation schemes although there is no further explanation provided to confirm the basis of these studies and relevance to the development brief. It is stated in para 1.21 that the most recent proposals, including resulting implications for the development area are described in section 2 of the brief. On review of section 2 there is no discussion of the resulting implications and no bounding definition to confirm the scale of the proposal nor the proposed flood management arrangements.</p> <p>There is neither discussion on how this pond has been defined nor any consideration of the hydrological requirements, demand or operation. There is no evidence of a flood Risk Assessment of a Drainage Impact Assessment which would be needed to provide the necessary level of detail in support of supplementary guidance. It is accepted that an attenuation pond will provide a sustainable drainage system (SUDS) but there is insufficient assessment provided to justify its application in this situation.</p> <p>It is completely inappropriate to incorporate final design mitigation solutions in the Inshes and Raigmore Development Brief where there is no evidence of due design development and governance processes have been followed such as a SFRA and the key principle of flood risk avoidance. Furthermore the position of the proposed pond would involve the complete removal of the existing mature tree lined avenue which separates the retail park from the adjacent residential area.</p> <p>This is not effective or responsible environmental planning and contrary to the Policy 7 guiding principles. SEPA have developed specific Land Use Planning SEPA Guidance Note principally Notes 2 and 11 regarding provision of planning advice on Sustainable Drainage Systems (SUDS) and Guidance on SEPA engagement with the development plan process. Para 2.3 of SEPA Guidance Note states "Full and early engagement at all stages, including the production of supplementary guidance, allows our interests to be fully considered when the plan is formulated so that we can support development proposals at planning application stage."</p>

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Customer/ Organisation	Verbatim Comments
	<p>There is no evidence that SEPA have been involved with the preparation of the Inshes and Raigmore development brief. It is evident that the appropriate design development steps to assess the risk (SFRA), then promote flood risk avoidance and only when the risk is unavoidable, to mitigate and manage the risk, so that finally the principles of the development can be established do not appear to have not been followed.</p> <p>Although a SFRA is only recommended as an assessment tool that absence of any assessment invalidates the approach to flood risk management in the Inshes and Raigmore development brief. Furthermore the Inshes and Raigmore development Brief does comply with the guiding principle to achieve no net detriment to the existing surface water drainage regime and attendant flood risk as the natural surface water drainage into and from my property will be affected by the proposed road construction earthwork embankments infilling the adjacent land.</p> <p>My property and neighbours are not connected to the local foul sewer drainage system and consequently when there is flooding in the area the effectiveness of the septic tank soak away is diminished. My garden soak away is reliant on natural groundwater seepage through the cohesionless soil type into the area where the proposed new road embankments are proposed and therefore it is inevitable that there will be a net detriment to the natural surface water and ground water seepage will be restricted which will affect my property. It is imperative that a SFRA must be undertaken and due consideration of how to avoid unacceptable risks. It is important to highlight that this topic is current and of great concern as on 8th October the Dell Burn again overflowed its banks at the entrance to the twin pipe culvert under the B9006.</p> <p>This resulted in extensive flooding into the open field adjacent and into my property and a neighbouring property (photos available). This is the second time in the last few years that the Dell burn has overflowed causing extensive flooding, therefore there is an existing very high flood risk which is recognised in SEPA's flood risk maps. Therefore I highlight that the continued pursuance of any development in this area must be undertaken in accordance with the SEPA Interim Position Statement on Planning and Flooding dated July 2009 which states "the cornerstone of sustainable flood management is the avoidance of flood risk in the first instance". Therefore I strongly recommend that due consideration is given to reconsider any plan to develop the Dell of Inshes site as any development will only increase the already very high flood risk in the area.</p> <p>Indeed the Flood Risk Management (Scotland) Act 2009 places a duty on responsible bodies such as Local Authorities to exercise their functions with a view to reducing overall flood risk. Therefore it is important for any proposed built environment to work with the water environment and not against it by steering new development away from areas at unacceptable risk of flooding and by requiring development consideration of how a development is likely to impact on flood risk elsewhere.</p> <p>Managing flood risk and surface water is a material consideration for any development which should be assessed from the outset by a qualified, competent and experienced professional. The location, layout and design of new developments are the most critical factors determining both the probability and impacts of flooding. It is noted that Scottish Planning Policy (SPP) and the Councils planning policies aim to avoid and reduce flood risk in exercising planning functions.</p>

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Customer/ Organisation	Verbatim Comments
	<p>SPP states that ‘Planning authorities must take the probability of flooding from all sources – (coastal, fluvial (water course), pluvial (surface water), groundwater, sewers and blocked culverts) and the risks involved into account when preparing development plans and determining planning applications’</p> <p>The Councils general policy on Flood Risk (Policy 64) requires avoidance of flood risk areas, specifies when a flood risk assessment will be required and promotes sustainable flood management measures. In addition, the Councils policy on Surface Water (Policy 66) Drainage requires all developments to adhere to accepted technical SuDS requirements.</p> <p>Policy 64 Flood Risk</p> <p>Development proposals should avoid areas susceptible to flooding and promote sustainable flood management. Development proposals within or bordering medium to high flood risk areas, will need to demonstrate compliance with Scottish Planning Policy through the submission of suitable information which may take the form of a Flood Risk Assessment. Development proposals outwith indicative medium to high flood risk areas may be acceptable.</p> <p>However, where:</p> <ul style="list-style-type: none"> • better local flood risk information is available and suggests a higher risk; • a sensitive land use (as specified in the risk framework of <i>Scottish Planning Policy</i>) is proposed, and/or; • the development borders the coast and therefore may be at risk from climate change; <p>A Flood Risk Assessment or other suitable information which demonstrates compliance with SPP will be required. Developments may also be possible where they are in accord with the flood prevention or management measures as specified within a local (development) plan allocation or a development brief. Any developments, particularly those on the flood plain, should not compromise the objectives of the EU Water Framework Directive. Where flood management measures are required, natural methods such as restoration of floodplains, wetlands and water bodies should be incorporated, or adequate justification should be provided as to why they are impracticable.</p> <p>Policy 66 Surface Water Drainage</p> <p>All proposed development must be drained by Sustainable Drainage Systems (SuDS) designed in accordance with The SuDS Manual (CIRIA C697) and, where appropriate, the Sewers for Scotland Manual 2nd Edition. Planning applications should be submitted with information in accordance with <i>Planning Advice Note 69: Planning and Building Standards Advice on Flooding</i> paragraphs 23 and 24. Each drainage scheme design must be accompanied by particulars of proposals for ensuring long-term maintenance of the scheme.</p>

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Customer/ Organisation	Verbatim Comments
	<p>The Council also has a responsibility to undertake the following:</p> <ul style="list-style-type: none"> • Preparation of maps of water bodies and SuDS • Assessing water bodies for conditions likely to pose a flood risk • Undertake maintenance works in water bodies including the clearance of watercourses where the works will significantly reduce flood risk • Maintenance of existing flood alleviation schemes • Planning policy and development management (with flood risk advice from SEPA in the first instance and TEC Services) • Preparation of local Flood Risk Management Plans (from 2012) • Local Authorities also have powers to promote new flood alleviation schemes where these can be justified and funding is available. <p>Drainage Impact Assessment</p> <p>Drainage is a material consideration at the planning stage of a development and due consideration must be given to the impact of the proposed development elsewhere. This includes an assessment of potential from both a water quantity (i.e. flood risk) and water quality (i.e. pollution) perspective.</p> <p>The DIA should demonstrate that the surface water drainage system takes account of SuDS principles and specifications in accordance with current legislation and guidelines such as the CIRIA Publication C697 - The SuDS Manual.</p> <p>A sensitivity test to ensure that there is no flooding to property or critical roads during a 1 in 200 year return period rainfall event is also required. The 1 in 200 year event should be contained on-site (unless it can be demonstrated that the 1 in 200 year event could be managed appropriately without causing a flood risk elsewhere) and information requires to be provided demonstrating how this will be achieved. A flood routing exercise needs to be undertaken clearly illustrating where flood water generated by such extreme events will be routed to on-site.</p> <p>With regards to ponds and detention basins the DIA should demonstrate a safe mechanism for overtopping within these features should the design capacity be exceeded during extreme rainfall events. Overtopping of these features must not lead to flooding of property or critical infrastructure and preferential flood flow paths should be identified in the event of overtopping.</p> <p>Information should be provided on the anticipated drain down time for any attenuation facilities. The SuDS Manual CIRIA C697; notes that storage should drain down from full to empty within 24 to 48 hours. If the drain down time is more than 24 hours, then long duration events should be assessed to ensure</p>

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Customer/ Organisation	Verbatim Comments
	<p>that the storage is not overwhelmed by long periods of rainfall or consecutive high intensity storm events.</p> <p>It is noted that the Council is still in the process of developing Local Flood Risk Management Plans which will determine a catchment-based approach to reducing overall flood risk. Opportunities to return bodies of water to their natural drainage capability will be explored e.g. de-culverting watercourses where possible through the planning process, provided flood risk is not increase elsewhere as a result. It should also be noted that the Council supports SEPA's presumption against culverting for land gain.</p> <p>Therefore the requirement for further flood risk and drainage assessment work to assess the Poilcy 7guiding principle to acheiev no net detriment to the existiung surface water drainage regime and attendant flood risk in support of the Inshes and Raigmore development Brief is clear and undeniable. The Council have a requirement to undertake a Flood Risk Assessment as well as a Drainage Impact Assessment to provide the necessary level of detail required to support the supplementary guidance proposal.</p> <p>Reason for Rejection, Point 4: The Inshes and Raigmore development brief does not present any justification or provide the necessary level of detail to confirm a Strategic Flood Risk Assessment has been undertaken as defined in the SEPA Technical Flood Risk Guidance for stakeholders document, ref SS-NFR-P-002 nor the Councils Supplementary Guidance on Flood Risk and Drainage Impact Assessment.</p> <p>Reason for Rejection, Point 5: The Inshes and Raigmore development brief does not present any justification to confirm any consultation with SEPA in accordance with Land Use Planning System SEPA guidance Notes 2 and 11.</p> <p>Reason for Rejection, Point 6: The Inshes and Raigmore development brief does not present any justification or provide the necessary level of detail to confirm a Drainage Impact Assessment has been undertaken to provide a design bounding criteria for development assessment.</p> <p>Reason for Rejection, Point 7: The Inshes and Raigmore development brief does not comply with the guiding principle to achieve no net detriment to the existing surface water drainage regime and attendant flood risk as the natural surface water drainage into and from my property will be affected by the proposed road construction earthwork embankments infilling the adjacent land.</p> <p>4: Inadequate Supplementary Guidance</p> <p>Para 18: It is stated that the Council has "suggested a limited number of changes" to the site allocations identified in the Inner Moray Firth Local Development Plan. The Inshes and Raigmore Development Brief does not provide any further explanation or discussion on the proposed changes to the Inner Moray Firth Local Development Plan nor provide any confirmation that the requirements for Land at Dell of Inshes, Site reference IN55 as presented in Appendix A have been addressed.</p> <p>It is also stated that the Inner Moray Firth Local Development Plan "will refresh the Highland-wide Local Development Plan and provide more detail on the</p>

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Customer/ Organisation	Verbatim Comments
	<p>use of land. With regards to Site IN55 the requirements are stated as “The Council will produce a masterplan/development brief which it will adopt as supplementary guidance.</p> <p>This will address: the need for completion of and/or land safeguards for, improvements to the trunk road and local road networks prior to development; land safeguard for drainage improvements/safeguards; flood risk assessment (may affect developable area); transport assessment.” It is assumed as it is not stated that the Inshes and Raigmore development brief will address the requirement for a “masterplan/development brief”. It is important to note the use of the term “masterplan” as this infers a strategic level document which the Inshes and Raigmore development brief fails to provide due to the lack of supporting assessments either development need, road demand, flood risk or environmental issues.</p> <p>Furthermore the Inshes and Raigmore development brief does not provide evidence of any defined or detailed assessment criteria to provide a basis to demonstrate compliance against each Site IN55 requirement. It is noted on page 5, para 1.8 that should the Report of examination from Scottish Ministers recommend significant changes to the site allocations contained in the development brief, the brief will be reviewed at an early opportunity. Therefore there is a risk should the supplementary guidance be adopted in advance of the Inner Moray Firth Proposed Local Development plan then any changes recommended by the Scottish Ministers could be too late to be incorporated. It is recommended that the Inshes and Raigmore development brief is not progressed until the Report of Examination from the Scottish Ministers on the Inner Moray Firth Proposed Local Development plan submission currently in due process is received and reviewed by the Council.</p> <p>Reason for Rejection, Point 8: The Inshes and Raigmore development brief does not provide evidence of any defined or detailed assessment criteria to provide a basis to demonstrate compliance against each Site IN55 requirement.</p> <p>Reason for Rejection, Point 9: The Inshes and Raigmore development brief does not present any justification to confirm that the requirements for Land at Dell of Inshes, Site reference IN55 as presented Inner Moray Firth Local Development Plan in the submission to the Scottish Ministers, have been addressed.</p> <p>Recommendation, Point 1: It is recommended that the Inshes and Raigmore development brief is not progressed until the Report of Examination from the Scottish Ministers on the Inner Moray Firth Proposed Local Development plan submission currently in due process is received and reviewed by the Council.</p> <p>5: Natural Constraints Ignored</p> <p>The Dell of Inshes site is mainly enclosed with attractive and valuable mature trees and planting and the area forms part of a key gateway view over the city and beyond. However the Design guidelines presented in Figure 14 indicate the majority of these valuable natural assets are to be removed and replaced with either SUDS ground features or new planting. Indeed it is evident from Figure 14 that significant change would be required to accommodate</p>

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Customer/ Organisation	Verbatim Comments
	<p>the proposed design guidelines. It is inappropriate to claim that these areas are protected in one part of the Inshes and Raigmore development brief and then remove them in another to replace with hard landscaping and new planting. The developer requirements provides little to specifically safeguard the existing green network features and it is therefore considered disingenuous to claim these natural assets as constraints in the supplementary guidance. The identification of trees with preservation orders is not detailed yet several exist in the area and no safeguard provision is claimed. Indeed it is noted that the Design Guidelines conflict with the location of some areas of trees with preservation orders rendering the proposal invalid.</p> <p>The brief shows Built and natural heritage, Water and flood risk and Infrastructure as main constraint headings. It is of concern that the brief overlays all of the plan views with a “proposed” road option which in regard to the area to the East of the Inshes Tesco carpark completely ignores all the identified constraints.</p> <p>Are these really constraints or is the identification of constraints only a token gesture and not considered in the design of any development proposals?. The area of flooding in this area is shown as a limited area but from experience a larger area has been prone to flooding. Details can be provided on request. Additionally the residential properties in this area are all shown to be in areas of potential development. Furthermore not all mature trees are represented in this area. It is stated that “key gateway views over the city must be safeguarded” but again this statement does not appear to have been considered in the design guidelines presented.</p> <p>Reason for Rejection, Point 8: The Inshes and Raigmore development brief does not provide evidence of any defined or detailed provision to protect areas of trees with preservation orders from development.</p> <p>6: Additional burden to local road infrastructure</p> <p>Any proposed development expansion of the Inshes retail park will only generate an additional burden on the existing road network. It is my consideration on review of the previous thwarted planning attempts by a persistent developer who owns the land at Dell of Inshes that the council has been influenced to incorporate in the Highland wide local development plan adopted in 2012 a change of land use from green wedge to commercial use (IN55).</p> <p>This is in spite of concerns raised by residents affected by the significant change in land use especially as the site is surrounded by residential properties, fields or local access roads. Although requirements have been set to produce a masterplan/ development brief and identifies required safeguards it is concerning that none of the safeguards have been demonstrated to have been considered in the information provided in the briefing material provided. Most notable is the absence of recent traffic survey information and the lack of SEPA engagement to prepare a strategic flood assessment plan as stated earlier.</p> <p>This information is vital to determine the site constraints and limit the developable boundary for the areas under consideration. Furthermore the A9/A96 Connections Study by Transport Scotland is equally flawed as it appears to utilise the same traffic data generated in 2009 and prior to many new</p>

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Customer/ Organisation	Verbatim Comments
	<p>developments taking place and also noting the information was prepared as a strategic level assessment as it was generated to support the IMFLDP.</p> <p>For consideration of this development plan an accurate model is required and a transport plan proposed to address the future transport needs to at least the same time period as considered under the IMFLDP. Note the transport report generated for the IMFLDP identified future concerns with the Raigmore / Culloden road network and consideration of suitable investment is made once rather than the example of “Sir Walter Scott Drive” where failure to dual on construction and reliance on developer contributions has led to inconsistent road infrastructure and arguably the need to implement piecemeal improvements including the latest plan to upgrade the Inshes roundabout and Old Perth road connections.</p> <p>The “outline proposals” presented in the development briefing material indicate up to 5 signal controlled junctions from the Inshes A9 overbridge to the Fluke roundabout which due to the short queue length available and if not synchronised may lead to blocking of crossing traffic and subsequent short cycle times to clear right turning traffic. Additionally each junction would probably include a pedestrian phase on demand which would also increase the traffic retention period which would also need to be factored into the travel time improvements proposed.</p> <p>On study of the traffic movements at the current Inshes roundabout it is noted that pedestrian movements are limited to crossing the B8082 only. Pedestrian crossing exist on each side of the roundabout on the B9006 but a considerable distance from the roundabout. Only the pedestrian crossing to the East of the roundabout is heavily used as it serves the bus-stop on the East bound lane of the B9006 as well as the main pedestrian access to and from the Beechwood Business park.</p> <p>These pedestrian crossings appear to be retained and incorporated in the outline proposals. It has been observed that crossing pedestrian traffic is a significant contribution to the pulsing streams along the B9006 which enter the Inshes roundabout and restrict exit from the Inshes retail park until the traffic has cleared.</p> <p>This pulsing is caused by a combination of the pedestrian crossing signal and the signals at the Inverness Campus entrance. However at peak times the B9006 West bound traffic backs up over the Inshes overpass and the only break in the traffic is when the pedestrian crossing is in use. The proposed outline proposals indicate a new elevated access road to the B9006 from the Inshes Retail park the position of which lines over an area of flood risk which impounds annually which includes an area including my property.</p> <p>It is my view that the proposed new access road would only compound and increase the current flood risk to my property which is unacceptable as it is contrary to the first principle of flood prevention and that is avoidance. It is also contrary to the aim of the IMFLDP not to increase the flood risk. Additionally the flood attenuation basin system proposed covers an area currently tree lined and forming an attractive border to the Inshes retail park and the residential and agriculture area immediately to the East.</p> <p>This is contrary to the proposal to safeguard key views. The proposal also isolates the Tesco filling station and provides a new junction to the proposed</p>

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Customer/ Organisation	Verbatim Comments
	<p>new access road. Across from the filling station junction is proposed an elevated junction which would lead to my property but there is not recognition of the existing tree lined border to my property in this elevation.</p> <p>It is concerning that the proposed new access road and junctions would be on an incline and an elevated embankment adjacent to my house with potential loss of privacy and amenity.</p> <p>The outline plans also identify a link to the A9/A96 connection along with an indicative arrangement for the retail park roundabout which would destroy any remaining existing avenue of trees which is again contrary to the proposal to safeguard key views. It is recommended that further traffic surveys are undertaken to determine the actual current demand and future modelling and a transport assessment is prepared.</p> <p>Reason for Rejection, Point 9: The Inshes and Raigmore development brief does not provide evidence of any defined or detailed provision to ensure no net detriment to the existing traffic management arrangements at Dell of Inshes.</p> <p>7: No local demand for an expanded District Centre</p> <p>Page 19, para 2.18 states that the key aims of the Dell of Inshes site are to expand the range of services available to local communities. However there is no evidence to neither confirm nor justify there is any demand for an expanded district centre and the Councils stated preferences are inconsistent with current planning policy for the Inshes retail site. The Inshes residential area is well served with local convenience stores as well as the existing retail park. The Council proposes that the South end of the retail park is completed first before Dell of Inshes but both are stated to be within the Inshes District Centre. The use of this terminology is contradictory as in Dell of Inshes Convenience retail food is expressly excluded but this is the only existing development in the existing nominated Inshes District Centre. There is no need to develop the Dell of Inshes land area when the area to the South of the Inshes Retail park is ideally located to provide the necessary provision. Therefore the Dell of Inshes need not be developed and the supplementary guidance proposal amended to reflect that this area is given protected from development status.</p> <p>Reason for Rejection, Point 9: The Inshes and Raigmore development brief does not require to include the Dell of Inshes site for development as a district centre as existing undeveloped land existing within the Inshes retail park and adjacent to the Inshes Residential area.</p>
A Kidd	<p>I wish to comment on the Development Brief, firstly the brief has a clearly defined boundary yet much of the content talks about areas that are out with the boundaries of the Development Brief, Raigmore Hospital entrance, Fluke Roundabout, Inshes Overpass and Inshes Junction (UHI). The Development Brief also mentions Transport Scotland's 3 proposals for the A9/A96 link Options B,C and D, when Transport Scotland clearly have 4 options which include Option A. Transport Scotland admitted at the public consultation events that it had been a mistake to mention on its paperwork that Option A was unlikely to go ahead. I would urge the council to lobby Transport Scotland to proceed with the only option that links directly the A9/A96 in both directions, which is Option A as none of the others provide a direct link in both directions, an amended version of Option A to single carriageway would be the best option for</p>

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Customer/ Organisation	Verbatim Comments
	<p>Inverness and its people. The councils proposals for phase 2 at inshes defy belief, as it is well documented that a 4 way junction would introduce potentially fatal T-Bone collisions, which do not occur at roundabouts. The Development Brief proposal to replace Inshes Roundabout with a way junction goes against all the design guidance available, making the intersection far more dangerous, less environmentally friendly and less efficient at dealing with traffic. Firstly I would strongly recommend that the existing roundabout is altered from a 6 leg roundabout to a 4 leg roundabout, this could easily be achieved by making the Police and Tesco's legs access only, this would improve traffic flow greatly and cause almost do disturbance with minimal cost. Secondly I would remove all the 6 pedestrian/cycle crossings from the roundabout and provide a pedestrian/cycle bridge this would improve greatly the pedestrian/cycle experience and totally separate cyclists and pedestrians from the traffic which would massively improve safety. I have researched a similar junction in Holland which has a cycle/pedestrian elevated roundabout a similar idea could be utilised and would be a fantastic entrance into Inverness on the Route 1 Cycle way. http://bicycledutch.wordpress.com/2012/08/23/spectacular-new-floating-cycle-roundabout/ The money saved from the minor changes needed to alter the roundabout to 4 leg against providing a new 4 way junction would be better spent on providing Inverness with a truly state of art floating Cycle/Pedestrian Bridge, the result would be a safer, greener, environmentally friendly and more efficient intersection, the councils proposal would make the existing situation more dangerous less efficient and far less environmentally friendly.</p>
R MacLennan*	<p>Would insist on improving links and access to the SDR. Providing a direct link to the SDR, and reducing the amount of roundabouts at Inshes Retail Park will help traffic flow for 'East Link' through-traffic.</p>
J McEwen and W Sprunt	<p>Having suffered severe flooding in 2002, water and flood risk and prevention is of primary concern. 1. Policy 7, page 4 of the Brief should read 'to achieve net enhancement to the existing surface water drainage regime and attendant flood risk'. The flood risk maps, page 6 of teh Brief, show old Perth Road as currently and worryingly subject to medium risk of surface water. QUESTION Old Perth road drainage system is an antiquated and out-dated combined water/sewage system and Highland Council's drain/gully cleaning programme is an inadequate duty of care once a year regime.How and where will water/sewage from any development be accommodated? 2. All hard surfaces from any development - roads, pavements, cycle paths etc should be of permeable materials. QUESTION ill Highland Council ensure this is an enforced planning condition of any consent?3. The flood attenuation basin as portrayed on page 7 of the Brief seems small in comparison with the size of the Dell of Inshes site development potential. QUESTION Can/ will the basin be increased/extended as necessary?</p>
Graham and Sibbald (Acting on behalf of Mr & Mrs Grant, per K McGuire)*	<p>Draft Inshes and Raigmore Development Brief – Land South of Police Scotland</p> <p>We write on behalf of our clients Mr and Mrs Grant in relation to the current consultation for the Draft Inshes and Raigmore Development Brief. Our client owns the land to the south of Police Scotland Headquarters at Sir Walter Scott Drive.</p> <p>As stated at the Issues and Options consultation stage, we welcome the preparation of the Development Brief and the opportunity to comment on the</p>

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Customer/ Organisation	Verbatim Comments
	<p>proposals.</p> <p>We continue to promote the extension of the boundary for the Development Brief Area on the western side of Sir Walter Scott Drive. The enclosed plan identifies the area proposed for inclusion within the Development Brief boundary. This is marked on the plan in red hatching. This land is within our client's ownership and they have been promoting their land as a development site for business use through the Inner Moray Firth Local Development Plan. At the Main Issues Report Consultation Stage, The Highland Council recognised that the area of land currently outwith the Development Brief boundary, provides no amenity value and is commercially viable. The inclusion of this area will ensure that this area of land is developed and maintained in accordance with the principles of this Development Brief.</p> <p>Land South of Police Scotland</p> <p>Paragraph 2.23 of the Development Brief details that: "The Council's preference is for this site to be utilised for future expansion of Police Scotland at this location. However should Police Scotland confirm this site is not required for expansion purposes, alternative proposals for business development may be acceptable."</p> <p>Our client fully supports the flexibility within the Development Brief for this site to be developed for business use, should it be surplus to Police Scotland's requirements.</p> <p>Our client also fully supports the Council's aims for this site in terms of enabling business expansion and creation of employment opportunities.</p> <p>Paragraph 2.24 of the Development Brief details that subject to confirmation regarding any future Police Scotland intentions for the site that Class 4 (business) use would be acceptable. This use is acceptable to our client and is fully supported by them.</p> <p>Our client is in agreement with the Design Guidelines identified in Figure 19 of the Development Brief, which seek to maintain the existing building line, create an attractive landscaped setting for any future development and improve walking and cycling links to Inshes Retail Park.</p> <p>Figure 19 identifies that the vehicular access would be via an extension to Police Scotland's access. The Development Brief identifies that this site can be developed for business use, should it be surplus to Police Scotland's requirements. We consider that this flexibility should also be applied to the access arrangements. It is requested that the Development Brief clearly indicates that the vehicular access arrangements currently shown on the Design Guidelines relate specifically to the use of the site by Police Scotland. It is requested that the Development Brief indicates that, should the site be developed for business use then the access arrangements should be agreed with The Highland Council prior to any application being submitted.</p> <p>The Developer Requirements for this site are set out in the table in paragraph 2.26 of the Development Brief.</p>

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Customer/ Organisation	Verbatim Comments
	<p>The Key Requirements detail that any land required for the provision of Inshes Junction Improvements Phase 2 Outline Proposals, including flood alleviation (or any subsequent iterations), is to be safeguarded from development and transferred to the Council at nil cost.</p> <p>The transfer of any land required for junction improvements at nil cost is wholly unreasonable and strongly opposed by our client. This land is in private ownership and if the land is required for Junction Improvements then the Council will have to enter into negotiations with our client or compulsory purchase the land.</p> <p>This table sets out the supporting documents that should accompany any application submitted.</p> <p>The Development Brief indicates that a Transport Statement would be required for this site. Given the size of the site, a full Transport Assessment would not be required and we request that this is amended to a requirement for a Transport Statement to be provided.</p> <p>Monitoring and Review</p> <p>The Development Brief indicates that this brief has been prepared in advance of the finalisation of the following projects/plans:</p> <ul style="list-style-type: none"> • Inshes Junction Improvements Phase 2 • Transport Scotland A9/A96 Connection Study • Outcome of Examination of inner Moray Firth Proposed Local Development Plan <p>We request that the Development Brief includes some indicative timescales for the completion of the above projects/plan and an indication of when this Development Brief will be reviewed.</p> <p>We also request that our client is kept up to date of any revisions to this Development Brief and in particular any decisions taken in relation to land requirements for the Inshes Junction Improvements.</p> <p>Please find enclosed the completed Feedback Form. We trust that the above comments will be taken into consideration in the preparation of the Inshes and Raigmore Development Brief.</p> <p>Should you have any queries or require any additional information, please do not hesitate to contact me at the telephone number below.</p>
A Menzies	<p>There is already storm/sewage drain interaction and flooding taking place at Culcabock. I emphasise again, this is affecting my property with a detrimental effect on my health and well being. Scottish Water are aware of this. So, too, are you. Should this problem not be addressed first before any further developments could potentially exacerbate the existing problems caused, in my opinion, by neighbouring developments condoned by you in the recent</p>

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Customer/ Organisation	Verbatim Comments
	past.
M Munro	<p>I read in this weeks Inverness Courier that the council begins consultation on Inshes blackspot.</p> <p>I have lived at Westhill for the past twenty four years and have found the increase in traffic quite distressing.</p> <p>There are two factors which contribute to this.</p> <p>One. You have given planning permission for thousands of houses to be built in the area. Each household has at least one maybe two cars.</p> <p>Two. The pedestrian crossing from Tesco filling station to the bus stop. This is used continually by shoppers and workers from the Beechwood business park crossing to work in he morning, at lunch time and again in the evening.</p> <p>Could this be removed and an underpass installed? I have travelled this road for many years observing the cause of tailbacks of traffic. I have also travelled in many countries where underpasses are used extensively.</p> <p>Why not at Inshes roundabout?</p>
GH Johnston Building Consultants Ltd (per A Ogilvie)*	<p>Overall I am disappointed with the Council's responses to comments made on the previous version of the Draft Brief. I now make comments on the latest Draft Brief which draw upon my previous comments and concerns. Section 1. Introduction - Constraints Paragraph 1.18 on page 9 refers to Tree Preservation Orders and 20 metres buffer of trees. However, this safeguard does not seem to transfer through to proposals indicated in other parts of the brief, notably to the enlarged roundabout adjacent to Woodgrove. 2. Development Framework # Figure 7: Opportunities Overview (page 11) This is missing the active travel /green network enhancement opportunity to connect to the Inverness Retail and Business Park, via the Campus. In the response to my comments on the previous draft it was stated that "whilst East Inverness does lie outwith the brief area, it is important that effective connections to East Inverness are maximised as part of the wider active travel network." Then "The limitations of Raigmore Interchange to active travel are acknowledged. Funding has recently been awarded to provide a walking, cycling and public transport link between Inverness Retail Park and the new Inverness Campus which is anticipated to improve public transport and active travel connections." I am aware that the owner of the Inverness Retail Park may not be prepared to accommodate this link, which will close down options. As such, alternatives be explored along with improvements to make the Raigmore Interchange more pedestrian and cycle friendly. # Figure 8: Walking and Cycling Improvement Opportunities (page 13) (a) This is missing an obvious link from the Drakies Buffer area into the cul-de-sac of Drumossie Avenue (121 to 151). (b) The walking/cycling opportunities indicated around the proposed ("indicative") roundabout will be grossly impeded by the provision of a major road link to the A9 and A96. The provision of a new pedestrian/ cycle crossing option on this leg of the proposed roundabout will not be attractive to pedestrians and cyclists given the potential large volume of vehicular traffic that might use it. (c) The yellow star symbol at the existing crossing of Old Perth Road to Raigmore Hospital opposite Drakies Avenue should be changed</p>

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Customer/ Organisation	Verbatim Comments
	<p>to an orange star. There is a long established need to improve this crossing, particularly to allow access by all users from the Drakies area. # Figure 14: Dell of Inshes Design Guidelines (page 21) The proposed (“indicative”) roundabout and route option under consideration as part of the Transport Scotland A9/A96 connections study will: (a) result in a significant increase in the amount of traffic in the area; (b) sever the Dell of Inshes Farm area from the existing built up area affecting the development \conversion potential of the farm buildings and adjoining vacant land; (c) have a significant detrimental noise and visual impact on adjacent residential properties; and (d) result in loss of significant trees of local landscape value. # Land South of Police Scotland (a) In paragraph 2.23 on page 25, I object to the statement “However, should Police Scotland confirm this site is not required for expansion purposes, alternative proposals for business development may be acceptable”. This ignores the planning policy history of the area which clearly allocated the land for just expansion of the Police HQ/offices. I would also expect that for operational reasons Police Scotland is unlikely to allow development by another user taking access through its site. If the Council remains consistent with its long held standpoint then further direct access on the Southern Distributor road will not be permitted. (a) In paragraph 2.26 on page 27 a key Transport and Wider Access developer requirement is that “access must be compatible with Inshes Junction Improvements Phase 2” etc. This needs to be clarified with a further statement to the effect that development will not be permitted until these works are carried out. In particular the connection between the existing roundabout and Drumossie Avenue must be closed off. This is important given the impact from a history of rat-running traffic (contrary to the Access Restriction Order – illegally therefore) along this section of a residential access road by extraneous traffic, including by vehicles travelling to and from the Police offices. (c) Then on page 28, in relation to the Water Environment requirement that watercourses should not be culverted as part of new development, it is suggested that there should be a requirement to check existing nearby watercourses. In particular consideration should be given to the effect of the part culverting of the watercourse running along the rear of houses in Drumossie Avenue by one of the householders about 12-14 years ago. Appendix B: Inshes Junction Improvements Phase 2 Outline Proposals Although the consultation is not on the details of the Outline Proposals there are two factors I wish to raise relative to points I make above on the provisions of the Draft Brief. These are as follows: - (a) The full closure proposals for the Perth Road residential access slip road will impact on the residential amenity of householders at the north end of the Drakies Estate, notably in Balvonie Avenue, Eastfield Avenue and Cuthbert Road. Forcing all traffic to access or exit via the new junction of Drumossie Avenue with Old Perth Road will also inconvenience many residents living on the latter and in Drakies Avenue. It would be better to leave the west (Raigmore Motel) end of the residential slip road open to vehicular traffic but still close off the east end where it joins Drumossie Avenue as well as the section between Drumossie Avenue and the Inshes roundabout. (b) With the above arrangements for Old Perth Road residential slip road in place this would allow a change of priority at the Drakies Avenue junction and the introduction of a ramped path connection to the crossing of the main Old Perth Road to and from Raigmore Hospital. Additional Designing Streets style measures around the re-prioritised residential access junction would further improve pedestrian/cycle safety in this area. Please see attached sketch which illustrates this point and which I ask be explored further as part of the Inshes Junction Improvements.</p>
Scottish Water (per W Patton)	Draft Inshes and Raigmore Development Brief Scottish Water welcomes the opportunity to comment on the above guidance to be incorporated as Supplementary Guidance for the respective sites

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Customer/ Organisation	Verbatim Comments
	<p>constituting the Inshes and Raigmore Development Brief. Scottish Water will work closely with Highland Council and developers to enable delivery of new development, which will primarily be focussed within the remaining land parcel at the Eastern edge of the Inshes Retail Park and the expansion site adjacent to Police Scotland. In addition to the comments previously provided to the Highland-Wide Local Development Plan, the following information may be useful in providing further clarification on current treatment capacity and network requirements.</p> <p><u>Inshes Retail Park</u></p> <p>To date, the existing retail site has not experienced any significant network problems in terms of drainage. However, this retail development has been in operation for a significant period of time now and as such information from modelling and drainage studies carried out at the time of construction will now be significantly out-dated.. It is most certainly a requirement, that up to date network modelling studies should be undertaken by the developer, to ensure that any additional demands and flows arising from the development do not have a detrimental effect on existing retail units on site as well as the residential area neighbouring the site itself. Additionally, since development of the retail park began, a significant number of residential properties have been built to the Southern edge of the development area, adding to the foul flows through the existing network. As the future expansion site to the East is green-field, dependent upon the final make-up of the proposed development, it will be necessary for developers to provide on site mains extensions to service their requirements, as with any new development of this nature. It is therefore recommended that developers contact Scottish Water as early as possible to ascertain the specific requirements for any such network investigations, in line with the nature of the proposed development itself, which may inform their final on-site drainage layouts. It will be a requirement that all surface water from the development should be collected via a separate system on site with resulting surface flows being dealt with via an appropriate SUDS system.</p> <p><u>Police Scotland</u></p> <p>Whilst there is a presumption within the plan that this site may at some point be utilised for expansion of the exiting Police Scotland campus, it is anticipated that the additional demands on water and waste water services will not present a significant increase to that of the current demand. However, as and when any future usage is agreed and finalised, the appointed consultants should contact Scottish Water to discuss any requirements for network modelling and any mitigation measures that may result from the proposed final layout and usage specifics. Alternatively, should Police Scotland confirm that this site does not relate to any future expansion plans, we would ask that the Council make contact with Scottish Water to confirm this and to provide details of any alternative land class usage.</p> <p><u>Raigmore Hospital</u></p> <p>Scottish Water acknowledges that NHS Highland has confirmed their commitment to maintaining Raigmore Hospital Campus on the current site and that any reconfiguration on site is significantly limited by the provision of Helipad services.</p> <p>Should any reconfiguration or changes to existing buildings and services be proposed at any point in the future, which may require the movement of water and waste water services or increasing in demands of flows, we would strongly encourage NHS Highland or any appointed Development Consultants to</p>

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Customer/ Organisation	Verbatim Comments
	<p>make contact with Scottish Water to informally discuss these matters or alternatively via their appointed Licenced Provider.</p> <p><u>Connections Process</u> Since 1 April 2008, all businesses, public sector, charitable and not-for-profit organisations have been presented with a variety of water and sewerage suppliers to choose from. These suppliers are called Licenced Providers (LP's) and more information on this process can be found at www.scotlandontap.gov.uk.</p> <p>As the sites detailed within the Inshes and Raigmore Development Brief are non-domestic in nature, any resulting applications for connections to the water and waste water network should be carried out via one of the approved LP's operating in Scotland.</p> <p><u>Early Engagement in Planning</u> We would also like to take this opportunity to acknowledge the Council's consistent message of recommending that developers have early engagement with Scottish Water to ensure any network and investment requirements that may be required, are discussed at an early stage to allow for timely planning and delivery by both Scottish Water and the developer themselves.</p> <p>In the meantime, should you require any further information, please do not hesitate to contact us.</p>
Pritchett Planning Consultancy (on behalf of SWIPPT, per P Pritchett)	<p>This report contains the comments submitted on behalf of Scottish Widows Investment Partnership Property Trust in respect of the Draft Inshes and Raigmore Development Brief. The comments are as follows:</p> <p>1.0 PAGES 8 and 9, CONSTRIANTS, FIGURES 5 and 6</p> <p>1.1 Under the heading 'Constraints' various physical constraints are identified and in figures 5 and 6 these are indicated in plan form. However, the plans have the proposed new road proposals indicated as a base and not the existing situation. This is confusing to the reader as this section of the brief comes under the overall heading of 'Area Analysis'. These figures should therefore be based on the existing situation.</p> <p>1.2 The figures are misleading as figure 5 indicates that there are trees within the southern section of Inshes District Centre which is not the case. The legend indicates that the light green shading is a 20m buffer from trees, but this appears to be inaccurate. In addition the base plan being used for this figure has the proposed new road added in the northern part of Inshes lying between Tesco and the Dell of Inshes. This proposed new road (the details of which are indicated later in Appendix B) together with the flood alleviation measures are likely to result in the removal of many if not all of the trees along the existing north/south link road. If tree buffers are deemed to be a constraint on development then they should be accurately plotted and the constraints map should be based on the existing built form.</p> <p>1.3 The constraints figures should also take account of the fact that there is an existing planning permission in existence at the southern end of Inshes</p>

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Customer/ Organisation	Verbatim Comments
	<p>District Centre which should be acknowledged as an existing commitment. There should not be any constraints indicated within this development zone as the consent is partially developed.</p> <p>1.4 In respect of water and flood risk the use of a base map which includes a new road layout and flood alleviation area is misleading as the text indicates where existing potential issues may arise, but such constraints will inevitably change when new road building and flood attenuation measures are in place. The base map should therefore be altered to indicate the existing situation.</p> <p>2.0 INSHES RETAIL PARK SOUTH</p> <p>2.1 In paragraph 2.15 it notes the extant planning permission on the southern section of Inshes It states that the guideline principles in figure 11 are expected to be delivered as part of the current planning permission or any alternative development proposals. However the principles set out would not allow the extant planning permission to be completed, but this scenario could arise at any time as the consent lasts in perpetuity as it has been commenced through the completion of the Dunelm retail warehouse. The brief should make it clear that the existing planning permission can be completed at any time and cannot be restricted by the terms of the brief.</p> <p>2.2 In paragraph 2.15 it states that the council requires the existing district centre to be completed prior to any expansion of the retail park at Dell of Inshes. In this regard it should be noted that there are leases in place in existing units at the southern end of Inshes. There is one existing occupier on the site and the existing planning permission was granted with restrictive user clauses in very different economic and retail circumstances. There are therefore external economic and retail factors which will dictate when and whether the existing consent or alternative schemes come forward.</p> <p>2.3 At present Dell of Inshes is in the same ownership as the southern part of the existing district centre. However, this may not always be the case. There are also valid planning and accessibility reasons why it is pertinent to allow both Dell of Inshes and the southern end of the centre to be developed as market circumstances allow. If the council wishes to complete the accessibility and capacity improvements at Inshes roundabout and which will require land outwith the council's control it would not be prudent to restrict the timing of development on land at Dell of Inshes as this is not based on the development plan policy. It should also be noted that Dell of Inshes also includes land on which the council is seeking to provide road improvements. These road improvements will provide access into Dell of Inshes for development. Such development should not be tied in any way to the completion of the southern section of Inshes District Centre.</p> <p>2.4 Figure 11 identifies the southern area of Inshes which includes Harry Ramsdens which is an operational unit. The site plan can only therefore be indicative and the brief should note this. The figure indicates that the rear building line of the retail warehouses should be maintained. There is no reason given for this restriction particularly as it relates to the rear of the buildings. At present it is not possible to know whether any new retailers will require additional rear storage or retail space and the existing servicing area is very generous which allows for a variety of unit sizes. Retailers will consider the visibility and accessibility of the store frontages to be of critical importance, but there are areas to the rear which are entirely functional. The brief should not seek to restrict legitimate and potentially necessary floorspace at the rear of the buildings as long as adequate servicing areas can be maintained. It is accepted that there is a 20m landscaped/tree buffer at the western edge of the site and this will be maintained. The brief should therefore only make reference to this restriction.</p>

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Customer/ Organisation	Verbatim Comments
	<p>2.5 The figure indicates that there could be a potential new walking and cycle link between the retail park and Sir Walter Scott Drive and a defined link is suggested. This link is not feasible or desirable as it is not a current desire line and does not link two points of interest for pedestrians or cyclists. It would also require the crossing of the service yard which is now the only service route for all of the retail units in the centre including Tesco and Dobbies. The route would therefore be dangerous bringing pedestrians and cyclists into conflict with service vehicles. Cycle and pedestrian routes should be around the centre linking nodal points and on existing or future desire lines. The potential route and its associated landscaping should therefore be deleted from the figure.</p> <p>3.0 DELL OF INSHES</p> <p>3.1 In 2.18 the brief states that the Inshes Retail Park south should be completed prior to any development at Dell of Inshes. For the reasons explained above, this reference should be deleted.</p> <p>3.2 Figure 14 provides a graphic illustration of the Design Guidelines for the land at Dell of Inshes. The key to the figure provides a large number of prescriptive elements which could severely curtail the overall development potential of the site in addition to the already significant encroachment into the site if the council's preferred road improvement option is taken into account.</p> <p>3.3 The key views indicated on figure 14 are different from that on figure 5. It should also be noted that from the southern view point this is in a location where there is potential major road infrastructure proposed incorporating over bridges which will significantly alter the views of Inverness when entering the city from this direction. The notes on the key view B require to be considered in this context.</p> <p>3.4 On the key to the figure a green shaded area is noted as 'visually attractive landscaping'. This is a very large area and does not take account of site topography or the extent of the views into this area either at present or in the future when major new road infrastructure is in place. The figure also states that built form should not encroach on the green edge.</p> <p>3.5 This green edge is not an 'edge' to the site but a very extensive zone of green space which will serve no useful purpose. The development of the site can utilise the existing topography to ensure that the built form sits comfortably within the landscape and, with peripheral landscaping of up to 10 metres, there is sufficient land to ensure that key views are protected and enhanced. The extent of green edge indicated on the figure should be removed and replaced with the orange shading indicating the area for community use including allotments, open space and high quality landscaping.</p> <p>3.6 Figure 14 includes graphics across the site for active ground floors and spill out space for outdoor uses. These graphics are located within the centre of the site and whilst it is acknowledged that these graphics are likely to be indicative, at this stage it is difficult to envisage any form of development on the site which would have frontages or spill out space in this location. If such comments are necessary in the brief then these should be mentioned in the text in some form but not graphically indicated on the plan.</p> <p>3.7 In the table under paragraph 2.22 the phasing requirement should be deleted as noted in comments above.</p>

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	<p>3.8 In the table under paragraph 2.22 the Transport and Wider Access note which requires all land required for the provision of Inshes Junction Improvements Phase 2 Outline Proposals to be transferred to the council at no cost should be deleted. There is no statutory or planning basis for demanding privately owned land to be transferred into public ownership for no value. Compulsory purchase procedures are a well established and legally sound process for valuing land required for public works and would be the appropriate mechanism for transferring such land in this instance. The Brief must follow the policies within the development plan and there is no such provision within the development plan. This requirement should be deleted from the brief.</p> <p>3.9 The table also requires all costs of additional consents, order and legal agreement to be reimbursed to the council. It is not clear which additional consents or orders will be required in order to allow development of Dell of Inshes to proceed. It is accepted that council's legal costs for any section 75 agreement associated with the grant of planning permission would be required to be paid for by the applicant. However, the reference to 'additional consents' and 'orders' is unclear and open ended. Clarification is required or such references should be deleted.</p>
J Shankland*	<p>Pedestrian crossing opposite Inshes Church, if moved along towards line of boundary between church and "playgroup" building would give better view of traffic from West Roundabout (of retail park) as there would be a longer viewing distance for pedestrians (in both directions). Traffic roundabout (West) is rather fast coming round "blind" corner when heading to "Tesco".</p>
I Stewart	<p>Following the public meeting held at Inshes Church on 29-09-14 please take into account my earlier comments to the Issues and Options consultation that are provided below, along with my supplementary comments.</p> <p>Comments on Issues and Options Consultation</p> <p>I wish to add the following to my earlier representation provided below during the Issues and Options Consultation which is provided below.</p> <p>The constraints insets are too small a scale to easily interpret the information provided. However, all relevant constraints appear to be adequately considered. Reference the larger scale 'sieve map' on Page 7: is the blue mark something to do with flood prevention?</p> <p>I'm not sure what an 'Active travel improvement opportunity' is? Do you mean an internal service road for use by the Police or something else? Suggest that Highland Council ask Stagecoach and other local bus companies to provide bus timetables at all bus stops.</p> <p>Suggest that Highland Council ask Stagecoach and other local bus companies to provide bus timetables at all bus stops.</p> <p>The 'Walking Distances' Inset shows a 10 minute travel time on foot from Culcabock junction to Local Dev Plan allocation IN55. I would suggest you were jogging when you established this figure. Again, scale of insets is so small. Dell of Inshes site occupies a pivotal location with excellent links to A9(T); A96(T) and potentially A82(T). This site would lend itself to a more prestigious use such as a civic purpose, even relocation of the Local Authority HQ and</p>

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Customer/ Organisation	Verbatim Comments
	<p>gaining symmetry through proximity with Police HQ; Hospital and Beechwood Business Park.</p> <p>If the Dell of Inshes site is developed for commercial uses such as shops then buildings should be restricted to single storey designs to keep a low visual profile and minimise intrusion as viewed from the A9. The Brief includes no provision for formal/indoor sports recreation, much needed at this location i.e. the centre of Inverness' population.</p> <p>1. Commend the outline proposal for improvement of the Fluke Roundabout junction. 2. Ambulance Junction – subject to closure of the Drumossie Avenue slip road access onto Old Perth Road opposite Raigmore Gardens (ambulance access road) there would be no benefit in having traffic lights at this junction. There would be 3 sets of lights between Culcabock Junction and Hospital access i.e. 3 sets of lights in about 200yds and would cause traffic congestion without any obvious benefit. 3. I support the proposal to close vehicular access between Drumossie Avenue and Old Perth Road. 4. Commend closure of vehicular access to Beechwood House. 5. I'm supportive of the Alternative Proposal to widen the Inshes Overbridge to 2 lanes in each direction. NB Outline Proposals Map doesn't have a scale.</p> <p>Comments on Draft Development Brief</p> <p>1) DELL OF INSHES I believe this site carries a potentially high development value by virtue of its location and therefore will command a high economic rent. This, combined with the substantial on-costs for: Contribution to access upgrade; car parking; flood prevention scheme; contribution to provision of new pedestrian and cycle networks will collectively require whatever form of development goes ahead to generate a higher yield than might be expected from the "small commercial units with active ground floors and "community uses" proposed in the Brief's Guidelines for Development.</p> <p>2) LAND SOUTH OF POLICE SCOTLAND Any buildings on this site should not be higher than the existing Police Scotland Northern HQ.</p> <p>Car parking provision should be located as proposed but should be separated from the adjacent residential properties by an amenity strip with visual screening (e.g. hedge / tree planting – wall) to avoid any noise or light nuisance to residents. Any lighting should be low intensity and unobtrusive.</p> <p>ROAD / TRAFFIC IMPROVEMENTS I support the measures proposed in the Brief to improve traffic and pedestrian movement on Old Perth Road. The proposed replacement of existing access routes from Old Perth Road to Drakies housing estate by one signal controlled junction would help to create a safer traffic layout along Old Perth Road. However this would also create a long, straight directly upon entering Drakies housing and this would be potentially more hazardous for residents. To counter this inevitable outcome the Council should ensure that creation of the new junction incorporate traffic calming measures on Drumossie Avenue.</p>

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Customer/ Organisation	Verbatim Comments
	<p>Any newly formed entrance to Drakies should include measures and design features encouraging drivers to respect the fact they have entered a totally residential neighbourhood and therefore inhibit fast driving. These measures should include as a minimum, a raised table with rumble strips on Drumossie Avenue close to the new junction entrance and, at approximately 200 – 250 m further along Drumossie Avenue, provision of a single carriageway chicane. Chicanes would be more effective than the existing speed humps which are nowadays straddled by wider tracked vehicles such as large four wheel drive / off road vehicles and delivery van. Mention was made at the Public Meeting to a proposal to widen Old Perth Road by means of removing the grass strip separating Old Perth Road and the Drakies access road. Such a proposal would be detrimental to residential amenity and erode the physical character of Drakies housing estate and should not be countenanced under any circumstance.</p>
<p>Goodson Associates (on behalf of Tesco Stores, per Michael Summers)</p>	<p>Representations on Behalf of Tesco Stores Limited</p> <p>We understand that The Highland Council propose to introduce a series of linked traffic signals on the Old Perth Road Culloden Road corridor to improve the flow of traffic and manage queues. A large lozenge shaped roundabout is proposed to the south of Inshes Retail Park which will join with the proposed crossing of the A9 and the Link Road to Smithton.</p> <p>It is our understanding that no detailed junction capacity analysis has been undertaken at this stage and the proposed improvements are of a preliminary nature. Given the proposed alterations to strategic routes in the area and the increase in traffic associated with allocated sites in the Local Development Plan, it is clear that capacity will be a critical consideration, as such, the following comments are related to the concept of the improvements and we reserve the right to comment further following the completion of capacity assessment.</p> <p>The removal of Inshes Roundabout and the direct access to the retail park from this junction will result in a longer journey with increased delays as a result of the traffic signal junctions. Traffic currently reaching the roundabout, with the exception of those travelling west on Culloden Road, will now have to negotiate the traffic lights at the Inshes Junction, the new Retail Park traffic signal junction and then also the new internal junctions which will likely be much busier given the diversion of strategic traffic from the Smithton Link Road.</p> <p>Tesco Stores Limited (TSL) have concerns that the additional distances and delay will impact considerably on pass-by trade and make the store less attractive to existing customers. We would ask that capacity analysis and journey time comparisons be undertaken to indicate the likely increase in delay to customers entering exiting the store to allow TSL to fully understand the implications on trade.</p> <p>Given the extra delay, we would ask that access to the northern part of the store car park be introduced in to the proposed design which will reduce the need for customers entering from Culloden Road to travel further to the southern entrance.</p> <p>The petrol filling station (PFS) enjoys a visible location on the local road network which ensures it attracts considerable pass-by trade given the ease of entry exit. The proposed layout introduces a convoluted access to the PFS which will likely impact on trade and even the attractiveness to customers of the store. We would ask that a left in /left out arrangement on to Culloden Road be introduced to enhance pass-by trade and that the PFS can be accessed from the northern part of the car park to ensure store customers can access the facility. We are happy to work with the council to ensure an appropriate design is developed which enhances circulation within the site but restricts rat running to avoid the main access junction to Culloden Road.</p>

* Indicates supporting document supplied – see appendix A

Customer/ Organisation	Verbatim Comments
	<p>We note that access to the southern part of the car park has been maintained from the proposed roundabout which we support.</p> <p>We are concerned with the size and location of the SUDS pond as it utilises an excessive amount of land which TSL would wish to utilise for parking. We believe the ponds can be separated in to smaller ponds which would reduce land take and ensure an efficient system.</p> <p>With respect to road related improvements, we note that developer contributions will be used as a mechanism for funding the works. We would ask that all funding is in place prior to development proceeding given the congestion levels as any increase in development without mitigation would have a serious impact on road safety and therefore trade.</p>
Transport Scotland (per D Torrance)	<p>I have reviewed the draft Development Brief for Inshes and Raigmore which has taken into account the latest options for the A9/A96 Connections. I welcome the commitment to revise the brief once a Preferred Route for the A9/A96 has been identified. In this context I have no specific comments to make on the content of the brief at this time but can confirm that Transport Scotland will continue to work closely with The Highland Council as both schemes progress.</p> <p>In terms of progress on the A9/A96 scheme, we are currently considering the feedback from the public exhibitions and plan to complete the appraisal that leads to a recommended option by the end of 2014. This recommendation will be discussed with Ministers and the preferred route announced in 2015. There is a considerable amount of work to be done to develop the design of the option and secure the relevant authorisation. The first stage is a Design Manual for Roads and Bridges Stage 2 assessment which refines the preferred option resulting in the selection of a preferred route alignment. Transport Scotland are working to a programme that anticipates this route alignment being announced in 2015. Progress of the scheme beyond this point will be dependent on Ministerial approval and funding being available.</p> <p>Typically the next stage of the design and authorisation process, Stage 3, would take some 18 months. It includes developing the preferred route alignment in detail, undertaking an environmental impact assessment and land required for the construction and maintenance phases is identified. Once the design has been developed sufficiently and the environmental impact assessment undertaken we move to the statutory process phase. This is when draft Orders, Compulsory Purchase Orders and an Environmental Statement are all published for formal consultation. The programme for the scheme beyond this point will depend upon the number of objections and whether a public local inquiry is required. For these reasons, it is not possible to provide a definitive opening date for the scheme.</p> <p>Please feel free to call if you wish to discuss.</p>
Inshes Church (per R Wakeling)	<p>I am interested in the installation of new lighting along the lane between Briargrove Drive and Inshes Tesco car park. There is also a need for a footpath alongside the lane and constructing a footpath may involve constructing a culvert to contain the flow in the adjacent burn. Please let me know what plans are being made for this and whether there is likely to be any progress in the foreseeable future. I noticed that new lighting was installed recently along the lane between the bottom of Briargrove Drive and the top of Briargrove Drive (along the alternative route using the old former rural lane). I wonder why this lighting was not extended to the busier part of the lane between Briargrove Drive and the shopping area. We use it regularly for pedestrian access to</p>

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Customer/ Organisation	Verbatim Comments
	public transport and the shops. It can be dangerous during the dark months of the year.
G Watson	I believe it would be helpful if coming from Culloden that the bridge crossing be extended to two lanes. This would improve the traffic flow.

* Indicates supporting document supplied – see appendix A

Appendix A – Supporting Documents

C Dickinson

German Road



* Indicates supporting document supplied – see appendix A

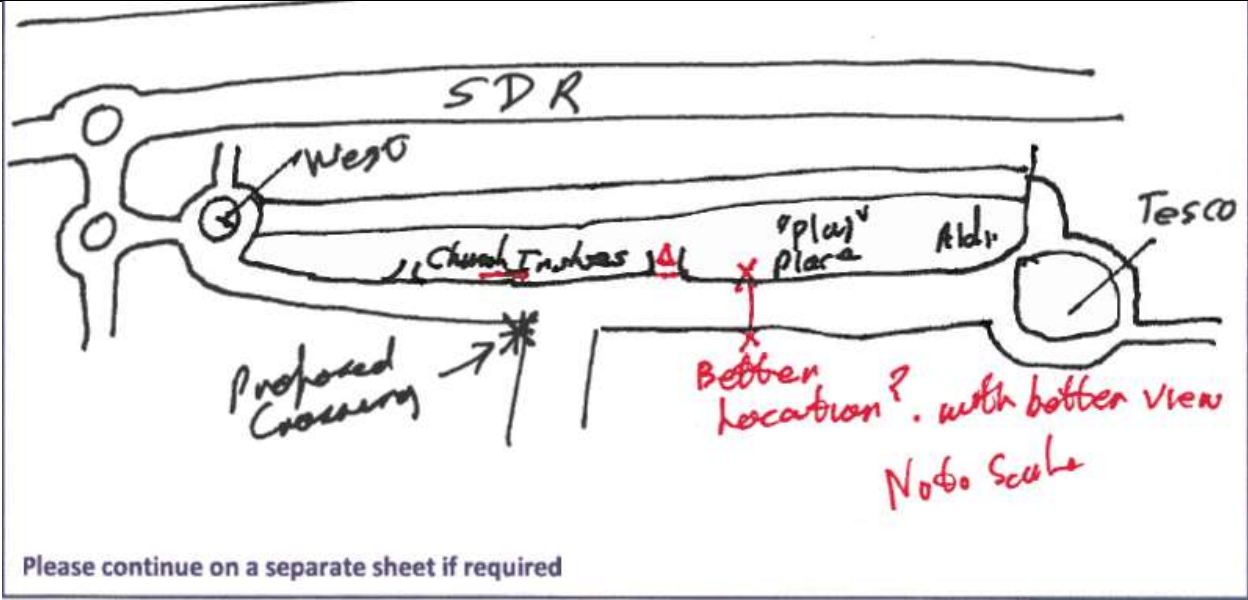


* Indicates supporting document supplied – see appendix A

Graham and
Sibbald (Acting
on behalf of Mr
& Mrs Grant, per
K McGuire)



* Indicates supporting document supplied – see appendix A



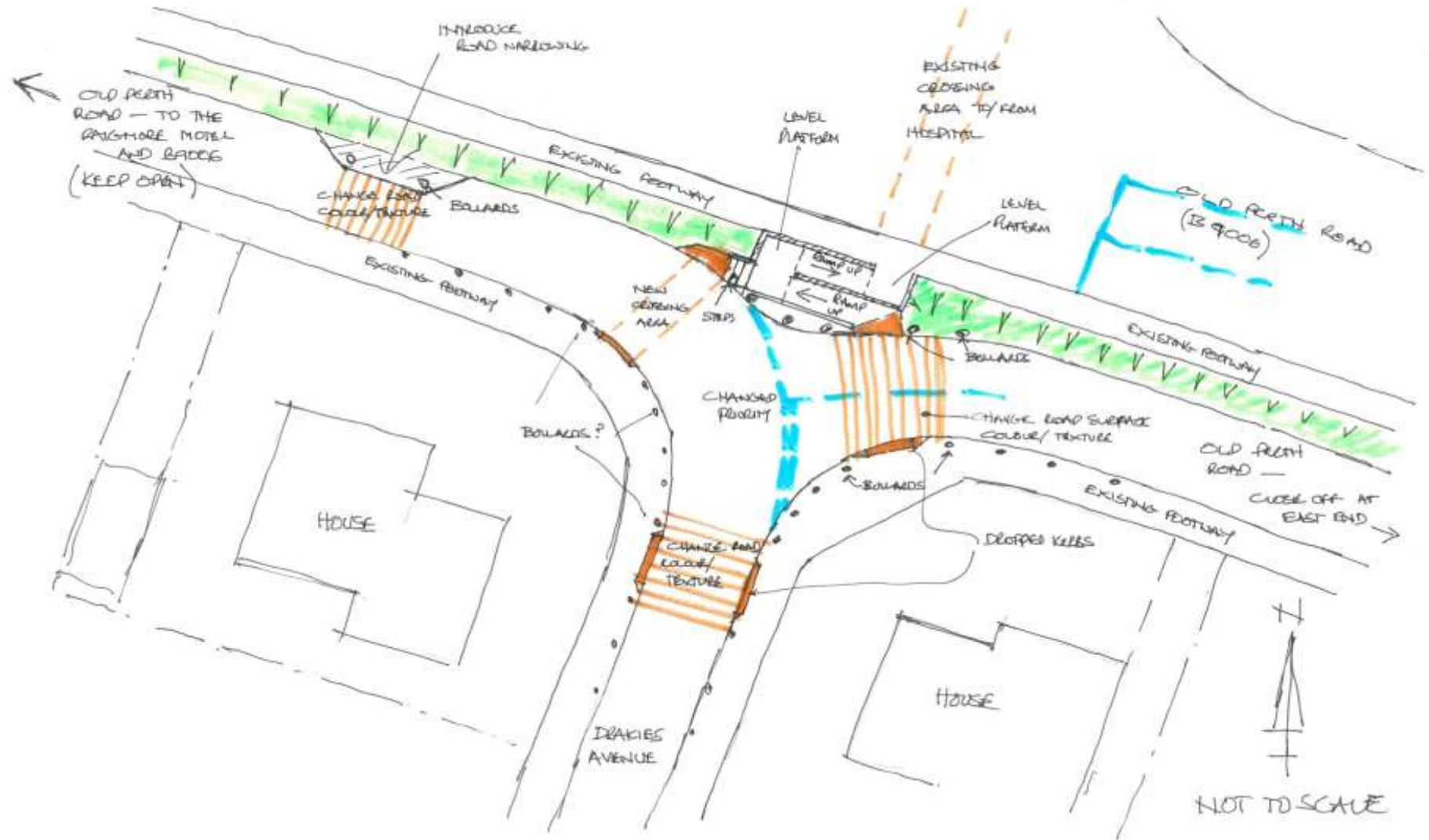
* Indicates supporting document supplied – see appendix A

GH Johnston
Building
Consultants Ltd
(per A Ogilvie)



* Indicates supporting document supplied – see appendix A

SUGGESTED DRAKIES AVENUE - OLD PERTH ROAD JUNCTION & CROSSINGS



* Indicates supporting document supplied – see appendix A