

## APPENDIX B: SUMMARY OF COMMENTS RECEIVED ON DRAFT INSHES AND RAIGMORE DEVELOPMENT BRIEF AND RECOMMENDED RESPONSES

Note verbatim comments, including supporting documents, can be viewed on the Council website ([www.highland.gov.uk/irdb](http://www.highland.gov.uk/irdb)) or in the Members Lounge.

| Customer/<br>Organisation  | Summary of Comments   | Recommended Response & Reasons   |
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| <b>Scottish<br/>Christian<br/>Party,<br/>Inverness<br/>Branch (per D<br/>Boyd)</b> | <p>Refers to earlier submission to Issues and Options Consultation which stated that changing Inshes Roundabout to a four-way junction is unnecessary as the roundabout is only congested at peak times and reducing the number of entry/exits at the roundabout would help to reduce existing congestion.</p> <p>Further discussion modified some earlier proposals, now suggests:</p> <ol style="list-style-type: none"> <li>1. Public concern that A9/A96 Connections Study is a 'road to nowhere' – can be overcome by introducing four way connection with the A9. As the A9 is rising at this point, the solution is an underpass of the A9 with two small roundabouts on the west and east of the A9 in the lower fields. Will reduce the length of the slip roads to and from the A9; improve general amenity for the crossing of the rising A9; will preserve the current A9 overbridge. This necessitates leaving adequate space on the west of the A9 for a small roundabout and slip roads.</li> <li>2. Improvements A9 overbridge are a priority given Beechwood Campus opens in 2015. Work can be joined with proposals for realigning the road to Tesco Inshes and the petrol station.</li> <li>3. Little consensus on replacing Inshes roundabout – phase A9 overbridge and Tesco improvements first, to assess impact on the roundabout.</li> <li>4. Strong resistance to altering the Inshes roundabout on access to the Drakies estate. Considers re-think is necessary on Old Perth Road section of Inshes Junction Improvements to incorporate easy entrance and egress from hospital and Drakies Estate. Notes total width of two sections of Old Perth Road plus grassed area provides a huge resource. Suggests possibility of making area a one-way system to allow traffic to enter and exit each point with a left-hand turn – would improve traffic flow and allow space for stacking vehicles. Likely traffic lights will only be required to enter Drakies and the hospital, particularly if Inshes roundabout is retained and incorporated into the new layout.</li> </ol> | <p>Noted. These comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.</p> |
| <b>E Cloud</b>   | <p>Does not wish lane between southern end of Dell of Inshes and housing estate to be changed into a big road because it would not be safe to walk to Tesco.</p>  | <p>This lane is currently a single track road that provides vehicular access to properties at Inshes Holdings. It is also a well used pedestrian route that connects to the</p>  |

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|                           |   | housing estate at Woodgrove Crescent and further afield. Transport Scotland's A9/A96 Connections Study route options C and D propose to connect to this single track road as do the Outline Proposals for Inshes Junction Improvements. This road would be required to be upgraded to accommodate additional traffic as part of these schemes. A pedestrian/cycle route would be provided as part of any upgrade.  |
| <b>L Cload</b>            | <p>Concerned that development proposals for Dell of Inshes have not considered traffic movements and pedestrian safety because: additional junction on Culloden Road would exacerbate existing congestion issues; does not consider effect of future additional traffic as a result of West Link; would increase traffic on road past Inshes Estate and increase risk of children going from the estate to the shops. Requests significant improvements to pedestrian and cyclist infrastructure to enhance safety.</p> <p>Considers blocking pedestrian route between lane at southern end of Dell of Inshes, housing estate and bus stop to the city would lengthen journey time and discourage walking and cycling.</p> <p>Agrees Inshes Retail Park should be developed prior to green field site at Dell of Inshes. Also considers other brown field sites in Inverness should also be developed first, including former B&amp;Q.</p> <p>Does not consider development should be linked with the new A9 connection – preference for A9 connection further south to connect to Co-operative roundabout because this would allow for better development opportunities where there are few amenities at present. Current development area is too narrow.</p> <p>Wishes following requirements if development takes places at Dell of Inshes: limit opening times; limit uses to minimise noise, litter and disturbance; tree planting between site, A9 and Inshes Estate to compliment existing mature trees. Notes the existing mature trees are an important nesting site for rooks and should not be damaged.</p> <p>Considers more appropriate use for Dell of Inshes is flood attenuation and green space to provide amenity for the area.</p> | <p>A number of these comments relate to detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study. Responses on issues directly relevant to the development brief are provided below.</p> <p>The developer at Dell of Inshes is required to submit a transport assessment to accompany any planning application. The transport assessment will be required to demonstrate that a new access to Dell of Inshes will not result unacceptable levels of traffic congestion. Traffic data used for the transport assessment will also be required to take account of future predicted traffic flows, this includes any additional traffic as a result of new development and planned changes to road infrastructure. Pedestrian and cyclist infrastructure must be provided as part of any changes to the transport network.</p> <p>The pedestrian route at the southern end of Dell of Inshes would not be blocked as part of proposed changes to the transport network. This road would be required to be upgraded to accommodate additional traffic as part of the Transport Scotland A9/A96 Connections Study (should route option c or D be chosen) and Inshes Junction Improvements Phase 2. A pedestrian/cycle route would be provided as part of any upgrade.</p> <p>Support for the phasing requirement in the development brief for Inshes Retail Park South to be completed prior to Dell of Inshes are noted. The brief continues to specify this requirement, however, following comments from the developer of these sites a degree of flexibility has been provided if the applicant submits a reasoned justification for early development at Dell of Inshes and landscape and amenity enhancements are completed at Inshes Retail Park South. Comments regarding development of other brownfield sites in Inverness are noted. However there is no policy provision in the development plan for such a requirement and this would be outwith the scope of the brief.</p> |

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|                           |  | <p>In terms of requirements requested for Dell of Inshes the brief has a requirement for the protection of the amenity of nearby houses. In terms of limiting uses to minimise noise most uses supported by the brief are unlikely to result in excessive noise with the exception of a public house. However the brief does have a requirement for a noise assessment dependant upon the nature of uses proposed and for consideration of amenity of nearby houses. It is beyond the scope of the brief to limit opening times. The brief has a requirement for visually attractive landscaping at the locations suggested. Comments regarding the existing trees are noted; the brief has a requirement for species surveys and a presumption in favour of retaining existing trees and/or compensatory planting.</p> <p>With regards a more appropriate use being for flood attenuation and green space this is not possible given the principle of development on the site has been established by the development brief. The brief does however have a requirement for any land required for Inshes Junction Improvements, including the related Dell Burn Flood Attenuation Scheme, to be safeguarded from development.</p> |
| <b>B Cruikshank</b>       | Houses that front onto Old Perth Road fues extend out to the rear of the footpath on the main carriageway; therefore individual householders own the road and grass verge.   | This comment relates to detailed transportation matters and will be considered further by the Council in progressing Inshes Junction Improvements Phase 2.  |
| <b>C Dickinson*</b>       | <p>Wishes increased width of joint pedestrian and bicycle crossings including separate lanes for different modes of transport because remainder of Europe does this and it would improve safety.</p> <p>Considers plan promotes increased car use and therefore will not reduce traffic numbers by not supporting the needs of greener forms of transport.</p> <p>As a frequent cyclist in the area considers that new campus access does not cater well for active travel, more suited for vehicles because cyclists are forced to give way to traffic at every minor road junction which encourages cyclists to ignore cycle tracks.</p> <p>Considers improved design could help limit deterioration of roads due to traffic volumes and adverse weather. Suggests improve surface water drainage to allow water to escape quickly, provides photographic evidence of successful German example that includes two courses of bricks that sit on a bed of grit with an underlying drain. Also have benefits of increased visibility and reducing traffic speeds without use of speed bumps.</p> | <p>A number of these comments relate to detailed transportation matters and will be considered further by the Council in progressing Inshes Junction Improvements Phase 2.</p> <p>The Transport Scotland publication Cycling by Design advises that shared use paths should be considered after careful thought about controlling traffic, volume, speed, junctions and crossings and carriageway space first. Often, due to existing constraints for example the presence of built development, it is not possible for segregated routes to be developed. The Council determines the appropriateness of shared or segregated routes taking into account all constraining factors.</p> <p>Illustrations of good practice from Europe are noted and will be considered further as proposals for Inshes Junction Improvements Phase 2 are progressed.</p>   |

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| <b>SportScotland<br/>(per E<br/>Fotheringham)</b>                                 | Notes that comments were made to the earlier Issues and Options consultation and requests that these previous comments are considered again if appropriate.   | Noted, the brief does not have any direct impact on outdoor sports facilities.  |
| <b>C Fraser</b>   | <p>Requests:</p> <ul style="list-style-type: none"> <li>• Segregation between cyclists and pedestrians, for example use of barriers because shared use paths are dangerous and users needs to be considerate;</li> <li>• Provision of land for people to grow their own food, for example allotments. Important for these to be secured to prevent vandalism and theft;</li> <li>• Provision of peak time traffic lights on Culcabock roundabout in the short term; and</li> <li>• Provision of pedestrian, cyclist and equine bridges across all new roads.</li> </ul>   | <p>The Transport Scotland publication Cycling by Design advises that shared use paths should be considered after careful thought about controlling traffic, volume, speed, junctions and crossings and carriageway space first. Often, due to existing constraints for example the presence of built development, it is not possible for segregated routes to be developed. The Council determines the appropriateness of shared or segregated routes taking into account all constraining factors.</p> <p>The brief specifies that allotments must be provided as part of the mix of uses at Dell of Inshes. Security provision will be considered at the detailed planning stage.</p> <p>Other comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.</p>   |
| <b>Slioch<br/>Property (on<br/>behalf of R<br/>Matheson, per<br/>M Gillespie)</b> | <p>Refers to site IN52 in the Inner Moray Firth Proposed Local Development Plan which is proposed to be allocated for housing, retail and business uses. Notes that the site lies outwith the development brief but the access road is a fundamental part of the brief.</p> <p>Notes brief proposes various changes to the Fluke roundabout and Ambulance junction immediately north of IN52. Concerned that proposals for Inshes Junction Improvements have no regard to this requirement and may restrict future access options to IN52, contrary to development plan requirement for access improvements to enable its development. Issue been raised with Council Transportation Officers and is hoped a solution will be provided that assists delivery of an allocated site.</p> <p>Requests brief is amended to include alternative road solutions / options that will assist the access and development of IN52 rather than restrict future options as per the current proposals.</p> | <p>Site IN52 of the Inner Moray Firth Proposed Local Development Plan lies outwith the development brief boundary, however it is contained within the study area of Inshes Junction Improvements. The delivery of this site is challenging due to a number of constraints including access. It is important that Inshes Junction Improvements does not result in further challenges to creating an access solution to the site. To this end the Council have agreed to consider access to this site as part of developing proposals for Inshes Junction Improvements. However this work is ongoing and the Council are not currently in a position to include alternative road solutions / options that will assist with access to the site within the brief. To help reflect this additional text has been added to the movement strategy section of the brief to explain that the Council will work with interested parties, particularly landowners directly affected by the proposals, as the designs evolve.</p> |
| <b>M Gordon</b>   | <p>Requests:</p> <ul style="list-style-type: none"> <li>• Withdrawal of policies as Dell of Inshes should be retained as green wedge</li> </ul>   | <p>Policy 7: Inshes and Raigmore of the Highland-wide Local Development Plan 2012 revokes part of the green wedge allocation at Dell of Inshes in the Inverness Local</p>   |

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|   | <p>as per the outcome of the Inverness Local Plan Public Local Enquiry 2004;</p> <ul style="list-style-type: none"> <li>• Retain all amenity on site, without this there will be an impact to residential properties and their title deeds in the area;</li> <li>• Further work on flood risk and drainage undertaken first; due to water table after prolonged periods of rain, for example 8 October 2014 and 2002; Dell of Inshes Burn will burst it's banks in time; and</li> <li>• A1 colour hard copies of plans and reports as they are made available.</li> </ul>   | <p>Plan and establishes the principle of development at Dell of Inshes. It is therefore not possible in for the allocation at Dell of Inshes to be reverted to its former green wedge allocation. The brief requires built form of Dell of Inshes to protect amenity of nearby houses. No explanation has been provided by the customer to explain the way in which title deeds in the area may be affected.</p> <p>The Council is aware of flood and drainage issues in the area. Several studies have been commissioned by the Council in the past and land for a flood attenuation pond has been identified as part of Inshes Junction Improvements. The applicant at Dell of Inshes is also required to undertake a flood risk assessment and drainage impact assessment to support any planning application. It is therefore considered that these studies and any identified mitigation <b>with</b> the satisfaction of SEPA and the Council will provide sufficient certainty in terms of flood risk issues for the principle of development to be delivered on the site.</p> <p>Requests for copies of plans are noted and were provided following the public meeting on 29 September. Customer is contained on the Development Plans Customer database and will therefore be kept informed of progress.</p> |
| <p><b>Scottish Environment Protection Agency (per S Haslam)</b></p> | <p>Supportive of the positive approach taken on flood risk, SUDS, culverting and connection to the public foul sewer.</p> <p>Note that development brief is closely connected to Inshes Junction Improvements project which includes significant element of flood alleviation for the Dell Burn. Look forward to reviewing details of this separate project, understand by necessity, assessment work will be carried out separately and full details are not available at present to inform this document. Note brief makes clear for all development the outcome of that project will have to be considered and allowed for, satisfied with that approach. Hoped that some of the detailed study required for the Dell Burn may help inform the appropriate development of the surrounding areas.</p> <p>Requests para 1.20 the 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" because this will explain to the reader why these watercourses have not been included in the maps.</p> | <p>Noted, the Council will consult SEPA as plans progress for Inshes Junction Improvements and its related flood attenuation scheme.</p> <p>Agree additional suggested text for section 1.20 would help explain to the reader why these watercourses have not been included. The brief has been amended to include this additional text.</p>   |

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| <b>Scottish Natural Heritage (per G Hogg)</b> | <p>Pleased most previous comments are reflected in the draft brief, particularly welcome recognition of green network in the area and links to the wider green network, and provisions for its maintenance and enhancement. Note brief may need early review once key transport design projects in the area are finalised, this would have implications for the green network in the area.</p> <p>Para 1.18 – add reference to watercourses and paths, i.e. “The area contains some attractive and valuable green networks, consisting of watercourses, open space, trees, planting and paths”.</p> <p>Figure 7– strongly welcome the identification on this map of ‘Active travel/green network enhancement opportunities’ and ‘watercourses’. Consider these two aspects are inter-related, since watercourses are a ‘blue’ feature of the green network. 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"> <li>• Southwards from Dell of Inshes (watercourse + path);</li> <li>• South-eastwards from Dell of Inshes (watercourse + trees, linking to a tree belt); and</li> <li>• North-eastwards from Raigmore Park (to include the ‘Golden Bridge’ active travel link to Beechwood).</li> </ul> <p>Para 2.14 – welcome this section on green networks. Suggest it could begin by explaining why it is important to safeguard and enhance green spaces and the green network. Suggest addition of following text at beginning of paragraph – “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 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>Noted. Suggestions for additional explanation, references and requirements regarding green networks are agreed with and have been incorporated in the brief.</p> |

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|  | <p>Figure 14 – recommend watercourses are shown on this figure, given their important role as part of the green network. Then recommend 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 – welcome the safeguarding of existing green network features as a requirement. To complement this (taking into account Scottish Planning Policy 2014 paras 221 and 232) suggest an additional key requirement:</p> <ul style="list-style-type: none"> <li>• Incorporation of green infrastructure as an integral element of detailed design</li> </ul>   |   |
| <p><b>Culcabock &amp; Drakies Community Council (per J Home)</b></p> | <p><b>Dell of Inshes</b></p> <p>Requests wider range of uses are supported in the brief because: current uses solely reflect uses proposed in current Dell of Inshes application; site occupies pivotal location close to trunk roads; proximity to large private and public sector employment activities suggest location attractive to major organisations and to attract a broader spectrum of developers from all business sectors.</p> <p>Suggests following alternative uses: education; public / private sector health; research; civic administration; hotel; residential retirement or care home.</p> <p>Opposes further retail development for the following reasons: detrimental to local communities; existing retail park already contains a large amount of retail floor space; residents of Drakies and Milton of Leys do not need more retail outlets; city centre already negatively impacted by out of town retail development; if sequential test was applied as per Scottish Planning Policy then developers of supermarkets or smaller scale retail development might reasonably be directed to Inshes Retail Park South.</p> <p>Requests development brief clearly demonstrates 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><b>Dell of Inshes</b></p> <p>The site at Dell of Inshes is intended to form an expansion of Inshes District Centre and provide a range of uses that serve a district catchment and are complementary to existing uses within the district centre. As such it is agreed that a number of the uses suggested should be added as use options within the brief – uses that been added are: small scale convenience/food retail, health care, hotel and nursing home/residential accommodation with care. It was not felt that education or research uses would be appropriate within the district centre as the development plan directs this type of development to other locations, in particular the new Beechwood Campus that is currently under construction. In terms of civic administration this was interpreted to mean Class 4 Business Use of The Town and Country Planning (Use Classes) (Scotland) Order 1997. Given the site is intended to form part of an expanded district centre at Dell of Inshes that provides a range uses for members of the public to visit, business use is not considered appropriate in this context.</p> <p>Reasons for opposing further retail development are noted, however the brief continues to accept that non food retail would be an acceptable use on the site (with the exception of small scale convenience/food provision). In terms of demand the development plan covers at least a 10 year period; the brief requires Inshes Retail Park South to be completed first (however this is subject to certain exceptions) and ultimately if there is limited then if the developer is successful in obtaining planning</p> |

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|  | <p><b>Land South of Police Scotland</b></p> <p>Supports access options shown in brief; would oppose any incursion, including for access purposes, into Drakies playing fields or play park.</p> <p>Concerned that development could have a detrimental effect on the amenity of nearby residents, particularly those living on Drumossie Avenue. Requests 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. Requests that if car park for development is located adjacent to Drakies housing then it should be screened by fencing and planting with lighting of a type designed to cause no intrusion or detriment to residential amenity.</p> <p><b>Traffic Matters</b></p> <p>Emphatic opposition to any measure that would cause loss of, or reduction of this green strip between the two sections of Old Perth Road because: green areas are integral part of the well designed neighbourhood and provide high standard of residential amenity, in particular provides separation between housing and traffic and reduces impact of noise and fumes; existing areas of good quality design should be safeguarded as well as promoting good design in future development; traffic congestion on Old Perth Road is due to wider traffic network issues; incremental widening of Old Perth Road would move congestion elsewhere, therefore providing a minimal temporary improvement at significant cost and irretrievable detriment to the suburban character of Drakies.</p> <p>Disagrees with the proposal to form a single light controlled access to Drakies estate as this would encourage non-local traffic to enter Drakies and cause it to be used as a rat-run or cut-through.</p> | <p>permission they may not built out the site. The development brief requires the terms of Scottish Planning Policy to be met whereby any proposals for any uses which generate significant footfall must justify why locations within Inverness City Centre or the edge of centre are not suitable. The brief also restricts uses to non food retail (with the exception of small scale convenience/food provision) therefore a supermarket development would be unlikely to be supported on the site.</p> <p>The development plan identifies Inshes Retail and West Seafield Retail Park as district centres with capacity for expansion, therefore the principle of expansion of these retail parks has been established by the development plan and does not required to be justified in the development brief.</p> <p><b>Land South of Police Scotland</b></p> <p>The access options shown for Land South of Police Scotland would not impact Drakies playing fields or park. This area is allocated as protected open space within the development plan and there is therefore a presumption against development in such areas. Given that uses supported at the site are limited to business use it is unlikely that significant amenity issues will arise as a result of development consistent with the brief. However concerns regarding the potential impact of a car park adjacent to housing are noted; the brief requires landscaping to be provided between the site and Drakies and an additional requirement has been added for amenity of adjacent residential properties to be minimised.</p> <p><b>Traffic Matters</b></p> <p>Traffic matters raised are detailed transportation issues that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2.</p> |
| <p><b>Westhill Community Council (per C Johnson)</b></p> | <p>Makes reference to comments submitted to earlier consultation.</p> <p>Stresses importance of Council and Transport Scotland working together to provide additional lanes on Inshes Overbridge to alleviate traffic queuing on the A9, particularly due to Beechwood Campus opening in 2015.</p> <p>Supports proposed new access to Tesco and encourages further restrictions on</p>  | <p>Noted. Many of these comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.</p> <p>The Council is currently working with Transport Scotland on progressing studies to establish if technical specifications to provide additional lanes on the Inshes Overbridge can be provided.</p>  |



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|                           | <p>accesses to the Inshes roundabout but recognise further studies are required as this may cause problems for Drakies residents. However, do not consider Inshes roundabout itself is a major problem and should not be replaced by traffic lights – considers additional traffic lights on the B9006 will increase congestion rather than solving it.</p>   | <p>The developer at Dell of Inshes is required to submit a transport assessment to accompany any planning application. The transport assessment will be required to demonstrate that a new access to Dell of Inshes will not result unacceptable levels of traffic congestion in the area, including the B9006.</p>   |
| <p><b>A Johnson</b></p>   | <p><b>Dell of Inshes</b></p> <p>Notes representatives from the Council’s Transportation Team and Transport Scotland were not present at the brief’s consultation event on 29 September 2014.</p> <p>Notes the fundamental principles for the Inshes and Raigmore Development Brief are to:</p> <ul style="list-style-type: none"> <li>• provide a development framework to co-ordinate and best utilise improvements to strategic road capacity; and</li> <li>• to achieve no net detriment to the existing surface water drainage and attendant flood risk.</li> </ul> <p>Disappointed that suitable representation on these topics have not provided to support the public consultation. Considers this seriously undermines the public consultation as public as interested parties had no direct opportunity to discuss and challenge the proposals with the creators of these significant and critical elements of the brief.</p> <p><b>Invalidate Supplementary Guidance</b></p> <p>Notes brief accepts that it is being prepared in advance of finalisation of Inshes Junction Improvements and related flood scheme and Transport Scotland A9/A96 Connections Study and that brief considers that it will provide a sufficient level of detail for the Council to determine planning applications in the area. Contests this statement because: statutory supplementary guidance must provide detail to provide assessment criteria to determine planning applications in the area.</p> <p>Provides explanation of expected content of supplementary guidance from Planning Circular 1/2009 including required links between a local development plan and supplementary guidance.</p> | <p>A consultation event focussed on the draft development brief was held on 29 September. Representatives from the Council’s Transportation Team or Transport Scotland were not in attendance because the event was focussed on the development brief, there was no live consultation on the related transportation projects and planning officers in attendance were well versed on the transportation projects.</p> <p><b>Role of Supplementary Guidance</b></p> <p>The Highland-wide Local Development plan, through its spatial strategy for Inverness and by Policy 7: Inshes and Raigmore, establishes the principle of an eastern link between the A9 and A96, prioritisation of transport improvements in the Inshes/Raigmore area and flood alleviation. It is entirely appropriate for the detail of these developments to be provided in supplementary guidance.</p> <p>Scottish Government Development Planning Circular 6/2013 explains that matters that should be included local development plans and not in supplementary guidance includes green belt boundaries. The Inverness Local Plan identifies a wider area including Dell of Inshes as a ‘green wedge’ which has similar designation principles to a green belt. The loss of part of this green wedge was consulted upon during the preparation of the Highland-wide Local Development Plan and the outcome of the Examination of that plan was to establish the principle of development at Dell of Inshes. It is accepted that this only meant to loss of the part of the green wedge contained within the original brief boundary as shown in the Highland-wide Local Development Plan. The loss of the remaining part of the green wedge was consulted upon during preparation of the Inner Moray Firth Local Development Plan which identifies the area as ‘white land’. As such changes to green wedge boundaries have not been debated as part of supplementary guidance.</p> <p><b>Development Brief Boundary</b></p> |

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|                           | <p>Considers that because the brief is being prepared in advance of finalisation of related infrastructure projects it is based on undefined, unsubstantiated and invalidated information. States that 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>Considers data used in transport model for Inshes Junction Improvements and Transport Scotland A9/A96 Connections Study is unrepresentative because:</p> <ul style="list-style-type: none"> <li>• Data is over 5 years old and do not reflect or recognise completed and ongoing developments;</li> <li>• Inner Moray Firth Local Development Plan Modelling Report model explains that study is: <ul style="list-style-type: none"> <li>○ At strategic level and has limitations in assessment at local level;</li> <li>○ further data is required to assess local issues; and</li> <li>○ no improvement to the local traffic flow within Inverness City can be achieved.</li> </ul> </li> </ul> <p><b>Local Development Plan Scope</b></p> <p>If 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 brief fails to present necessary evidence that due consideration has been accommodated on all material matters identified, particularly because the brief 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>Considers that development brief is contrary to the Development Planning Circular guidance for what should be contained in supplementary guidance because it is centred around development proposals of more than local impact. It incorporates the provision of enhancements for local and strategic road network improvements and promotes the expansion of the development boundary as defined in the adopted Local Development Plan into residential and green wedge areas. Provision of local and strategic road network enhancements are more than local impact and therefore should be included in the local development plan. Notes that green belt boundaries</p> | <p>The draft brief explains that the brief boundary was expanded in comparison to the boundary shown in the Highland-wide Local Development Plan to include additional areas that have potential for change. The expansion of the boundary was discussed with local Members and the revised brief boundary was presented to the City of Inverness Area Committee in December 2013. It is accepted however that further explanation should be provided in the brief to explain the additional areas included within the brief boundary and why they were included. As such the following text below has now been included within the brief: 'These areas include properties and land to the south of Dell of Inshes, Raigmore Park and properties and land at Inshes Holdings. The area to the south of Dell of Inshes was included as two options presented by the Transport Scotland A9/A96 Connections Study identified part of the proposed new road alignment within this area. Properties and land at Inshes Holdings were included as access changes to these properties are likely as a result of the related Inshes Junction Improvements project and also to allow the brief to help manage any potential amenity impacts as a result of future development at the adjacent Dell of Inshes site. To the north Raigmore Park was included as it lies within the wider catchment area of the Dell Burn and forms an important part of the wider active travel network.'</p> <p>It is considered that sufficient consultation has been undertaken with nearby landowners whereby they were invited to a private exhibition during issues and options consultation to discuss the brief and related transport projects and were also directly notified of the publication of the draft development brief and informed of how to make comments. The Council will continue to work with interested parties as proposals progress, additional text has been added to the movement strategy in the brief to reflect this. The movement strategy explains that the Council will work with interested parties, particularly landowners directly affected by the proposals, as the designs evolve.</p> <p><b>Local and Strategic Transport Issues</b></p> <p>Comments relating the Transport Scotland A9/A96 Connections Study and Inshes Junction Improvements are detailed transportation matters that will be considered by the Council and Transport Scotland progressing local and strategic transport network improvements.</p> <p>Comments relating to increased traffic as a result of development at Dell of Inshes</p> |

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|                           | <p>should also be included in development plan and not supplementary guidance.</p> <p><b>A9/A96 Connections Study Undefined Objective</b></p> <p>Concerns regarding the Transport Scotland A9/A96 Connections Study for the following reasons:</p> <ul style="list-style-type: none"> <li>• difficult to confirm study undertaken in line with STAG process given limited information available;</li> <li>• lack of any definitive statement of requirements which undermines the value and purpose of the options presented to the public for consideration;</li> <li>• no information is provided of the study objectives nor of the option generation process;</li> <li>• 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;</li> <li>• aim to improve connectivity is vague and unclear in purpose;</li> <li>• a comprehensive traffic survey should be undertaken to determine the trunk and local road user requirements; and</li> <li>• assessment is potentially invalid as there is not any measure to confirm adequacy, compliance and acceptability.</li> </ul> <p>Notes 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><b>Reason for Rejection, Point 1:</b> brief contrary to planning guidance because it does not present the necessary level of detail to justify a local plan with respect to local and strategic road improvements; and development proposals should be presented in the development plan, not supplementary guidance.</p> <p><b>Invalid extension to the Development Brief</b></p> <p>Notes brief explains and illustrates that the development brief boundary has been amended since the publication of the Highland-wide Local Development Plan to include additional areas that have potential for change. Additional areas included with the brief boundary include residential properties directly north of Dell of Inshes.</p> | <p>are noted. The developer requirements for Dell of Inshes have been strengthened in the brief to explain that the developer must undertake a transport assessment which includes traffic modelling to demonstrate that a new access from Culloden Road is technically feasible from the point of view of the movement of traffic and would not result in unacceptable levels of congestion.</p> <p>The Council have also committed to commissioning detailed transport modelling to inform the detailed design of Inshes Junction Improvements. This modelling will be informed using recent traffic count data and realistic development projections.</p> <p><b>Flood Risk</b></p> <p>The brief has been prepared in consultation with the Council's Flood Team and SEPA. Both are satisfied with the content of the brief. A summary of the response to the brief from SEPA is included within this report. It explains that SEPA understand that the development brief is closely connected to the Inshes Junction Improvement project which includes significant element of flood alleviation for the Dell Burn; that by necessity assessment work will be carried out separately and that SEPA will comment further on the related projects in due course.</p> <p>Detailed flood studies are ongoing and technical details will be available in due course.</p> <p>The brief specifies that a flood risk assessment and drainage impact assessment the are required to support any future planning applications at Dell of Inshes. These will need to be satisfactory to the Council's Flood Team and SEPA.</p> <p><b>Relationship with Inner Moray Firth Local Development Plan</b></p> <p>The brief explains that at the time of writing the Council is at an advanced stage in preparing the Inner Moray Firth Local Development Plan and that this plan will refresh the Highland-wide Local Development Plan and provide more detail on the use of land. It also explains that the brief is supplementary guidance to the Highland-wide Local Development Plan.</p> <p>Additional detail has been added in the brief to explain that during the consultation period on the Inner Moray Firth Proposed Local Development Plan a number of representations were received that challenged the proposed site allocations relevant</p> |

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|                           | <p>Does not agree with boundary expansion because:</p> <ul style="list-style-type: none"> <li>• out with the area boundary identified in the adopted Highland-wide Local Development Plan - therefore the Council has no Authority to claim the additional areas have the potential for change;</li> <li>• respondent's property should be identified as a constraint; and</li> <li>• since inclusion of respondent's property in boundary respondent has been denied financial assistance from lending organisations due to the future uncertainty the brief expansion has inflicted on respondents property.</li> </ul> <p><b>Reason for Rejection, Point 2:</b> expansion of brief out with the adopted Highland-wide Local Development Plan defined boundary area.</p> <p><b>Reason for Rejection, Point 3:</b> 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><b>Inadequate Flood Risk Assessment and net detriment increase</b></p> <p>Comment replicates text from Policy 7 Inshes and Raigmore of the Highland-wide Local Development Plan, flood risk related text from Scottish Planning Policy and Highland-wide Local Development Plan flooding and drainage policies. Considers that the guiding principles listed in Policy 7 each require a design development methodology and technical governance regime to define and bound the functional requirements in support of the brief such there is assessment criteria to consider future development proposals. Concerned that this is not is presented other than the solutions presented in the brief with no supporting justification.</p> <p>For example: no evidence of flood risk assessment, mitigation proposals; no reference to Council supplementary guidance on Flood Risk and Drainage Impact Assessment or consistency with it; no 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 to support supplementary guidance or Drainage Impact Assessment . Brief is limited to presentation of a flood attenuation pond and no illustration of flood risk areas.</p> | <p>to the development brief. It also explains that as a result the Council has suggested a limited number of changes to these site allocations in the Plan should the Reporters wish to recommend it. The Report of Examination is expected to be received by the Council in early 2015. Should this recommend significant changes to the site allocations contained in this development brief, the brief will be reviewed at an early opportunity. A link is also provided as a foot note for the reader to access all information, including latest progress, on the Examination of the Inner Moray Firth Local Development Plan. This text is considered sufficient to address the relationship between the Highland-wide Local Development Plan and the emerging Inner Moray Firth Local Development Plan.</p> <p><b>Constraints</b></p> <p>The built and natural heritage constraints drawing illustrates the presence of trees within the area where the flood attenuation pond is proposed. Potential tree impacts will be investigated in further detail detailed designs are developed for Inshes Junction Improvements (including flood defences and attenuation) and a route option has been selected by Transport Scotland. The design guidelines in the brief make clear that there is likely to be impacts on trees as a result of development, and that loss of trees should be minimised and compensatory planting may be required.</p> <p>In terms of tree preservation orders the Council's Forestry Officer's have confirmed that one tree preservation order currently exists within the development brief area – this is between the northern and southern parts of the retail park and is shown as such on the built and natural heritage constraints drawings. Development which may affect other trees with the development brief area must be consistent with the Highland-wide Local Development Plan policies that presume in favour of the retention of trees and if this is unobtainable then compensatory planting.</p> <p><b>Demand</b></p> <p>In terms of demand for additional retail development the development plan covers at least a 10 year period; the brief requires Inshes Retail Park South to be completed first (however this is subject o certain exceptions) and ultimately if there is limited demand then if the developer is successful in obtaining planning permission they may not build out the site. The development brief requires the terms of Scottish Planning Policy to be met whereby any proposals for any uses which generate significant</p> |

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|                           | <p>Notes that para 1.21 states that Dell Burn have studies have been commissioned but no further explanation is provided in the brief. Also considers there is a lack of technical detail on the operation and effectiveness of the proposed flood attenuation pond, however accepts that it will provide SUDS. Inappropriate to incorporate final design mitigation solutions in the 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.</p> <p>Also considers position of the proposed pond would involve the complete removal of the existing mature tree lined avenue which separates the retails park from the adjacent residential area.</p> <p>Concerned there is no evidence of engagement with SEPA who should be involved from the early stages in line with SEPA guidance. Evident that the appropriate design development steps to assess the risk, 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>Considers 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 respondents property will be affected by the proposed road construction earthwork embankments infilling the adjacent land.</p> <p>Concerned that new road embankment will have an adverse effect on natural surface water and ground water seepage and therefore effectiveness of private septic tank soak aways. Great concern due to recent flooding incidents, in particular 8 October when the Dell Burn again overflowed its banks at the entrance to the twin pipe culvert under the B9006 and resulted in extensive flooding.</p> <p>Strongly recommends reconsideration of any plan to develop the Dell of Inshes site as will increase the already high risk of flooding.</p> <p>Notes 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</p> | <p>footfall must justify why locations within Inverness City Centre or the edge of centre are not suitable. Inshes Retail Park south may be able to accommodate demand in the shorter term, however it is important that the development plan allocated land to also satisfy longer term demand.</p> <p>Furthermore the range of uses that are acceptable on the site has been expanded to include a range of non-retail uses.</p> |

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|                           | <p>process, provided flood risk is not increase elsewhere as a result. Also notes that the Council supports SEPA's presumption against culverting for land gain.</p> <p><b>Reason for Rejection, Point 4:</b> 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><b>Reason for Rejection, Point 5:</b> 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><b>Reason for Rejection, Point 6:</b> 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><b>Reason for Rejection, Point 7:</b> 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><b>Inadequate Supplementary Guidance</b></p> <p>Acknowledges that brief references emerging Inner Moray Firth Local Development Plan; site requirements relevant to this plan and that the Council has suggested to Reporters examining the plan a limited number of changes. Concerned that no explanation of these changes have been provided or that the requirements for the relevant sites in this plan have been addressed. In particular considers that requirement for master plan has not been met due to the lack of supporting assessments either development need, road demand, flood risk or environmental issues.</p> <p>Asserts that given Scottish Ministers may recommend significant changes to the site allocations within the brief area then brief should not be adopted in advance of adoption of the Inner Moray Firth Local Development Plan as this would be too late</p> |                                |

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|                           | <p>for any changes to be incorporated.</p> <p><b>Reason for Rejection, Point 8:</b> 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><b>Reason for Rejection, Point 9:</b> 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><b>Recommendation, Point 10:</b> recommends 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><b>Natural Constraints Ignored</b></p> <p>Concerned SUDS features and new planting will result in removal of attractive and valuable mature trees and planting that forms part of a key gateway view over the city and beyond.</p> <p>Lack of detail in identification of trees with preservation orders given several exist and no safeguard provision is claimed. Notes Design Guidelines conflict with the location of some tree preservation orders.</p> <p>Conflict between showing existing constraints on constraints drawings but overlaying this with proposed transport improvements as constraints east of Tesco car park are ignored.</p> <p>Questions if constraints shown are token gestures and not considered in the design of development proposals. For example in reality larger areas are prone to flooding; residential properties in this area are all shown to be in areas of potential development; all mature trees are represented in this area and key gateway views over the city are not safeguarded.</p> <p><b>Reason for Rejection, Point 11:</b> brief does not provide evidence of any defined or detailed provision to protect areas of trees with preservation orders from</p> |                                |

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|                           | <p>development.</p> <p><b>Additional Burden to Local Road Infrastructure</b></p> <p>Considers expansion of Retail Park would generate an additional burden on the existing road network. Council been influenced by developer to include site in the development plan despite:</p> <ul style="list-style-type: none"> <li>• concerns from residents due to site being surrounded by residential properties, field and local access roads; and</li> <li>• development brief not identifying required safeguards set out in the development plan, in particular absence of recent traffic survey data and lack of SEPA engagement.</li> </ul> <p>Notes Inner Moray Firth Local Development Plan Transport Assessment identified future concerns with the Raigmore / Culloden road network. Provides 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 that proposed by Inshes Junction Improvements.</p> <p>Concerned additional sets of traffic lights proposed by Inshes Junction Improvements will result in additional congestion due to short queue lengths and cycle times; possible synchronisation issues and pedestrian phases.</p> <p>Notes pedestrian crossing on B9006 and signals at the campus entrance often results in pulsing of traffic. 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. Considers this would compound and increase the current flood risk to respondents property which is unacceptable because:</p> <ul style="list-style-type: none"> <li>• it is contrary to the first principle of flood prevention and that is avoidance;</li> <li>• contrary to the aims of Inner Moray Firth Local Development Plan; and</li> <li>• proposed flood attenuation pond covers an area which currently tree lined and forms an attractive border to the Inshes retail park and the residential</li> </ul> |                                |



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|                           | <p>and agriculture area immediately to the East.</p> <p>Also considers location proposed embankment:</p> <ul style="list-style-type: none"> <li>• contrary to the proposal to safeguard key views;</li> <li>• would result in isolating the Tesco filling station and provide a new junction to the proposed new access road;</li> <li>• elevated junction leading to respondents property does recognise existing tree lined border to property; and</li> <li>• would result in loss of privacy and amenity to private property at Dell of Inshes.</li> </ul> <p>Proposed Transport Scotland A9/A96 connection that connects with the retail park would destroy any remaining existing avenue of trees which is contrary to the proposal to safeguard key views.</p> <p><b>Reason for Rejection, Point 12:</b> 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><b>No local demand for an expanded District Centre</b></p> <p>Does not consider there is any local demand for an expanded district centre because:</p> <ul style="list-style-type: none"> <li>• no evidence of demand provided;</li> <li>• briefs preferences are inconsistent with current planning policy for Inshes Retail Park;</li> <li>• Inshes residential area well served with local convenience stores as well as the existing retail park; and</li> <li>• Inshes Retail Park South park is ideally located to provide the necessary provision, therefore no need for Dell of Inshes.</li> </ul> <p>Therefore considers supplementary guidance should be amended to reflect to give Dell of Inshes protection from development status.</p> <p><b>Reason for Rejection, Point 13:</b> brief should exclude Dell of Inshes site from development as a district centre as sufficient land for expansion is provided at vacant</p> |                                |

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|                           | sites at Inshes Retail Park South.  |   |
| <b>A Kidd</b>             | <p>Questions why much of content of the brief discusses areas outwith its boundary, for example Raigmore Hospital entrance, Fluke Roundabout, Inshes Overpass and Inshes Junction.</p> <p>Considers brief should also mention Transport Scotland A9/A96 Connections Study Option A, as Transport Scotland admits it was a mistake to state that Option A is unlikely to go ahead. Urges Council to lobby Transport Scotland to proceed with Option A as none of the others provide a direct link in both directions. Considers an amended version of Option A to single carriageway would be the best option for Inverness and its people.</p> <p>Considers Inshes Junction Improvements proposal to change Inshes Roundabout to a four way junction defies belief as it would introduce potentially fatal T-bone collisions; goes against design guidance; would be less environmentally friendly and less efficient at dealing with traffic.</p> <p>Recommends:</p> <ul style="list-style-type: none"> <li>• existing roundabout is altered from a six to four legs roundabout by making the Police and Tesco's legs access only, considers this would improve traffic flow, have minimal disturbance and minimal costs; and</li> <li>• removal all six pedestrian/cycle crossings from the roundabout and provide a pedestrian/cycle bridge as this would improve greatly the pedestrian/cycle experience and separate cyclists and pedestrians from the traffic which would massively improve safety.</li> </ul> <p>Refers to similar junction in Holland which has a cycle/pedestrian elevated roundabout; suggest similar idea could be utilised that would provide a fantastic entrance into Inverness on the Route 1 Cycle way. Suggests money saved from the minor changes needed to alter the roundabout to four leg against providing a new four way junction would be better spent on providing Inverness with a truly state of art floating Cycle/Pedestrian Bridge, which would result would be a safer, greener, environmentally friendly and more efficient intersection.</p> | <p>The purpose of the brief is to establish a land use planning framework for development within its boundaries. It is made clear within the brief that Inshes Junction Improvements and the Transport Scotland A9/A96 Connections Study are important related projects rather than projects whose outcome is determined by the brief. Whilst the brief contains a movement strategy it is largely focussed on the delivery of development at Inshes Retail Park South, Dell of Inshes and Land South of Police Scotland.</p> <p>Other comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.</p> |

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| <b>R MacLennan*</b>  | Insists on improving links and access to the Southern Distributor Road as providing a direct link and reducing the amount of roundabout at Inshes Retail Park will help traffic flow for 'East Link' through traffic. Provides graphical illustration of suggestion.  | These comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.  |
| <b>J McEwen and W Sprunt</b>   | <p>Asserts water and flood risk prevention are of primary concern due to suffering severe flooding in 2002.</p> <p>Requests Policy 7 of the brief is amended to read 'to achieve net enhancement to the existing surface water drainage regime and attendant flood risk'.</p> <p>Concern that flood risk maps on page 6 show Old Perth Road as currently subject to medium risk of surface water.</p> <p>Questions:</p> <ul style="list-style-type: none"> <li>• How and where water/sewage from any development will be accommodated given existing antiquated combined water/sewage system and insufficient maintenance programmes;</li> <li>• How will Highland Council ensure requirements for permeable hard surfaces are enforced; and</li> <li>• Can the flood attenuation basin proposed be extended as necessary? Concerned it seems small in comparison to the size of the site at Dell of Inshes.</li> </ul> | <p>The brief contains a copy of Policy 7: Inshes and Raigmore of the Highland-wide Local Development Plan. This is an extract from an adopted development plan and it is therefore not possible to make any amendments to this text.</p> <p>The areas at medium risk of surface water flooding shown on the Water and Flood Risk Constraints map are taken from SEPA Flood Maps. It does show that areas of Old Perth Road are subject to medium risk of surface water flooding. Concerns are noted.</p> <p>In terms of accommodation of water/sewage from new development Scottish Water have confirmed that there is some capacity within the water network and that upgrades will need to be undertaken to enhance the network when new development is brought forward. This is noted in the brief, along with requirements for early engagement with Scottish Water.</p> <p>SUDS are required to be delivered as part of most new development and this will be enforced by means of a planning condition.</p> <p>The flood attenuation basin shown on the outline proposals drawings for Inshes Junction Improvements is indicative. Studies are ongoing to determine the technical specification of the attenuation basin at this location and SUDS are required to be provided on site for development at Dell of Inshes.</p> |
| <b>Graham and Sibbald (Acting on behalf of Mr &amp; Mrs Grant, per K McGuire)*</b> | <p><b>Land South of Police Scotland</b></p> <p>Notes representation is on behalf of the landowner of Land South of Police Scotland.</p> <p>Requests boundary of development brief is extended to the north include entire agricultural field (as indicated on attached map) because: land is within same ownership; site promoted for business use through the Inner Moray Firth Local Development Plan; at Main Issues Report consultation stage the Council recognised the requested extension area provides no amenity value and is commercially viable and would ensure land is developed and maintained in accordance with the principles</p>  | <p><b>Land South of Police Scotland</b></p> <p>The boundary of the development brief at this location reflects the boundary shown in the Highland-wide Local Development Plan and the Inner Moray Firth Proposed Local Development Plan. The Inner Moray Firth Proposed Local Development Plan is currently being examined by Scottish Ministers who will make a recommendation regarding all outstanding representations, including the request for the site to the south of Police Scotland to be extended. It would be inappropriate for the site boundary to be extended in the brief before the outcome of the examination is known. It is expected that the examination will be concluded in early 2015. The brief includes</p>   |

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|                           | <p>of the brief.</p> <p>Supports: flexibility for other business uses should the site be surplus to Police Scotland's requirements; aims design guidelines.</p> <p>Requests flexibility is given to access arrangements, in particular the brief should indicate that access point shown in figure 19 via Police Scotland is only required if the site is utilised for the expansion of Police Scotland operations and that should the site be developed for other businesses uses then the access arrangements should be agreed with the Council prior to any planning application being submitted.</p> <p>Opposes requirement for transfer of any land required for Inshes Junction Improvements at nil cost as this is wholly unreasonable; land is in private ownership and normal compulsory purchase procedures should be followed.</p> <p>Requests a Transport Statement should be required as a supporting document to a planning application rather than a full Transport Assessment given the size of the site.</p> <p><b>Monitoring and Review</b></p> <p>Requests that brief includes indicative timescales for completion of Inner Moray Firth Local Development Plan; Inshes Junction Improvements Phase 2 and Transport Scotland A9/A96 Connections Study.</p> <p>Also requests for client to be kept up to date of any revisions to the brief, in particular any decisions taken in relation to land requirement for Inshes Junction Improvements.</p> | <p>a statement that should the outcome of the examination result in any significant changes the sites within the brief area then the brief will be revised to reflect this at an early opportunity. Therefore, should any recommendation be made in the report of examination for the site to be enlarged, the brief would be reviewed at an early opportunity to reflect this.</p> <p>Support for elements the Land South of Police Scotland Design Guidelines is noted.</p> <p>With regards access arrangements it is accepted that this is very much dependant upon the end user of the site. As such the design guidelines for the site have been amended to indicate that the potential vehicular access point is subject to the site being used for expansion of Police Scotland and the developer requirements have been amended to read:</p> <ul style="list-style-type: none"> <li>• Shared access for existing Police Scotland building and development of land to South of Police Scotland in consultation with Police Scotland are other relevant landowners;</li> <li>• Access point dependant on end user, outcome of Inshes Junction Improvements and discussion with Police Scotland: <ul style="list-style-type: none"> <li>○ Expansion of Police Scotland: access via Police Scotland or any alternative access point proposed by future iterations of Inshes Junction Improvements</li> <li>○ Alternative business use – access to be agreed with Council prior to submission of a planning application</li> </ul> </li> </ul> <p>Text regarding any transfer of land for Inshes Junction Improvements has been amended to 'secured by agreement using established valuation principles' to address this comment.</p> <p><b>Monitoring and Review</b></p> <p>Timescales for completion of Inshes Junction Improvements and Transport Scotland's A9/A96 Connections Study are currently unknown and therefore cannot be specified within the brief. However timescales for the next stages of these projects and the Inner Moray Firth Local Development Plan are known and have been incorporated to the Monitoring and Review section of the brief.</p> |

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|  |  | The customer is contained on the Development Plans Customer Database and will therefore be kept informed of progress of the development brief and related transport network improvement projects.   |
| <b>A Menzies</b>   | Outlines that there is already storm/sewage drain interaction and flooding taking place at Culcabock. Emphasises that this is affecting property with a detrimental effect on respondents health and well being and that Scottish Water and the Council are aware of this. Consider that this existing problem should be addressed before additional development that makes existing problems worse. This has already happened as a result of Council approved development in the recent past.   | In terms of accommodation of water/sewage from new development Scottish Water have confirmed that there is some capacity within the water network and that upgrades will need to be undertaken to enhance the network when new development is brought forward. This is noted in the brief, along with requirements for early engagement with Scottish Water.  |
| <b>M Munro</b>   | <p>Distressed by traffic increases in Westhill over past 24 years. Considers two factors have contributed to this:</p> <ul style="list-style-type: none"> <li>• Council granting planning permission for thousands of houses to be built in the area with each household owing at least one or two cars; and</li> <li>• Pedestrian crossing from Tesco filling station to bus stop which is used several times a day by shoppers and employees from Beechwood Business Park.</li> </ul> <p>Suggests pedestrian crossing could be removed and an underpass installed as are in many other countries.</p>  | <p>Noted. It is accepted that there has been an increase in traffic volumes over a period of time, partly as a result of large scale housing expansion.</p> <p>Comments regarding delays to traffic due to the pedestrian crossing are noted, potential for an underpass will be explored as proposals for Inshes Junction Improvements are progressed.</p>   |
| <b>GH Johnston Building Consultants Ltd (per A Ogilvie)*</b> | <p>Disappointed with the Council's responses to comments made on the previous version of the Draft Brief. Comments on Draft Brief draw upon my previous comments and concerns.</p> <p><b>Section 1</b></p> <p>Paragraph 1.18 refers to Tree Preservation Orders and 20 metres buffer of trees - however safeguard does not seem to transfer through to proposals indicated in other parts of the brief, notably to the enlarged roundabout adjacent to Woodgrove.</p> <p><b>Section 2</b></p> <p>Considers Figure 7 is missing the active travel /green network enhancement opportunity to connect to the Inverness Retail and Business Park, via the Campus. Aware that owner of the Inverness Retail Park may not be prepared to accommodate</p> | <p><b>Section 1</b></p> <p>Potential tree impacts will be investigated when detailed designs are developed for Inshes Junction Improvements (including flood defences and attenuation) and a route option has been selected by Transport Scotland. The design guidelines in the brief make clear that there is likely to be impacts on trees as a result of development, that loss of trees should be minimised and compensatory planting may be required.</p> <p><b>Section 2</b></p> <p>The Opportunities Overview figure has been amended to include the active travel connection to the new Inverness Campus via the Golden Bridge. A future potential connection between the Inverness Campus and Inverness Business and Retail Park is indicated on the Walking and Cycling Opportunities figure. Funding for a walking, cycling and public transport link has recently been awarded to deliver this and is</p> |

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|                           | <p>this link, however alternatives should be explored along with improvements to make the Raigmore Interchange more pedestrian and cycle friendly.</p> <p>Raises following observations regarding figure 8: Walking and Cycling Improvements</p> <ul style="list-style-type: none"> <li>• missing an obvious link from the Drakies Buffer area into the cul-de-sac of Drumossie Avenue (121 to 151).</li> <li>• 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.</li> <li>• yellow star symbol at the existing crossing of Old Perth Road to Raigmore Hospital opposite Drakies Avenue should be changed to an orange star as there is a long established need to improve this crossing, particularly to allow access by all users from the Drakies area.</li> </ul> <p>Considers proposed (“indicative”) roundabout and route option under consideration as part of the Transport Scotland A9/A96 connections study (illustrated in Dell of Inshes Design Guidelines figure 14) will:</p> <ul style="list-style-type: none"> <li>• result in a significant increase in the amount of traffic in the area;</li> <li>• 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;</li> <li>• have a significant detrimental noise and visual impact on adjacent residential properties; and</li> <li>• result in loss of significant trees of local landscape value.</li> </ul> <p>Land South of Police Scotland</p> <ul style="list-style-type: none"> <li>• objects to para 2.23 which allows for alternative business uses should Police Scotland not require the site because: ignores planning policy history which clearly allocated the land for just expansion of the Police HQ/offices; expect that for operational reasons Police Scotland is unlikely to allow development by another user taking access through its site. Notes that if the Council remains consistent with its long held standpoint then further direct access on</li> </ul> | <p>anticipated to be progressed in the near future. Comments regarding barriers to active travel at the Raigmore Interchange are noted and the Council acknowledges there are issues with this part of the active travel network. Opportunities for improvements may be explored in detail by the Council and Transport Scotland in the future, dependant upon resources available.</p> <p>In terms of an active travel link between Drumossie Avenue and Drakies playing fields, this was explored as part of the Council’s Core Path Plan which concluded there would be significant constraints to delivering this link. It is therefore not considered appropriate for it to be added to the Walking and Cycling Improvement Opportunities diagram.</p> <p>Comments regarding the potential for the proposed enlarged roundabout within Inshes Retail Park to be attractive for active travel use are noted. The brief notes a number of the improvements illustrated are dependant upon several factors, for example detailed design of Inshes Junction Improvements and the outcome of the Transport Scotland A9/A96 Connections Study. Therefore as the active travel infrastructure locations are currently indicative it is not considered appropriate at this time for any edits to be made to the diagram. In the detailed design of this roundabout provision for active travel is an important consideration.</p> <p>Comments regarding improvement opportunities for the pedestrian/cycle crossing between Old Perth Road and Raigmore Hospital are accepted and the symbol for this crossing has been amended to reflect that it represents a ‘relocated/improved/new pedestrian/cycle crossing option’.</p> <p>Comments regarding the enlarged roundabout within Inshes Retail Park are noted – these issues are largely detailed transportation matters that will be explored further as part of Inshes Junction Improvements Phase 2 and Transport Scotland A9/A96 Connections Study.</p> <p>With regards alternative uses of Land South of Police Scotland should Police Scotland confirm they do not wish to utilise the site with the exception of access considerations no material planning reasons have been provided to suggest why this provision should not be allowed for within the brief. With regards to access, additional</p> |

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|  | <p>the Southern Distributor road will not be permitted;</p> <ul style="list-style-type: none"> <li>• Requests additional requirement that development will not be permitted until works associated with Inshes Junction Improvements Phase 2 are completed, in particular the connections between the existing roundabout and Drumossie Avenue must be closed off - important given history of illegal rat-running traffic; and</li> <li>• Suggests water environment requirements should be amended to check existing watercourses, in particular effect of part culverting the watercourse running along the rear of houses in Drumossie Avenue some time ago.</li> </ul> <p><b>Appendix B: Inshes Junction Improvements Phase 2 Outline Proposals</b></p> <p>Notes consultation is not on the details of the Outline Proposals however wishes to raise two factors relative to above points:</p> <ul style="list-style-type: none"> <li>• 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; and</li> <li>• 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. Attached sketch illustrates this point, requests is explored further as part of the Inshes Junction Improvements.</li> </ul> | <p>clarity has been provided in the brief for access arrangements should the site be utilised by Police Scotland or an alternative user.</p> <p>In terms of requiring Inshes Junction Improvements to be completed prior to any development at Land South of Police Scotland the brief notes that Inshes Roundabout cannot accommodate a significant number of additional vehicles generated by development that does not already benefit from planning consent. As such the principle of additional significant vehicle trips using Inshes Roundabout is unacceptable. Therefore an access solution to the site compatible with Inshes Junction Improvements would have been accepted by the Council before any planning consent was granted.</p> <p>It is considered the existing requirements the water environment, in particular a requirement for watercourses not being culverted as part of a new development unless there is no practical alternative and existing culverts opened whenever possible is sufficient for this concern to be addressed in the context of new development proposals.</p> <p><b>Appendix B: Inshes Junction Improvements Phase 2 Outline Proposals</b></p> <p>The remaining comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2. As referred to previously, comments regarding improvement opportunities for the pedestrian/cycle crossing between Old Perth Road and Raigmore Hospital are accepted and the symbol for this crossing has been amended to reflect that it represents a 'relocated/improved/new pedestrian/cycle crossing option'.</p> |
| <b>Scottish Water<br/>(per W Patton)</b> | States Scottish Water is willing work closely with the Council and developers to enable new development within the brief area. Notes comments previously provided to the Highland-Wide Local Development Plan may be useful in providing further  | Noted, many of the requirements listed were already contained within the draft brief. An additional requirement for Dell of Inshes is specified in the final brief, this is for up to date network modelling studies.   |

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|                           | <p>clarification on current treatment capacity and network requirements.</p> <p><b>Inshes Retail Park South</b></p> <p>Explains that existing retail site has not experienced any significant network problems in terms of drainage. However given length of time retail development has been in operation modelling and drainage studies will now be significantly out-dated.</p> <p>Requires:</p> <ul style="list-style-type: none"> <li>• up to date network modelling studies 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 and neighbouring residential area;</li> <li>• developers to provide on site mains extensions to service their requirements; and</li> <li>• 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.</li> </ul> <p>Recommends 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.</p> <p><b>Police Scotland</b></p> <p>Anticipates additional demands on water and waste water services will not present a significant increase to that of the current demand of site is utilised for expansion of Police Scotland operations. However, requests that when any future usage is agreed and finalised, the developer 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 site not be utilised for Police Scotland expansion the Council should make contact with Scottish Water to provide details of any alternative land class usage.</p> <p><b>Raigmore Hospital</b></p> |                                |



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|   | <p>Acknowledges that NHS Highland will remain on current site in the long term and reconfiguration is limited by the provision of Helipad services. Requests that should any reconfiguration or changes to existing buildings and services be proposed in the future, which may require the movement of water and waste water services or increasing in demands of flows, developer should contact with Scottish Water to informally discuss these matters or alternatively via their appointed Licenced Provider.</p> <p><b>Connections Process</b><br/>Notes that there is now a variety of water and sewerage suppliers to choose from called Licenced Providers, and that further information can be found at <a href="http://www.scotlandontap.gov.uk">www.scotlandontap.gov.uk</a>.</p> <p>Notes that as all sites in the brief are non-domestic, any resulting applications for connections to the water and waste water network should be carried out via one of the approved Licenced Providers.</p> <p><b>Early Engagement in Planning</b><br/>Acknowledges 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><b>Pritchett Planning Consultancy (on behalf of SWIPPT, per P Pritchett)</b></p> | <p><b>Constraints</b></p> <p>Wishes constraints figures 5 and 6 to be amended to show the existing built form rather than that proposed by Inshes Junction Improvements (including flood attenuation scheme) because: it is confusing to the reader given they are contained within the 'Area Analysis' section of the brief; proposed changes to road layout and flood attenuation scheme would result in removal of trees in the area that are shown as constraints and water and flood risk constraints will inevitably change when new road building and flood attenuation measures are in place.</p> <p>Considers figures are misleading because: figure 5 indicates there are trees within the southern section of Inshes Retail Park when there are not and 20m buffer from trees indicated in the legend appears to be inaccurate.</p>  | <p>It is agreed that it may be confusing to the reader that the area analysis constraints drawings have been overlaid with Inshes Junction Improvements Outline Proposals given this section is intended to present an analysis of the existing area. The existing road layout is shown in the constraints drawings in the final brief.</p> <p>The location of existing trees within the brief area shown on the Built and Cultural Heritage Constraints drawing was plotted with the assistance of the Council's Forestry Officers. When plotting the location of trees, trees of all sizes and ages were included. As such areas of existing trees within the southern end of the retail park which were plotted. Geographical information systems were used to generate a 20m buffer of existing trees and substantial areas of planting. No scale is provided on the drawing as it is intended to be indicative constraints map and a starting point for development proposals.</p> |

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|                           | <p>Wishes constraints figures to exclude any constraints from Inshes Retail Park South because it has an existing planning permission that is partially developed.</p> <p><b>Inshes Retail Park South</b></p> <p>Wishes brief to make clear that existing planning permission at Inshes Retail Park South can be implemented at any time and does not have to comply with the brief's design guidelines as this would not allow the extant planning permission to be completed.</p> <p>Requests requirement for Inshes Retail Park South to be completed prior to Dell of Inshes should be removed for the following reasons:</p> <ul style="list-style-type: none"> <li>• external economic and retail factors will dictate when and whether the existing consent or alternative schemes come forward;</li> <li>• should be developed as market circumstances allow;</li> <li>• leases in place in existing units at the southern end of Inshes;</li> <li>• one existing occupier on the site;</li> <li>• existing planning permission was granted with restrictive user clauses in very different economic and retail circumstances;</li> <li>• may not be in the same ownership in the future; and</li> <li>• planning and accessibility – Inshes Junction Improvements requires land outwith the Council's control and will provide access to Dell of Inshes, therefore not prudent to restrict timing of development as not based on development plan policy.</li> </ul> <p>Requests following amendments are made to design guidelines:</p> <ul style="list-style-type: none"> <li>• Brief should provide explanation that site plan shown is indicative as an operational unit (Harry Ramsdens) is present with the site plan shown.</li> <li>• delete requirement for rear building line to be maintained because: no justification, relates to rear of buildings; unknown whether new retailers will require additional space to rear of buildings; existing rear servicing area is very generous which allows for a variety of unit sizes; visibility and accessibility of store frontages critical however rear also functional; brief should not seek to restrict legitimate and potentially necessary floorspace at</li> </ul> | <p>Whilst it is accepted that Inshes Retail Park South has an existing planning permission that is partially developed this does not predicate the existence of any existing constraints on the site. In the interests of consistency and to help inform any alternative development proposals it remains appropriate for constraints on this site to be shown.</p> <p><b>Inshes Retail Park South</b></p> <p>It is accepted that Inshes Retail Park South has an extant planning permission that can be delivered at any time. The brief has been amended to make clear that design guidelines and other specified requirements for Inshes Retail Park apply only to alternative development proposals.</p> <p>The draft brief specified that Inshes Retail Park South should be completed prior to any development at Dell of Inshes for a number of reasons, including that the site lies within the existing retail and was always been a planned part of it; infrastructure and services to deliver the site are largely in place; to improve appearance of the site as it currently has poor amenity value and to reflect well reasoned community feedback to the earlier issues and options consultation. The reasons explained for the request of the removal of any phasing requirement are noted. Whilst the Council's preference remains for Inshes Retail Park South to be completed prior to commencement of development at Dell of Inshes this requirement, the brief now explains that the Council may accept a degree of flexibility with regards the phasing requirement if the landowner/applicant:</p> <ul style="list-style-type: none"> <li>• Submits a reasoned justification for early development at Dell of Inshes; and</li> <li>• Completes landscape and amenity enhancements at Inshes Retail Park South prior to commencement of development at Dell of Inshes.</li> </ul> <p>This requirement is explained within a new phasing section of the brief rather than being referred to within the text for Inshes Retail Park South.</p> <p>It is accepted that there is an operational unit within the boundary shown for the Inshes Retail Park. Given that any alternative proposals for the site may or may not include redevelopment of this unit the key on the design guidelines for this site has been amended to read 'indicative site boundary'.</p> <p>With regards to the requirement for the rear building line to be retained taking into account to reasons provided and that the rear building line of the retail park is</p> |

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|                           | <p>the rear of the buildings as long as adequate servicing areas can be maintained;</p> <ul style="list-style-type: none"> <li>• brief should only make reference to a requirement for a 20m landscaped/tree buffer at the western edge of site to be maintained; and</li> <li>• delete requirement for active travel link and associated landscaping between retail park and Sir Walter Scott Drive because: not feasible or desirable as it is not a current desire line; would cross service yard for whole retail park resulting in road safety issues; active travel routes should be around the centre linking nodal points and on existing or future desire lines.</li> </ul> <p><b>Dell of Inshes</b></p> <p>Wishes requirement for Inshes Retail Park South to be completed prior to Dell of Inshes should be removed for the reasons explained above.</p> <p>Considers design guidelines are too prescriptive and could severely curtail the overall development potential of the site in additional to the already significant encroachment into the site for Inshes Junction Improvements.</p> <p>Requests the following amendments to the design guidelines:</p> <ul style="list-style-type: none"> <li>• consistency between key views indicated on figure 14 and figure 5;</li> <li>• wishes annotation on key view B to be amended to take into account of potential for future major road infrastructure to significantly alter views of Inverness from the southern view point;</li> <li>• 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 because: it 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; area is not an 'edge' to the site but a very extensive zone of green space which will serve no useful purpose; development 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; and</li> <li>• if requirement for active ground floors and spill out space for outdoor uses</li> </ul> | <p>effectively screened by a bund and planting from Sir Walter Scott Drive this requirement has been removed from design guidelines.</p> <p>The brief now specifies that a 25m buffer should be provided between the edge of existing footpath and new built form – this is to safeguard a sufficient area should Sir Walter Scott Drive be upgraded to a dual carriageway in the future. The 25m requirement reflects a condition placed on a recent major planning permission in the area.</p> <p>The reasons provided for the exclusion of the active link shown in the draft brief are noted, particularly in terms of potential safety issues and desire lines. The reason a link was shown at this location in the draft brief was to increase the wider permeability of the retail park and therefore to support patterns of development that provide safe and convenient opportunities for walking and cycling. The brief has been amended to now show a requirement for an active travel connection adjacent to the southern entrance road to the retail park that would reflect desire lines for cyclists and pedestrians to access the retail park from the south to connect with the primary active route along the frontage of the commercial units. To minimise potential conflicts with service vehicles the location of the service access has also been amended to be within the retail park. It is also considered that by providing an internal service access road this would increase safety on the southern access road to the retail park.</p> <p><b>Dell of Inshes</b></p> <p>As explained above the requirement for phasing of the retail park has been amended to provide a degree of flexibility.</p> <p>The 'key gateway view' indicated on figure 5 highlights this view in the context of the wider area, whereas the views shown on figure 14 are in the context of the site at Dell of Inshes. It is therefore considered that given these drawings illustrate different contexts it would not be appropriate for the same views to be shown.</p> <p>It is accepted that route options for the Transport Scotland A9/A96 Connections Study have the potential to significantly impact on the views from the A9 when approaching Inverness from the south. However, given that the Transport Scotland study is at the route options stage and no decisions on a route alignment have been made it would</p> |

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|                           | <p>must remain then limit to textual reference rather than graphic because: 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 and are currently indicative graphically at the centre of the site.</p> <p>Requests following amendments to developer requirements table:</p> <ul style="list-style-type: none"> <li>• delete requirement for phasing for reasons stated previously;</li> <li>• delete requirement for land required for Inshes Junction Improvements to be transferred to the Council at no cost because: 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 and there is no requirement for such provision in the development plan; and</li> <li>• Clarify or delete requirement for costs of additional consents, order and legal agreement to be reimbursed to the Council as it is unclear which additional consents or orders will be required for the development to proceed, although accept that any Section 75 agreement associated with the grant of planning permission would be required to be paid for by the applicant.</li> </ul> | <p>be inappropriate for the brief to make reference to this at this stage. The brief specifies that if the outcome of Transport Scotland A9/A96 Connections Study has significant implications for the brief then it will be reviewed at an early opportunity.</p> <p>The extent of green area in the brief has been reduced, greater focus is given to the layout and massing of development minimising impact on key views from the A9.</p> <p>Requirement for active ground floors and spill out space have been amended to provide a greater degree of flexibility for the location of these uses and also been further explained within a design principles section of the Dell of Inshes requirements. However the principle remains for these types of uses to be provided within the frontage area of the site.</p> <p>The developer requirements table has been amended to reflect the flexibility added to the requirement for Inshes Retail Park South to be completed prior to commencement of development at Dell of Inshes.</p> <p>The requirement for land to be transferred to the Council at no cost has been amended to require: new access from Culloden Road to be delivered by: Detailed design, traffic modelling of early phase works, costing of early phase, nominal value land transfer of early phase and payment to Council of construction costs (or direct developer provision of this link) and for the remainder of land required for the provision of Inshes Junction Improvements Phase 2 Outline Proposals including flood alleviation (or any subsequent iteration) to be secured by agreement using established valuation principles.</p> <p>The requirement relating to costs for additional consents, order and legal agreements has been amended to make clear this only applies if it is solely as a result of the development.</p> |
| <b>J Shankland*</b>       | <p>Suggests relocated/new pedestrian crossing option opposite Inshes Church (shown on figure 8) should be moved along towards line of boundary between the Church and the 'playgroup' building (as shown on illustration supplied) because: would give better view of traffic from west roundabout as there are wider sightlines for pedestrians and due to speed of traffic coming round the blind corner when heading to Tesco.</p>   | <p>The rationale for the suggested location for a pedestrian crossing shown as number 2 on the Walking and Cycling Opportunities drawing as that it was located at the junction of adjacent housing estate and therefore would be in a good location to be used by residents of the housing estate to reach the retail park and further afield. The suggested relocation of this crossing is some distance from the junction with the housing estate and therefore the drawing has not been amended to reflect this. However, the exact location of pedestrian crossings will be given further consideration</p>   |

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|                           |  | by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study.   |
| 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><b>Comments on Issues and Options Consultation</b></p> <p>Considers constraints drawings are too small scale to be easily interpreted but all relevant constraints appear to be adequately considered.</p> <p>Query what is meant by active travel opportunity - questions if it is an internal service road for use by the Police.</p> <p>Suggests that the Council request bus companies to provide bus timetables at all bus stops.</p> <ul style="list-style-type: none"> <li>• Inset maps/diagrams are too small to be fully interpreted.</li> <li>• Walking times shown in walking distances diagram seem less than in reality, for example diagram suggests 10 minutes walking time from Dell of Inshes to Culcabock Junction.</li> <li>• Dell of Inshes site occupies a pivotal location with excellent links to the A9, A96 and potentially A82 – would lend itself to a more prestigious use such as a civic purpose, even relocation of the Local Authority HQ and gaining symmetry through proximity with Police HQ; Hospital and Beechwood Business Park.</li> </ul> <p>Suggests if Dell of Inshes is developed for commercial uses then:</p> <ul style="list-style-type: none"> <li>• buildings should be restricted to single storey designs to keep low visual profile and minimise intrusion when viewed from the A9; and</li> <li>• provision for formal/indoor sports recreation should be made as this is much need at this location – i.e. the centre of Inverness' population.</li> </ul> <p>Inshes Junction Improvements</p> <ul style="list-style-type: none"> <li>• Commends the outline proposal for improvement of the Fluke Roundabout junction.</li> <li>• Ambulance Junction – subject to closure of the Drumossie Avenue slip road</li> </ul> | <p><b>Comments on Issues and Options Consultation</b></p> <p>It is accepted that the constraints drawings were provided at a relatively small scale in the issues and options paper and that may make them difficult to interpret. Larger full page constraints drawings are provided in the draft development brief.</p> <p>It is accepted that it was unclear what the blue mark on the all constraints map represented. This map is not provided in the final brief and further explanation is provided on the emerging flood attenuation and defences proposals.</p> <p>An 'active travel' opportunity was illustrated in the development guidelines for the land south of Police Scotland in the issues and options paper. It was intended to show a potential walking/cycling route through the site as an improvement to the walking and cycling network in the area and not an internal service road for use by the Police. The development guidelines illustration in the brief has been amended to read 'safer, attractive, walking and cycling links between Inshes Retail Park and Old Perth Road' to make this clearer.</p> <p>Noted. It is outwith the scope of the brief to influence the level of information which is displayed at bus shelters.</p> <p>It is agreed that the size of a number of drawings contained in the issues and options paper may be too small to be meaningfully interpreted. Where appropriate larger drawings have been provided in the brief.</p> <p>The walking distances diagram shown on the Dell of Inshes development guidelines in the issues and options paper was intended to be indicative and may not accurately represent actual walking times. This is likely to be due to non direct routes and potential delays at, for example, pedestrian crossings. This drawing has not been included within the brief. It is a rule of thumb intended to illustrate, in very broad terms, a notional walking time taken for residents within this catchment to reach facilities at Dell of Inshes. It provided a useful tool at the issues and options stage but has been omitted from the brief.</p> <p>The mix of uses proposed in the brief does not include business use as suggested by</p> |

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|                           | <p>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 without any obvious benefit.</p> <ul style="list-style-type: none"> <li>• Supports the proposal to close vehicular access between Drumossie Avenue and Old Perth Road.</li> <li>• Commends closure of vehicular access to Beechwood House.</li> <li>• Supportive of the Alternative Proposal to widen the Inshes Overbridge to 2 lanes in each direction.</li> </ul> <p><b>Comments on Draft Development Brief</b></p> <p><b>Dell of Inshes</b><br/>Believes site carries a potentially high development value by virtue of its location and therefore will command a high economic rent. 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.</p> <p><b>Land South of Police Scotland</b><br/>Requests:</p> <ul style="list-style-type: none"> <li>• Building limited to height of existing Police Scotland Building; and</li> <li>• Car park 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.</li> </ul> <p><b>Road / Traffic Improvements</b><br/>Supports measures proposed in the Brief to improve traffic and pedestrian movement on Old Perth Road because one signal controlled junction would help to create a safer traffic layout along Old Perth Road. However concerned creation of a long, straight directly upon entering Drakies housing would be potentially more hazardous for residents. Suggests to counter this incorporation of traffic calming measures on</p> | <p>the respondent. This is because business use is not considered an appropriate use within an expanded district centre at Inshes. It is intended that the district centre should provide a range of shops and services for local communities.</p> <p>The development guidelines in the brief require that the layout and massing of development at Dell of Inshes minimises impacts on key views from the A9 and that built form avoids encroaching onto the green edge of the site which is most visible from the A9. It is felt these guidelines are sufficient to minimise the impact of development on these views. Restricting building to a single storey is likely to severely limit the form of development on the site and possibly be unsuitable for the mix of uses supported.</p> <p>In terms of space for formal/indoor sports recreation, the nearby Inverness Campus which is due to open in 2015 will provide a range of new indoor sports facilities for the area. As such it is not considered necessary for new facilities to be required within the brief area.</p> <p>Detailed comments regarding Inshes Junction Improvements are detailed transportation matters that will be considered further by the Council in progressing this project.</p> <p><b>Comments on Draft Development Brief</b></p> <p><b>Dell of Inshes</b><br/>Comments regarding Dell of Inshes are noted. The development plan makes clear that the acceptability of development of site is subject to benefiting the capacity of the strategic road capacity and achieving no net detriment to the existing surface water drainage regime and attendant flood risk.</p> <p><b>Land South of Police Scotland</b><br/>It is agreed that building heights at Land South of Police Scotland should be limited to a scale that is similar to the existing Police Scotland building. The design guidelines for this site have been amended to include a requirement to ‘complement scale, massing and orientation of Police Scotland’.</p> <p>Given that uses supported at the site are limited to business use it is unlikely that</p> |

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|   | <p>Drumossie Avenue in the following form:</p> <ul style="list-style-type: none"> <li>• measures and design features encouraging drivers to respect that they have entered a residential neighbourhood and therefore inhibit fast driving at junction from Old Perth Road;</li> <li>• raised table with rumble strips on Drumossie Avenue close to the new junction entrance;</li> <li>• approximately 200 – 250 m further along Drumossie Avenue, provision of a single carriageway chicane (chicanes more effective than existing speed humps which can be straddled by wider tracked vehicles)</li> </ul> <p>Opposes any removal of grass strip between the two sections of Old Perth Road because this would be detrimental to residential amenity and erode the physical character of Drakies housing estate.</p>   | <p>significant amenity issues will arise as a result of development consistent with the brief. However concerns regarding the potential impact of a car park adjacent to housing are noted; the brief requires landscaping to be provided between the site and Drakies and an additional requirement has been added for amenity of adjacent residential properties to be minimised.</p> <p><b>Road / Traffic Improvements</b></p> <p>Comments related to road/traffic improvements are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2.</p>  |
| <p><b>Goodson Associates (on behalf of Tesco Stores, per M Summers)</b></p> | <p>Understand no detailed junction capacity analysis has been undertaken and improvements are of a preliminary nature. Considers capacity is a critical consideration given proposed changes to strategic routes and increased traffic associated with sites allocated in the development plan, reserve right to comment following completion of capacity assessment.</p> <p>Considers removal of Inshes Roundabout and direct access to retail park will result in longer journey times due to several new traffic light controlled junctions, which have likely have increased levels of traffic due to diversion of strategic traffic from the Smithton Link Road. Concerned this will impact considerably on pass-by trade and make the store less attractive to existing customers.</p> <p>Requests:</p> <ul style="list-style-type: none"> <li>• capacity analysis and journey time comparisons be undertaken to indicate the likely increase in delay to customers entering I exiting the store to allow full understanding of implications; and</li> <li>• given the extra delay access to the northern part of the store car park be provided to reduce the need for customers entering from Culloden Road to travel further to the southern entrance.</li> </ul> <p>Petrol filling station enjoys a visible location on the local road network which ensures</p> | <p>Many of these comments are detailed transportation matters that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2 and by Transport Scotland in progressing their A9/A96 Connections Study. The Council understand the Tesco Stores are a key land holder in the area and Inshes Junction Improvements is likely to result in major changes to access to Tesco Stores. Additional text has been added to the movement strategy section of the brief to explain that the Council will work with interested parties, particularly landowners directly affected by the proposals, as the designs evolve.</p> <p>The request made for amendments to make Tesco and its filling station more accessible and regarding the size of flood attenuation pond are noted and will be considered in further detail and in consultation with Tesco by the Council's Development and Infrastructure Service.</p> <p>With regards to the timing of developer contributions and provision of infrastructure the brief requires all development to be consistent with the Council's Supplementary Guidance on Developer Contributions. The timing of developer contributions and provision of infrastructure will be related directly to the level of development at Dell of Inshes with regard to any increased congestion levels and potential impacts on road safety and trading of existing commercial developments.</p> |

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|  | <p>it attracts considerable pass-by trade given the ease of entry/exit. The proposed layout introduces a convoluted access which will likely impact on trade and even the attractiveness to customers of the store. Requests that a left in /left out arrangement on to Culloden Road be introduced to enhance pass-by trade and access from the northern part of the car park to ensure store customers can access the facility. Willing 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> <p>Supports maintained access to the southern part of the car park from proposed roundabout.</p> <p>Concerned with the size and location of the SUDS pond because it utilises an excessive amount of land which Tesco want to use for parking. Believes the ponds can be separated in to smaller ponds which would reduce land take and ensure an efficient system.</p> <p>Note that developer contributions will be used as a mechanism for funding road improvements. Requests 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> |   |
| <b>Transport<br/>Scotland (per<br/>D Torrance)</b> | <p>Notes brief has taken account the latest options for the A9/A96 Connections Study. Welcomes commitment to revise the brief once a preferred route for the A9/A96 has been identified. Notes in this context there are no specific comments on the content of the brief but can confirm that Transport Scotland will continue to work closely with the Council as both schemes progress.</p> <p>Provide progress update on A9/A96 Connections Study:</p> <ol style="list-style-type: none"> <li>1. currently considering the feedback from the public exhibitions;</li> <li>2. complete the appraisal that leads to a recommended option by the end of 2014;</li> <li>3. discuss recommendation with Ministers; and</li> <li>4. announce preferred route in 2015.</li> </ol> <p>Notes thereafter there is a considerable amount of work to be done to develop the</p>   | <p>Noted. The Council is committed to working closely with Transport Scotland as both the A9/A96 Connections Study and Inshes Junction Improvements Phase 2 progress. The timescale for the announcement of a preferred route have been added to the brief.</p> |



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|   | <p>design of the option and secure the relevant authorisation and that progress of the scheme is dependent on Ministerial approval and funding being available, typically process would be:</p> <ol style="list-style-type: none"> <li>1. Design Manual for Roads and Bridges Stage 2 assessment - refines the preferred option resulting in the selection of a preferred route alignment. Anticipates this route alignment being announced in 2015;</li> <li>2. Design Manual for Roads and Bridges Stage 3 assessment - includes developing the preferred route alignment in detail, undertaking an environmental impact assessment and land required for the construction and maintenance phases is identified – typically takes some 18 months; and</li> <li>3. Statutory process phase - draft Orders, Compulsory Purchase Orders and an Environmental Statement are all published for formal consultation.</li> </ol> <p>Notes programme 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> |  |
| <b>Inshes Church<br/>(per R<br/>Wakeling)</b> | <p>Interested in provision of lighting and footpath on lane between Briargrove Drive and Inshes Tesco car park because it is used regularly and can be dangerous during dark months of the year. Notes footpath may involve constructing a culvert to contain the flow in the adjacent burn. Requests information on any plans being made for above suggestions.</p> <p>Notes new lighting was installed recently along the lane between the bottom of Briargrove Drive and the top of Briargrove Drive, wonders why this was not extended to the busier part of the lane between Briargrove Drive and the shopping area.</p>   | <p>This lane is currently a single track road that provides vehicular access to properties at Inshes Holdings. It is also a well used pedestrian route that connects to the housing estate at Woodgrove Crescent and further afield. Transport Scotland A9/A96 Connections Study route options C and D propose to connect to this single track road as do the Outline Proposals for Inshes Junction Improvements. This road would be required to be upgraded to accommodate additional traffic as part of these schemes. A pedestrian/cycle route would be provided as part of any upgrade. These comments will be passed to relevant Council officers to consider any potential for segregated pedestrian provision and lighting in the shorter term.</p> |
| <b>G Watson</b>                               | <p>Considers it would be helpful if coming from Culloden that the over bridge be extended to two lanes to help improve traffic flow.</p>  | <p>Noted. This comment is a detailed transportation matter that will be considered further by the Council in progressing Inshes Junction Improvements Phase 2.</p> <p>The Council is currently working with Transport Scotland on progressing studies to establish if technical specifications to provide additional lanes on the Inshes Overbridge can be provided.</p>   |