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Our Ref: HWLDP-EX1:4
Your Ref: LDP-270-3
Date: 16 August, 2011

Dear Ms Smith,

**HIGHLAND WIDE LOCAL PLAN - REQUEST FOR FURTHER INFORMATION –
ISSUE 18 NAIRN SOUTH**

I write in response to the request for further information of 5 August 2011 in regard to the above Schedule 4 statement and offer the following response.

The HITRANS response referred to within the Pre-application advice pack 10/04966/PREAPP relates to a representation made by HITRANS to the consultation on the Highland wide Local Development Plan: Main Issues Report (MIR). Further representation was not received from HITRANS during the later consultation on the Proposed Plan, as such the list of representations on the Schedule 4 does not include HITRANS.

Comments contained within the Pre-application advice pack 10/04966/PREAPP were received from HITRANS in direct response to the pre-application advice service consultation on this application. These comments do largely reflect the points made previously to the MIR consultation.

For information we have attached the representation HITRANS made to the Highland-wide Local Development Plan: Main Issues Report.

I trust this response meets the requirement set out in the original request.

Yours sincerely

Brian MacKenzie
Principal Planner
Development Plans Team

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HIGHLAND WIDE LOCAL DEVELOPMENT PLAN

MAIN ISSUES REPORT

Comments from HITRANS

HITRANS, as a Key Agency, would wish to thank The Highland Council for this opportunity to comment on the Issues Report published in August 2009 for the Highland Wide Local Development Plan. The Partnership offers the following comments on the views for consideration.

GENERAL

In relation to growth around Inverness and in the A96 corridor it is particularly important that active travel and public transport use is encouraged to help reduce CO2 emissions as development proceeds. Park and ride, bus priority, transport interchanges and defined active travel routes are essential in the early stages. It is also important to advance master planning and transport modeling in tandem to ensure that development can be phased effectively with infrastructure provision.

In the Cromarty Firth the potential for a new marine/rail/road interchange should be considered. Also the industrial areas should be provided with good public transport and active travel links

In Caithness improved road and public transport links to the ferry routes to Orkney, both at Scrabster and Gills Bay, should be identified as Main Issues.

Generally the Plan should strengthen reference to the policies and themes of the Regional Transport Strategy and there should be ongoing opportunity and commitment for a closer consultation arrangement with HITRANS as the Plan develops.

The Issues Report contains three main sections on:

- the Council's Vision;
- the spatial strategy for the growth areas;
- the policy options for the whole of the Council's area.

The main issues raised in the report appear to have been identified following discussion with key agencies such as Scottish Natural Heritage and the Scottish Environmental Protection Agency.

It is unfortunate that HITRANS, as a statutory consultee, has not been involved until this publication stage. We should have welcome this consultation and seek further opportunity to comment as the Highland Wide Local Development Plan proceeds.

VISION

Set out in the Council's Corporate Plan the vision is by 2030 to have sustainable communities balancing growth and economic development in a fairer and healthier Highlands. The objectives of the Highland Wide Local Development Plan are based on the Single Outcome Agreement.

Comment - HITRANS agrees with these outcomes which include:

- *encouraging walking, cycling and public transport to help reduce CO2 releases;*
- *helping to deliver transport infrastructure improvements in line with the Council's Local Transport Strategy and the Strategic Transport Projects Review;*
- *using developer contributions, linked to Council and other agency programmes, to deliver the plan strategy.*

SPATIAL STRATEGY for GROWTH AREAS

These are the key development areas in Highland for the period 2011 to 2021. They comprise the city of Inverness; the A96 corridor between Inverness and Nairn; Caithness and North Sutherland; Easter Ross and Nigg.

City of Inverness – a number of major development sites in the current Local Plan are still to be developed. These are largely on the south and west edges of the city. Major growth areas at Ness side and Charleston and are held up by the lack of a road crossing the River Ness and Caledonian Canal linking them to the southern distributor road.

The preferred option is:

- to update the vision for the future of the city in consultation with Architecture and Design Scotland and to identify the key development sites and infrastructure pressures.
- to prioritise the phasing of the development of these sites so that the existing plans for the growth of the city to 2011 are completed before there is major expansion in the A 96 corridor.
- to support the priorities for road improvement, public transport, cycling and pedestrian facilities that are emerging in the Local Transport Strategy which is being prepared in parallel with this Plan.

Transport improvement to alleviate the Inshes roundabout bottleneck and the opening up of the Beechwood university campus site by the A96 - A9 link are other key elements for early development in the city's spatial strategy.

Comment - Although the Scottish Government has included the A96 – A9 link in the Strategic Transport Projects Review, the Council under current programme proposals will need to fund entirely the River Ness/Canal crossing to link the southern distributor road with the A82. This funding is not in the Council's current capital programme. Development in the Ness Castle and Charleston areas should not go ahead without this link because of the pressure that this would put on the city centre road system creating

additional congestion. It is important not to delay opening up opportunities in the A96 corridor awaiting completion of these city sites. This might slacken the commitment from and pressure on Scottish Government to dual the A96 between Inverness and Nairn.

A96 corridor Inverness to Nairn – this is identified in the National Planning Framework² as an area for co-ordinated action. The Council has prepared a draft framework for development in the corridor following a substantial period of consultation during 2007 which included contributions from HITRANS

The key developments in the corridor comprise:

- expansion east of the city of Inverness;
- expansion west and south of Nairn;
- a new community, business park and station at Tornagrain/Dalcross Airport;
- a new community at Whiteness (the former Ardersier fabrication yard);
- dualling the A96 and by-passing Nairn.

The Council's preferred option is to support early (2011-16) development in the corridor before major transport infrastructure is complete, in particular A96 dualling and Nairn by-passing. This would be subject to commitments in principle from Transport Scotland to a programme for this work linked to amounts of development allowed to proceed in the programme time periods.

Comment - early development in the corridor should be subject to prior implementation of public transport improvements and traffic management measures including park and ride and bus priority to reduce peak time congestion. Capacity studies should be undertaken at key junctions. Transport modeling and detailed master planning of the key development sites should be progressed now to avoid uncertainty. This is particularly important for A96 dualling alignment and junction arrangements east of Inverness, at Nairn, and Tornagrain.

Developer Contributions - the Council proposes a developer contributions protocol which will be reviewed in the light of current economic circumstances.

Comment - HITRANS would wish to be involved in this protocol review because it will have wider implications and should be included in subsequent RTS Reviews. The economic circumstances of the private development industry are unlikely to return to pre 2008 levels for many years, therefore these contributions should concentrate on assisting with public transport rather than expensive arterial road works.

East of Inverness - a detailed plan is included for the expansion east of the city of Inverness. Key elements are:

- The delivery of the A96 – A9 link and the Beechwood campus as immediate priorities.
- Further development at the retail park and Stratton might proceed in the period 2011 – 16 prior to major improvement of A96.
- The Smithton park and ride site is included.
- Also a rail halt/public transport interchange is proposed at Beechwood.

Comment - If further development is to proceed prior to A96 dualling it is important that bus priority and park and ride are in place before any significant expansion east of the city. Also active travel links between this area and the city should be identified and

progressed early in the plan programme. New developments must be designed to encourage modal shift from the car to active travel and public transport. The rail halt site may need to be reconsidered because of the gradient of the line as it climbs out of Inverness.

Nairn - a detailed plan is included for the expansion of Nairn. Key elements include:

- a preferred by-pass route.
- long term expansion south of the railway line with a new junction on to the bypass, and to the west on the seaward side of the current A96.
- priority for early development at Sandown to the west of the town and in the Lochloy/Kingsteps area to the east.
- allowing some development to take place in all the expansion areas during 2011 – 16 prior to by-pass completion.

Comment - Significant development is proposed in expansion areas to the south of the town and the railway line, inside the preferred line of the by-pass. There is only one connection between this area and the town centre via a narrow rail under bridge at the station. Better connection is required from central Nairn with its employment, retail and community facilities to this expansion area to deliver the vision of encouraging active travel and reducing CO2..

A public transport interchange should be provided at the station with improved parking, cycle and pedestrian access and cycle storage.

An options appraisal of the line of the by-pass should be undertaken by the Council with Transport Scotland.

Tornagrain – an outline plan is included and it is proposed to support early (2011-16) development phases here in advance of major infrastructure.

Comment - No details are given of the relationship between Tornagrain and the airport business park, the station at Dalcross, and the A96 dualling route. It is important that these relationships are agreed before any early development.

Good public transport provision must be available from day one.

Caithness and North Sutherland – the Pentland Firth offers huge potential for the development of marine renewable energy and the Council intends to enable and support the delivery of on-shore facilities, services and sites to help realize this potential. The main priorities of the Caithness and North Sutherland Regeneration Partnership's Strategy will be included in the Local Development Plan. These include:

- development of Scrabster harbour to service marine renewables and west of Shetland oil.
- improvement to the A9 particularly at Berriedale.
- improved public transport journey times to Inverness.
- freight trans-shipment facility at Georgemas

Comment - Improved road and public transport access to the Gills Bay terminal for the ferry service to Orkney should be included.

Easter Ross and Nigg –NPF2 identifies the Cromarty Firth as an international gateway and deepwater opportunity. The Local Development Plan includes the Nigg yard as a strategic development site and supports the economic development of other strategic sites on the north shore of the firth.

Comment - The potential for a marine/rail/road interchange should be identified. Improved rail freight capacity and rail access to Nigg should be included. Good public transport and pedestrian and cycle routes should be provided to these strategic sites.

POLICY OPTIONS for the HIGHLAND WIDE AREA

These cover a wide range of issues for housing, sustainable communities, rural land use, the environment, energy and waste, business and industry, and transport. Policy options that are of interest to HITRANS are considered below.

Renewable Energy – it is proposed to identify broad areas of search where different types of renewable energy could take place. It is also proposed to identify potential locations for infrastructure relating to land based support for marine renewables and manufacture, assembly and maintenance of renewables plant and equipment.

Comment - HITRANS is undertaking research into the transport requirements for renewables development and would wish to work closely with the Council in identifying these areas of search and support locations. HITRANS would recommend that The Highland Council investigates means on maximising the opportunity for local community benefit from not only on shore renewables but also their off-shore counterpart as this in time could become a significant production sector.

Waste management – the preferred option is to direct waste management facilities to industrial sites, but also to include the potential of energy from waste in major housing and commercial sites for example for district heating.

Comment - Waste management should minimize the need for long distance road transport with its inherent environmental impact and consider the potential of rail or waterborne transport for necessary long distance movements. There should be an appraisal of the carbon impacts of the options for the management and transport of waste.

Business and Industrial land – the preferred option is to identify strategic sites for economic development and also to encourage mixed use by co-locating housing and business development.

Comment - It is important that all sites be served by good public transport links, and also by pedestrian and cycle routes where located close to existing communities.

Accessibility and Transport – the pattern of development should reduce the need to travel, facilitate public transport, walking and cycling, and encourage freight movement by rail and water. The Local development Plan and the Local Transport Strategy will be taken forward together. The draft LTS is available for comment. Key points are:

- LTS objectives and policies to be included in the Plan
- Design of new development must allow for sustainable transport choices.
- The Plan should identify priority routes to improve investment opportunities
- Seek financial contributions from new developments towards transport projects in the LTS or STPR
- Maps identify key air and ferry links; the Inverness Transport Strategy; and the Highland Wide Transport Strategy.

Comment - Reference should be made to RTS policies and themes. It is important that there is an understanding and explanation of how the Government's carbon reduction targets will be met during the period of this Plan. The Transport Strategy maps should be consistent with the RTS transport hierarchy and strategy maps. Key links to other Council areas should be identified with any support requirements at the Highland end. Broadford Airport should be identified in this section as a potential key air link. The findings of HITRANS air services review should be included when available following that review's current consultation phase.

Dave Duthie
Partnership Director
HITRANS
20 October 2009