The Highland Council
Comhairle na Gàidhealtachd

Inner Moray Firth Local Development Plan Transport Appraisal

Plana Leasachaidh Ionadail Linne Mhoireibh A-Staigh Measadh Còmhdhail

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Contents

Introduction

Everyone in Highland should have fair and equal access to affordable ways to make sustainable everyday journeys. This means walking, cycling and public transport (sustainable transport) should be the safest, most efficient and reliable choices for moving around. Delivering such a sustainable transport network for the Inner Moray Firth area is key to tackling the climate and ecological emergency and supporting the growth of Highland's most populated and urbanised area.

The Highland Council (THC) is preparing a new local development plan, the Inner Moray Firth Proposed Local Development Plan 2 (IMF2), to replace the currently adopted Inner Moray Firth Local Development Plan, 2015 (IMF1). This Transport Appraisal has been prepared to support the IMF2 following the DPMTAG process.

Whilst the IMF2 shows some changes in the land allocated for future development when compared with IMF1, the fundamental spatial strategy and pattern of land that is allocated for development has not changed significantly. Therefore a Level 1 DPMTAG Transport Appraisal has been prepared, based primarily on qualitative information and informed by the quantitative approach used in the Transport Appraisal undertaken for IMF1. This means that the Moray Firth Transport Model, which was used to inform IMF1, has not been updated to inform this Transport Appraisal. This is an appropriate approach because the required interventions on or affecting the Strategic Transport Network identified in the IMF1 Transport Appraisal are committed within current national transport investment plans and are designed in sufficient detail, as explained in this document. Transport Scotland has confirmed the appropriateness of this approach at Main Issues Report stage (See Appendix 1), and THC has provided further detail about potential impacts on the Trunk Road network (See Appendix 2).

Developing the Plan Vision and Options

IMF2 sets out a preferred Vision and Spatial Strategy for the Plan. This reflects the transport hierarchy set out in various national policies which is best illustrated by the National Transport Strategy 2 (Figure 1).

IMF2 sets a vision that this part of the Highland region should be an exemplar of sustainable transport, served by an efficient multi-modal transport network where the potential for shifting to sustainable travel is maximised. It proposes an ambitious new Transport Strategy (Figure 2), sustainable transport policy and suite of interventions to realise this vision.

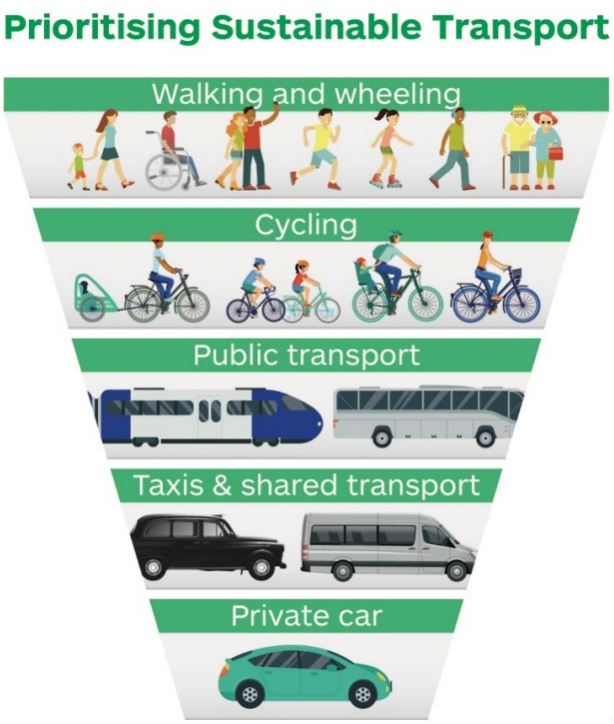

Figure 1: NTS2 modal hierarchy

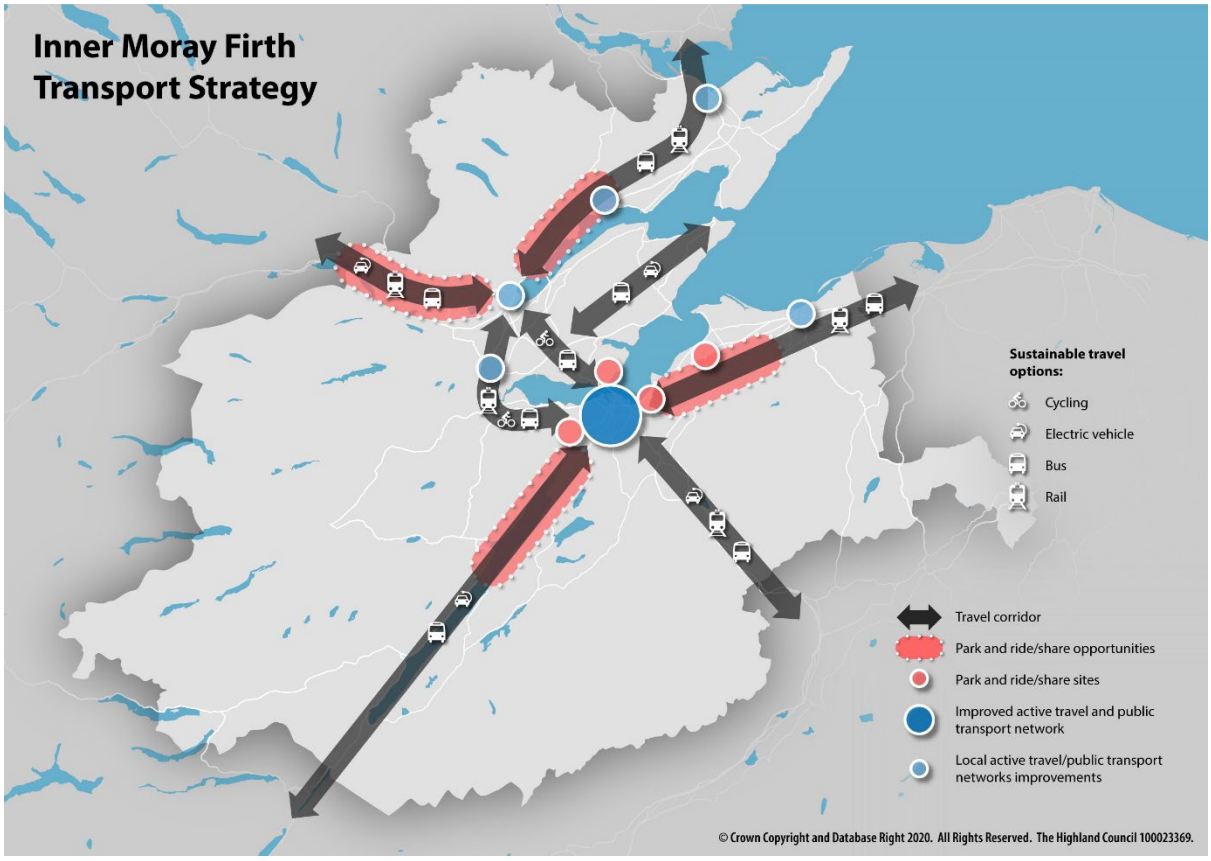

Figure 2: Draft IMF Transport Strategy

Transport Appraisal of IMF1

The Transport Appraisal prepared for IMF1 explained that significant growth was being experienced in the Plan area. It recognised that the transport network had potential to facilitate sustainable, multi-modal transport but also that there were specific road-based transport requirements to support the growth envisaged by the Plan. These requirements centred on roads in and around Inverness as illustrated in Figure 3, which shows the key congestion points on the network from the base transport model. Figure 4 shows the key congestion points as modelled for 2031, after a range of interventions are implemented and development envisaged by IMF1 is delivered. The full details of the modelling work undertaken for IMF1, which form part of the evidence base for this appraisal, are available online. The modelling undertaken for IMF1 assumed a high growth in motorised traffic being generated by development, however contemporary thinking about development and traffic growth suggests this approach is no longer appropriate, see, for example, "CIHT- Better planning, better transport, better place". Another key point to note that emerged from this modelling work is that, even with the proposed investment in road capacity improvements, congestion remains an issue at various points across the network by 2031.

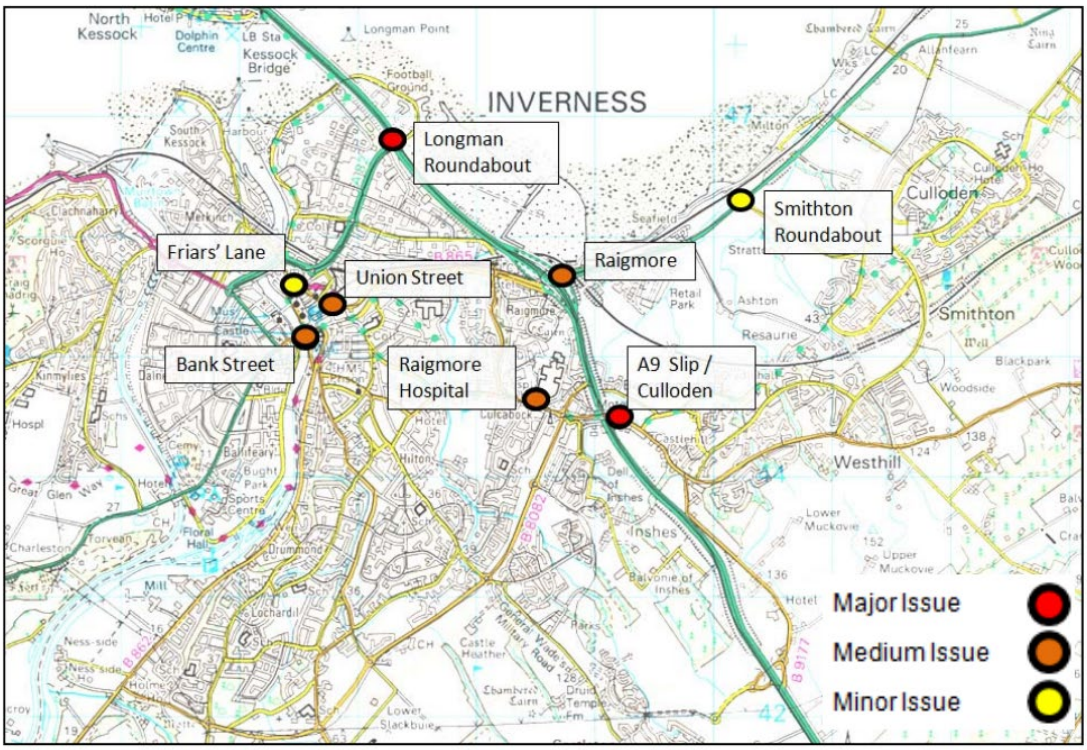

Figure 3: IMF1 Transport Appraisal congestion points

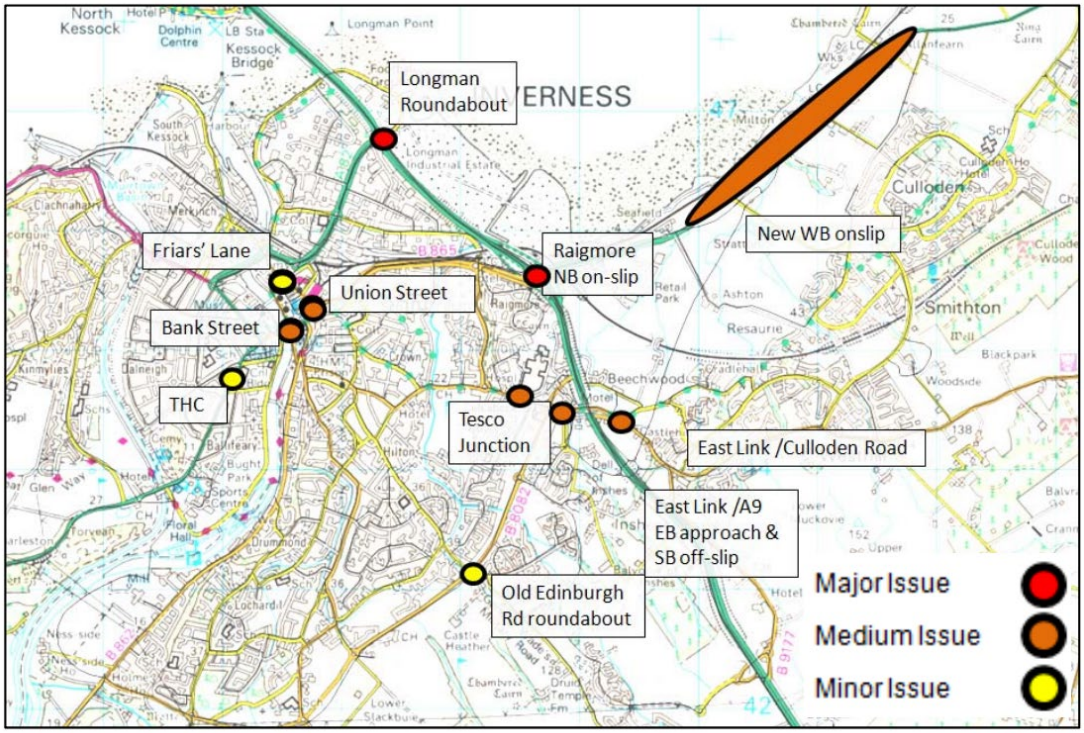

Figure 4: IMF1 Transport Appraisal congestion points modelled for 2031

The AECOM Moray Firth Transport Model (MFTM) report that accompanied the IMF1 Transport Appraisal also acknowledges this issue. It explained that, even with significant road infrastructure investment, constraints on the network will emerge from new development, and that road construction, whilst vital to the region, is not wholly sustainable. The report suggested that alternatives to car-based travel should form part of the strategy to tackle congestion, including:

- Incorporating bus and cycle lanes into the network
- Locating park and ride facilities on strategic routes into Inverness
- Improved bus information via technology
- Parking strategies

In 2018 Transport Scotland commissioned a traffic count at points across the Inverness transport network, summarised in Figure 5. These data show that, of the areas surveyed, the busiest routes on the network and junctions with the greatest number of total turning movements are generally consistent with the areas forecast to experience congestion by the MFTM.

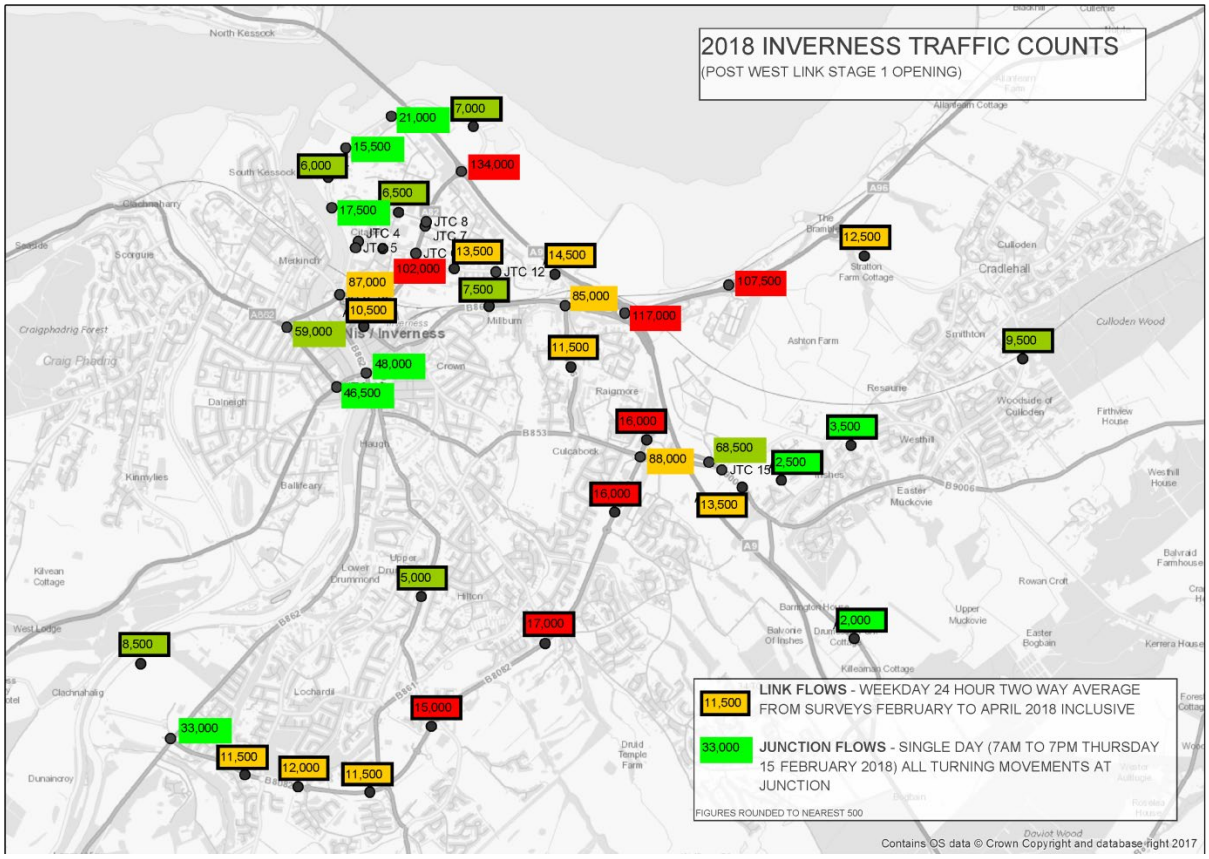

Figure 5: Inverness 2018 traffic count summary

The IMF1 Transport Appraisal sets out a strategy and suite of interventions on the network to address these issues, however car-based travel continues to dominate travel behaviour in the Plan area and therefore achieving increased non-motorised mode share towards healthier, more sustainable travel and mitigating and adapting to climate change and congestion remain unresolved issues for IMF2.

Interventions identified for IMF1

IMF1 explained that *a fundamental element of the vision … is to enable more efficient forms of travel… encouraging a further shift to more sustainable forms of travel*. It recognised the range of key committed projects across the Plan area (e.g. A96 and A9 dualling) and also lists a suite of major transport improvements. It explains that developers will be required to contribute to their delivery where they are identified in the Plan or by a Transport Assessment in support of a proposal. The Draft Transport Appraisal that accompanied the IMF2 Main Issues Report summarised the latest progress on the interventions identified. In summary, progress had been achieved on road-based interventions, whilst only a handful had progressed for active travel or public transport. A clear and sustained shift has already started towards supporting more sustainable travel modes at national and local level. Coupled with national and local climate and ecological emergency declarations, this has led to the focus must remain in IMF2 on sustainable transport.

Growth forecast

The spatial pattern of growth that was predicted by the IMF1 transport appraisal has occurred, and development within the IMF area continues to dominate the Highland region's total: In 2021 76% of all house completions in Highland were within the Plan area where 64% of the Highland population live (based upon NRS 2016 Mid-year Estimates). The IMF2 housing supply targets are shown in Table 1. These figures are derived from the recently published Housing Needs and Demand Assessment, which has received 'robust and credible status from Scottish Government's Centre for Housing Market Analysis. A simple comparison with the IMF1 figures (Table 1) illustrates that the IMF2 targets are considerably lower than the level of development planned for in IMF1. This means that the overall rate and demand for new development will be less than what was envisaged in IMF1. Nevertheless, recent trends indicate that Inverness-focused demand for new development will continue and therefore pressures on the transport network in this locality will remain.

Housing Market Area	IMF1 Housing Supply Target (20 years)	IMF2 Housing Supply Target (20 years)
Inverness	15,842	5,726
East Ross	3,284	752
Mid-Ross	3,530	1,356
Nairn	2,500	515
Wester Ross (Part)	290	114

Table 1: IMF housing supply targets

IMF2 Objectives and Transport Strategy

The interventions identified in the Transport Appraisal for IMF1 form the basis of the objectives of IMF2. The objectives centre on delivering a radical step change to sustainable travel to transform how people move around the Plan area. This approach is aligned to the Scottish Government's National Transport Strategy and has cognisance of the 20% reduction in car kilometers by 2030, drive toward delivery of 20-minute neighbourhoods and outcomes of the Strategic Transport Projects Review (Highlands and Islands Region Final Report):

1. **The need to travel is reduced**- most day-to-day needs can be met close to where people live or work and working from home is easy and convenient
2. **Walking, wheeling and cycling are the easiest ways to make most journeys**- people can walk, wheel and cycle using safe, convenient well-designed footpaths, shared paths and bike lanes
3. **Public transport is the easiest way to make longer journeys and the logical choice for those that can't use active modes**- buses, trains and shared transport run regularly on convenient routes providing affordable services
4. **A transition to the use of electric vehicles for other journeys is supported**- public charging infrastructure is provided across the Plan area to support rural communities and others that need to travel by car to do so more sustainably

5. **Committed and strategic road improvements are delivered**- trunk and strategic local road network improvements deliver safety improvements and increase efficiency of the existing transport network

The main outputs from this Transport Appraisal are a new transport policy, strategy and list of tools to deliver interventions, all of which are contained within IMF2. The new policy provides a criteria-based approach to determining planning applications that centres on making sustainable travel as, or more, competitive than using a private car. The following sections provide more detail on how each transport objective is being addressed.

Objective 1: the need to travel is reduced

This objective is addressed primarily by where new development is located:

The spatial strategy in IMF2 has been strongly influenced by considering sustainable travel and access to services, facilities, employment and education opportunities. This approach has influenced the hierarchy of settlements, which determines what places should accommodate what levels of future development, which in turn determines what sites to allocate for new development. The places offering the greatest number of services and facilities are generally favoured for the greatest amount of future development.

Following this settlement hierarchy and incorporating sustainable transport as a central component of the site assessment process (Table 2) used to identify the sites to be allocated, IMF2 has taken sustainable transport into account in every site decision. The details of the assessment for each site is available online in the Strategic Environmental Assessment Revised Environmental Report, which informed all of the transport content of IMF2.

IMFLDP Site Assessment: Sustainable Transport Topic
Will this proposal require significant new transport infrastructure?
Will this proposal increase the need to travel by car, increasing carbon emissions and therefore exacerbating climate change? i.e. will it hinder the delivery of the modal hierarchy: Walking; Cycling; Public Transport; Freight; Car share/taxi; Private Car Will the development of the site impact on core paths and other active travel networks that could reduce the attractiveness of carbon neutral travel options (inc.. pedestrian priority/desire lines)?

Table 2: Site assessment extract

Investment in digital connectivity will make a significant contribution to reducing the need to travel. The Inverness and Highland City Region Deal project 'City Region Deal Digital' is expanding digital connectivity across Highland to make it the most connected rural region in Europe. The project aims to deliver superfast broadband, mobile connectivity, business adoption and digital access. This work is being led by Highlands and Islands Enterprise and is funded by UK Government with a budget of £20 million. This investment will make it easier for people to work and do business more flexibly, meaning working from home and other, closer places will be realistic options that will reduce the need to travel. The Covid-19 Pandemic has required and demonstrated the viability of mass home-working. Lessons will

continue to be learned on how this can form part of everyday life as we recover from the pandemic, but the experience will likely increase the potential for home or hybrid home working models to be more commonplace, therefore reducing the need to travel.

Objective 2: Walking, Wheeling and Cycling are the easiest way to make most journeys

A study (the Modal Shift Strategy) was commissioned by THC and HITRANS to understand the travel mode share in the Plan area and investigate what the most viable, effective options are for achieving a shift towards sustainable travel. The aim of this work was to provide evidence to root the plan in the sustainable travel hierarchy reflected in NTS2 and explicitly recognised through the themes identified in Transport Scotland's Strategic Transport Projects Review (Highlands and Islands Region). The Modal Shift Strategy concluded that there was no single definitive measure of mode share for the Plan area but rather a range of sources and therefore estimates (Table 3).

Source	Range				
	% walk	% cycle	% car	% bus/rail	% other
Scottish Household Survey for Highland	9-20	2	75-81	2-4	1-4
Moray Firth Transport Model			95-98	2-5	
HUSS	20-63	0-19	0-35	2-74	
Transport assessments	3-31 and also 59 for a school	0-7	56-89 for houses and 10 for a school	7-19 but 40 for a care home	1-5
Derived from accessibility indicators, population and household survey data	11-16	3-4	74-80	2	3

Table 3: IMF area mode share range

The Modal Shift Strategy estimated that, due to the combined effects of an increase in average age and a decrease in car ownership because of a shift to demand responsive transport services, there is potential for 42% of all trips in Inverness to be by non-car modes by 2030 (Figure 6). If a greater range of interventions to the network, including a new transport planning policy, were made for non-car modes, there could be an even greater shift

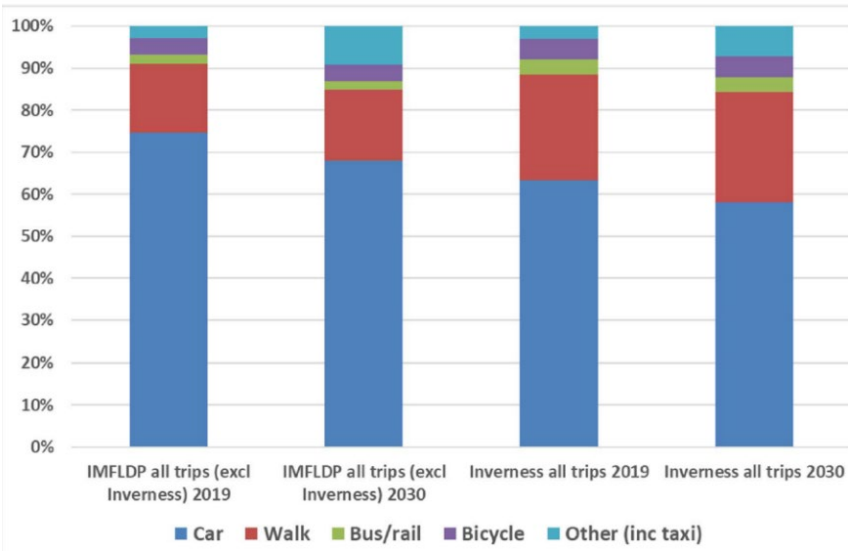

Figure 6: mode share and future potential

to more sustainable modes. Based on the findings of the Modal Shift Study there is clear potential for the Plan area to transition to a greater share of sustainable transport modes, and thus have a positive impact on a range of transport issues. The potential to increase mode share for walking and cycling are dictated by where new development is, in relation to where people want to go (Objective 1); how attractive the transport network is for walking and cycling, and how competitive these modes are with driving (Objective 2).

SUSTRANS published the BikeLife Inverness report in March 2020. This report highlights a suite of statistics that indicate the current and future potential of cycling as a mode of transport, including the finding that cycling in Inverness currently takes up to 3,200 cars off the road each day. However, it also reports that 61% of Inverness residents don't think that cycling safety is good. The report recognises shortcomings in how the network functions for people walking and cycling, including a range of inequalities related to gender, disability, and age (Figure 7). It also indicates that residents believe that improving streets for walking and cycling would make their area a better place to live, work or visit (Figure 8).

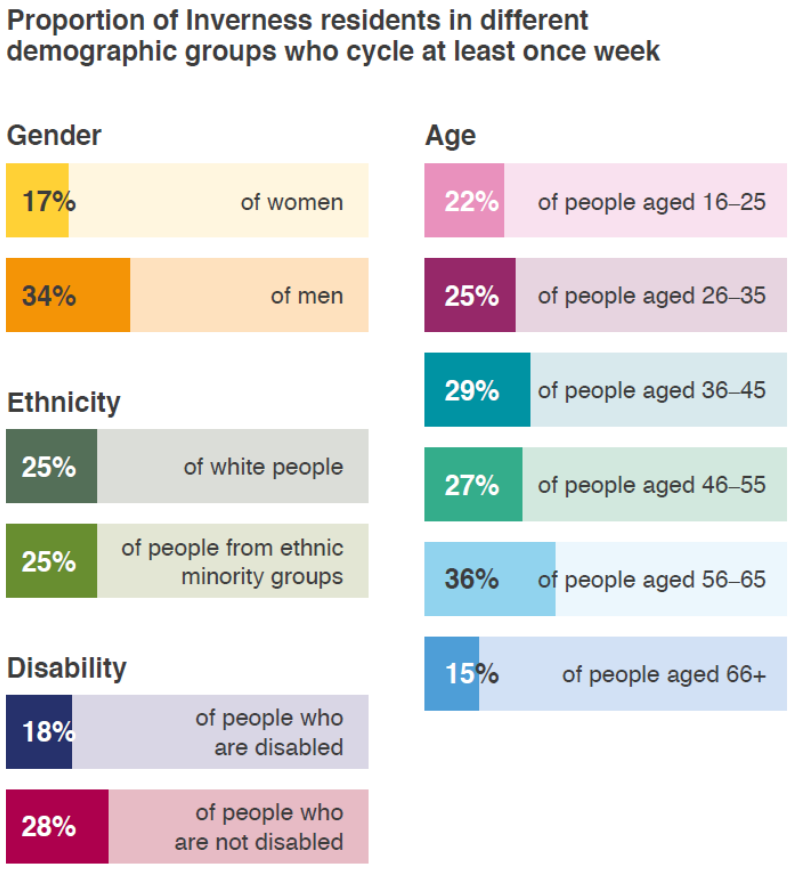

Figure 7: Cycling habits in Inverness

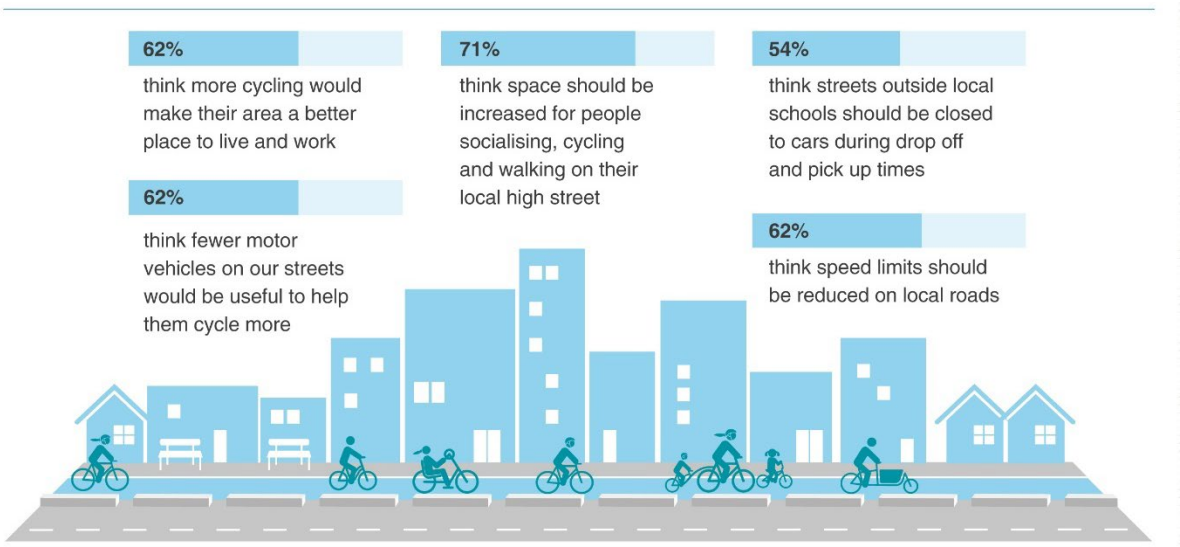

Figure 8: Inverness resident's aspirations for cycling

When considering how safe different modes of travel in the city are, the report highlighted that people think safety of driving is the least in need of improvement, with all sustainable modes considered to be in greater need of improvement and cycling in particular (Figure 9).

Whilst restricted in scope to Inverness, the Bike Life report provides valuable insight into the current state of active travel in the most urban and populated part of the Plan area (and Highland). It also highlights that there is clear public expectation that more should be done to improve provision for sustainable modes of transport.

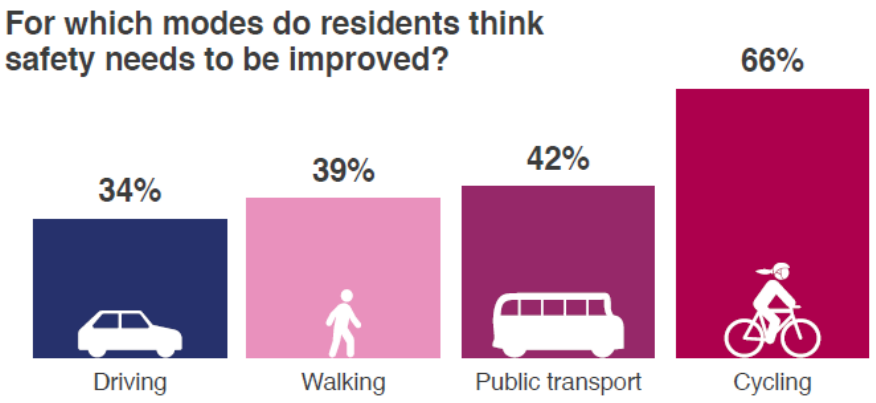

Figure 9: Safety needs in Inverness by mode

Funding has been provided in recent years across the Hitrans partnership area from a range of sources to deliver active travel improvements, which is supporting communities to adopt more sustainable travel modes. IMF2 identifies the Active Travel Network within (Figure 10) and between settlements (Figure 11) in the Plan area. This network is based on up-to-date Active Travel Masterplans that were commissioned in partnership with Hitrans and prepared for Alness; Dingwall; Invergordon; Inverness; Tain and Nairn, with smaller places' networks defined by identifying the important active travel routes linking key destinations.

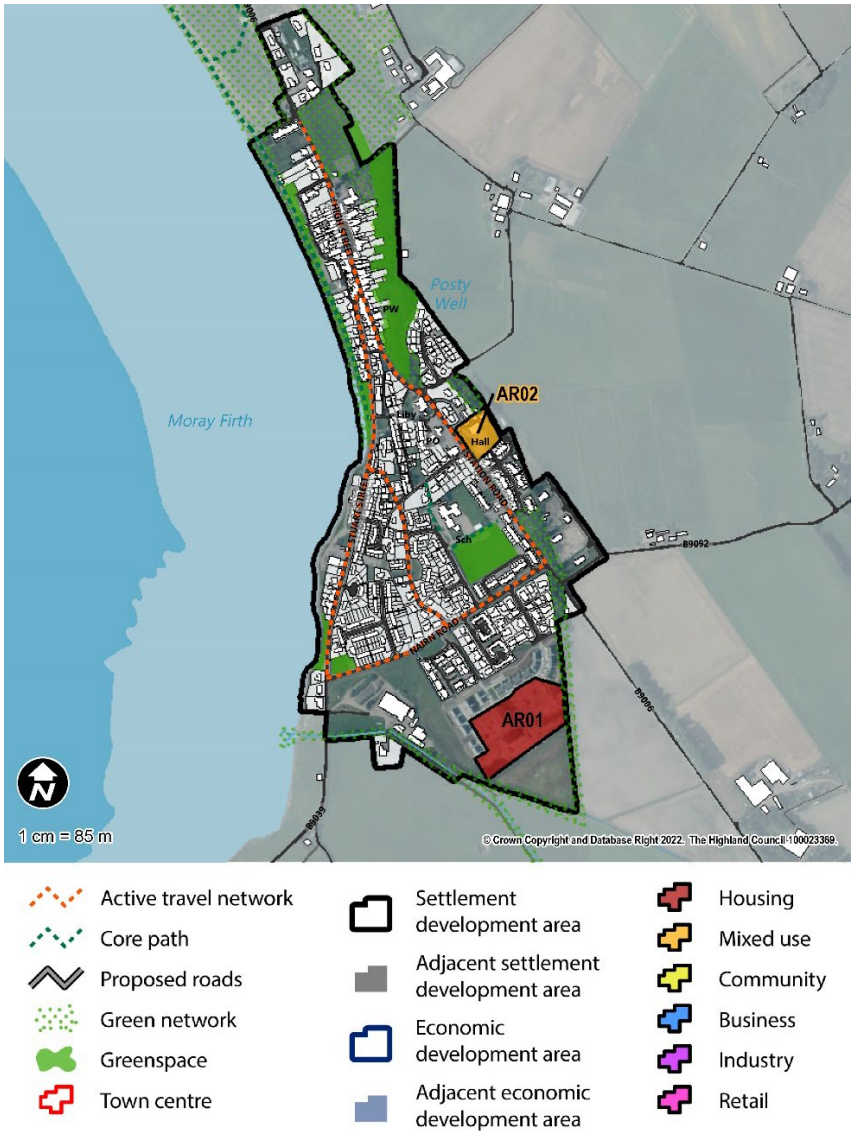

Figure 10: Active Travel Network within Ardesier

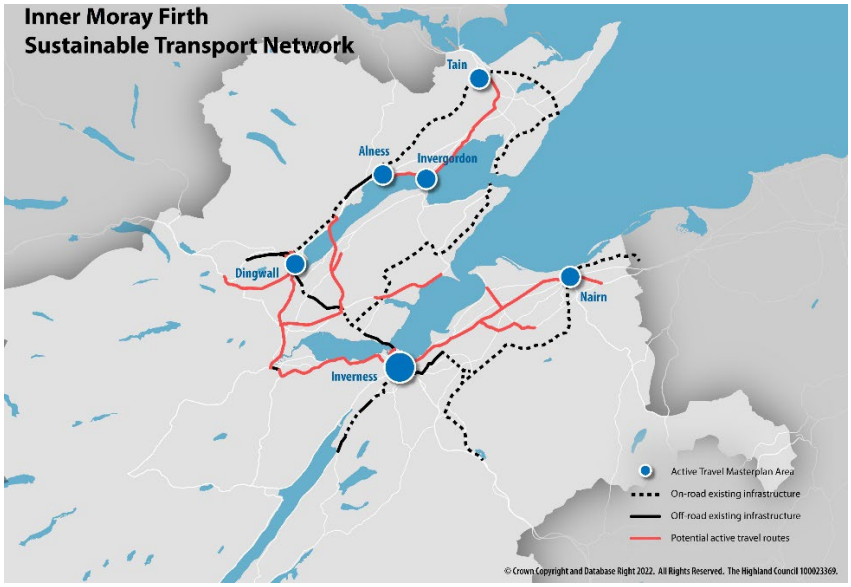

Figure 11: IMF2 Sustainable Transport Network

This information provides the starting point for future action to address the needs of walking, wheeling and cycling across the transport network and forms the basis of seeking developer contributions or direct improvements (in line with IMF2 Policy 14: Transport). It will also support the Council in developing more detailed transport strategy and provide the basis future funding bids to deliver active travel improvements across the Plan area.

IMF2 Policy 14: Transport (Figure 12) is the guiding policy for new development in the Plan area with regards to transport. It sets out the methodology for developers to follow to place more focus and detail on non-car modes:

1: *Transport Statement or Transport Appraisal*: By calculating the journey time ratio of car to different sustainable transport modes, and by appraising the frequency and journey time performance of sustainable transport modes, the overall potential of sustainable transport to serve a site can be derived. The outcome of this exercise provides the developer with a simple conclusion about the potential, and any shortcomings, of each sustainable transport mode, meaning mitigation can be meaningfully considered.

2: *Requirement for Travel Plans:* Policy 14 sets the requirement for developments of 10 or more homes, or 500 m^2 of commercial floorspace, to prepare and monitor Travel Plans. This approach places Travel Plans at the forefront of Development Management decisions and ensures that predicted impacts of a proposal on the transport network are appropriately mitigated, and where such measures are found to be ineffective through monitoring, alternative mitigation can be implemented. The policy provides a simple 5-point structure that will enable Development Management Officers to quickly determine whether a proposal has followed this part of the policy, providing opportunity for rapid feedback to applicants on aspects requiring further information.

3: *Developer contributions:* The final part of the policy explains that development proposals will be required to make financial contributions towards sustainable transport improvements. This complements part 1 of the policy, the journey time assessment, by providing mechanisms to improve sustainable transport options for a proposal. The detailed requirements for each Place will be kept up to date through the Plan's Delivery Programme.

Policy 14

Transport

To receive planning permission, development proposals must be able to demonstrate that walking, wheeling, cycling and public transport are at least as, or more competitive travel options for people using the development, than travelling by private car. The methodology that applicants must follow to demonstrate compliance with this policy requirement is set out in Appendix 2 - 'Journey time competitiveness methodology | Modh-obrach farpaiseachd ùine siubhail'.

Travel Plans must support any development proposal of 10 or more homes or more than 500m^2 retail, office, business or industrial development. This must demonstrate how the proposal will support a transition to sustainable transport. Any other development that the Council considers likely to have significant trip-generating impacts will also require to be supported by a Travel Plan. The Travel Plan must include the following information to comply with this policy:

1. Clear and measurable targets and objectives to deliver sustainable transport for that development.
2. The range of effective measures that will be implemented to mitigate the impacts of development that will deliver sustainable transport.
3. The monitoring and reporting framework that will be used to quantify the effectiveness of measures implemented, and when this will take place and be reported to the Council.
4. How the existing transport context has determined the measures considered most effective to deliver sustainable transport.
5. What mitigation will be implemented if such measures are found to be ineffective through monitoring, and how these measures will be monitored and reported to the Council.

Developer contributions will be secured to mitigate the impacts of development to support the transition to sustainable transport. These contributions are set out in the Council's Delivery Programme, and are referred to in the Developer Requirements for sites and in the Placemaking Priorities for settlements:

- Where an active travel or public transport priority scheme is identified in the Plan, financial contributions towards their delivery will be sought from development proposals within the settlement, or defined catchment, on a per home or floorspace equivalent basis.
- Where no specific intervention is required, a standard contribution per house or floorspace equivalent will be sought towards improving active travel and public transport infrastructure in the settlement or catchment area.

Figure 12: IMF2 Policy 14: Transport

Objective 3: public transport is the easiest way to make longer journeys and for those that can't use active modes

The public transport network comprises road-based bus and taxi services and the rail network, which provides services via the Highland Main Line, Aberdeen-Inverness Line, Far North Line and Kyle Line. Figure 13 illustrates these networks. Stagecoach operates bus services in the Plan area and has identified significant shortcomings on the transport network, particularly in Inverness where adverse impacts to the efficient operation of services is occurring. This is a major challenge for promoting sustainable transport, since it is a key driver in reducing patronage, as recognised in the National Transport Strategy (Figure 14).

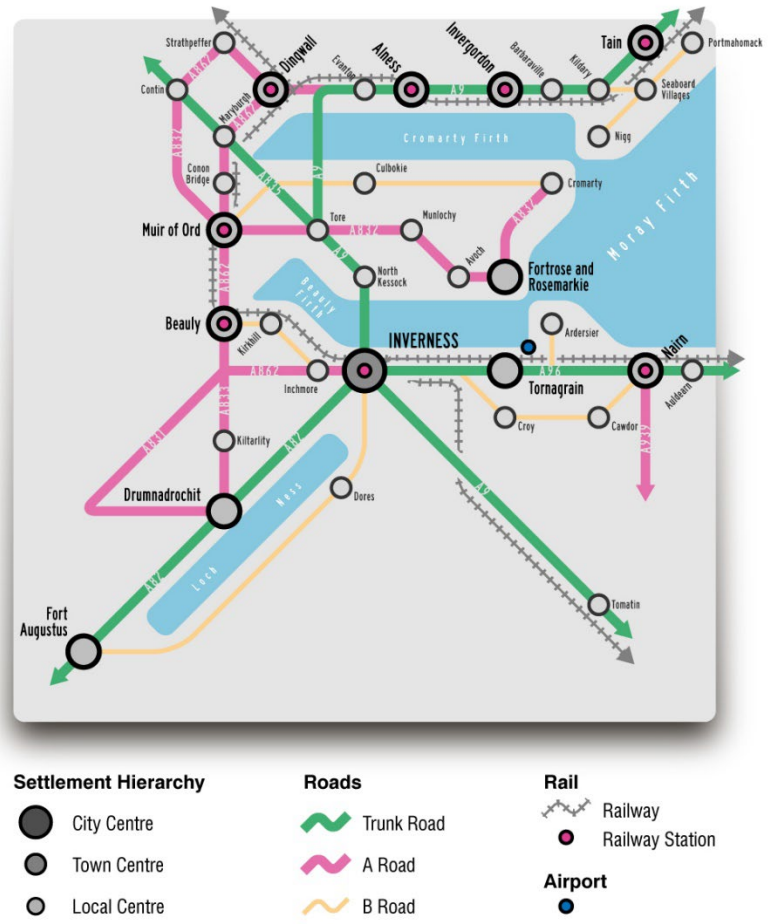

Figure 13: IMF2 Transport Network

Key to addressing these shortcomings is identifying how to maximise the efficiency of buses, especially in constrained locations. Recognition of these issues is made in IMF2. For example, in Policy 15(c) Inverness East Development Brief, the indicative masterplan is designed to ensure future bus services can be provided along a single direct primary street within easy walking distance of all new development (~400-600m) (Figure 15). For major new developments this is the approach favoured by the Plan, either being prepared by the Council, or sought through Developer Requirements for specific sites. Beyond making public transport a more competitive and efficient travel option compared with private car, carbon reduction through public transport can also be achieved through improvements to the network and fleet. The Scottish Green Bus Fund delivered the Inverness Electric Buses project that has decarbonised part of the bus fleet in the city, directly contributing to efforts to tackle city centre air quality problems.

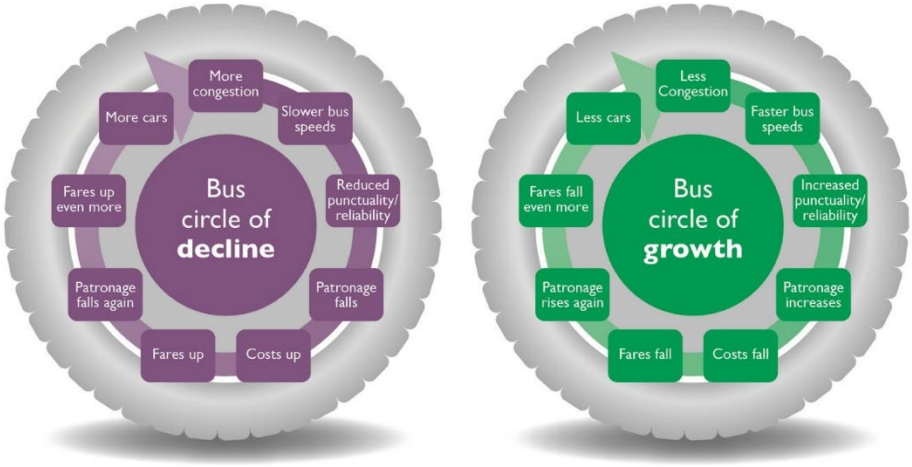

Figure 14: Bus Circles of Decline/Growth

The Council was successful in its bid to Scottish Government's Bus Partnership Fund. Work is currently underway exploring the potential for a range of measures to tackle the impacts of congestion on buses in Inverness. This work centres on several Strategic Transport Appraisal Guidance

Figure 15: Inverness East Development Brief Street hierarchy

workstreams for lane space reallocation for buses, junction improvements/bus prioritisation and park and ride opportunities. Tendering for the work is underway, and the STAG processes will be informed by IMF2.

The Council is currently establishing an Inverness Bus Service Improvement Partnership which will play a key role in the Bus Partnership Fund, as well as working with the Council to identify effective, novel ways to mitigate transport impacts of new development by supporting public transport. The work this group undertakes will inform what public transport interventions are identified in the IMF2 Delivery Programme. At present the Council considers there is opportunity for strategic park and ride facilities around Inverness, as highlighted in Figure 2 above and in Figure 16 below. These concepts will be further tested through the Bus Service Improvement Partnership; Bus Partnership Fund STAG processes; and through land allocated for park and ride facilities in Inverness (site INE16) and North Kessock (NK02).

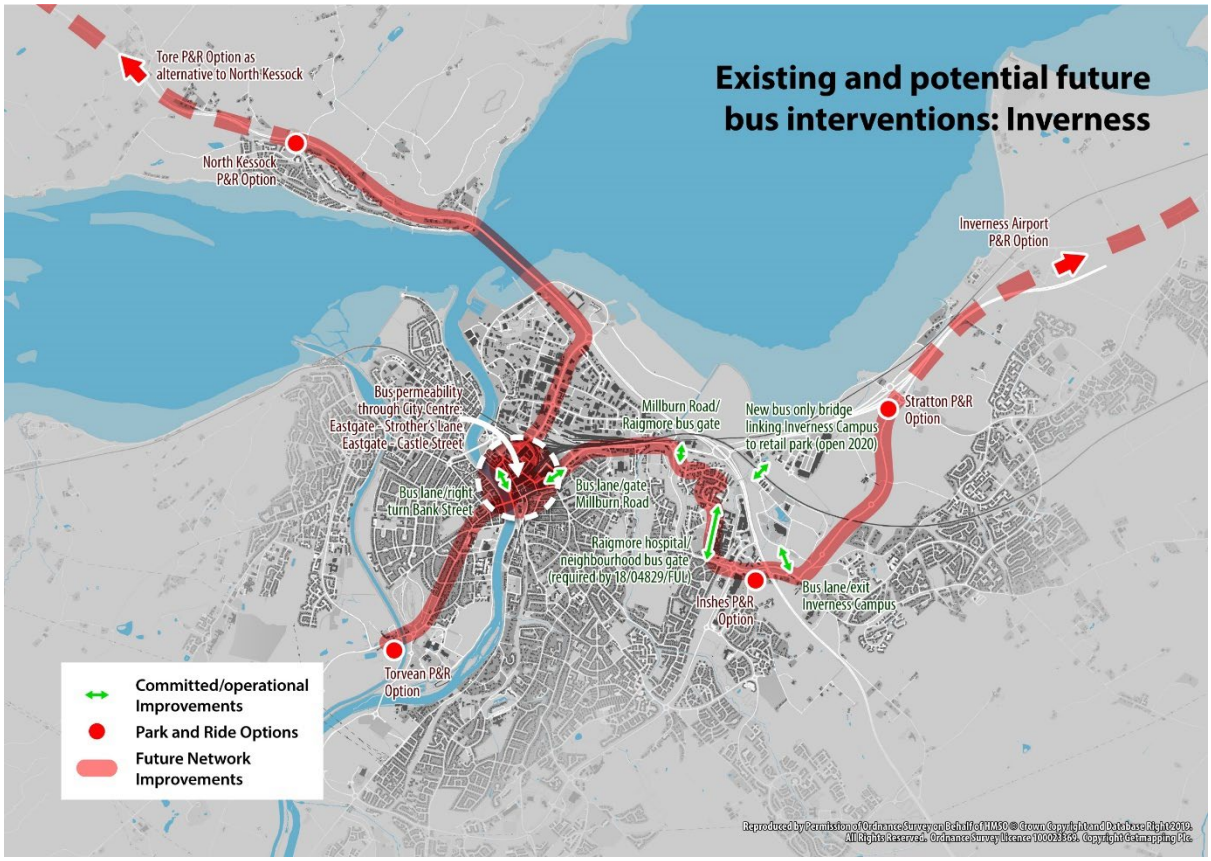

Figure 16: Potential bus interventions

The rail network is equally important for sustainable transport in the region but the network has less coverage of the Plan area, with some historic stations no longer open. Constraints to the network include single line, lack of passing loops, line speed restrictions, numbers of level crossing and no electrification also present issues for the rail network. Nevertheless, where rail stations do exist, they offer competitive and sustainable travel options and therefore good locations for the relative grow of communities. Investment in the network

has occurred in recent years, as explained below, however improvements like the electrification of the rail network could deliver significant gains in making it a more sustainable mode choice. THC will therefore continue to work with Network Rail on its Highland Mainline Perth to Inverness Decarbonistation proposals, and the Network Rail Station Masterplan project, Phase 2, for which Highland Council is leading the Urban Realm theme.

The Highland Main Line received improvements of £58.2 million between 2012 and 2019. These improvement works comprised increases to service frequencies, journey time reductions and new infrastructure. An hourly service between Inverness and Perth is expected, with average journey times expected to be reduced by 10 minutes, and freight operations made more efficient.

The Far North Line Review Group has worked to implement safety and journey time improvements, and continues to work on line improvements. A range of these improvements are directly beneficial to settlements in the Plan area, as summarised in Table 5.

Settlement	**Rail improvement**
Alness	All day hourly service to Inverness planned
Beauly	Peak half-hourly service to Inverness/Dingwall available, with additional service improvements planned
Conon Bridge	Peak half-hourly service to Inverness/Dingwall available, with additional service improvements planned
Dingwall	All day half-hourly service to Inverness planned
Evanton	Additional rail capacity would be required to open this rail halt with no current committed funding and significant housing development expansion to justify a scheme (IMF2 allocates 185 homes, with 66 expected to be delivered in the next 10 years)
Invergordon	Peak hourly service to Inverness planned (could offer potential for rail freight)
Inverness Airport (Dalcross for Tornagrain)	Peak half-hourly services for Inverness and Nairn planned
Inverness East Rail Halt	Recent feasibility study indicates that bus priority may be more effective for this area, with potential to service a Tain to Elgin rail connection
Muir of Ord	Peak half-hourly service to Inverness and Dingwall available, with additional service improvements planned
Nairn	Peak half-hourly service, off-peak hourly service to Inverness, Forres, Elgin
Tain	All day hourly service to Inverness planned
Tomatin	Currently no business case to support stopping existing services at this location (express Inter7city services)

Table 4: Rail improvements

By recognising the combined potential of bus and rail in the preparation of IMF2, including further work with partner organisations, Objective 3: public transport is the easiest way to make longer journeys and for those that can't use active modes can be achieved.

Objective 4: A transition to use of electric vehicles for other journeys is supported

Congestion remains a key challenge to supporting growth, particularly in some of the area's towns, and Inverness, where it is most pronounced. It is now widely accepted that building more roads for cars to tackle congestion does not work. This is because new space is rapidly occupied by more people choosing to drive, perceiving there to be more space which will make it the easiest way to travel. For a lot of the congested parts of the Inner Moray Firth area there simply is not enough room between buildings to add more road space, meaning the best option may be to design the available space more efficiently to address congestion and share road space. Creating a more varied transport network where walking, cycling and public transport are genuinely competitive with driving will reduce the amount of people having to drive and it will make more efficient, equitable use of the existing network, and therefore make more space for those that do need to travel by car.

Whilst new technologies like low-emissions and electric vehicles have potential to make strong contributions towards reducing the carbon emissions of driving (excluding the carbon-intensive manufacturing process) they will not solve the issue of congestion because the same amount of road space is required for these vehicles as is required for fossil fuel vehicles. Nevertheless, it is important to recognise their potential for tackling the area's rural challenges where the only viable mode of transport is often private car. Coupled with a range of active travel and public transport interventions in the more urban places, electric vehicles can contribute to tackling carbon emissions associated with transport. Therefore, infrastructure to support the transition to electric vehicles is required during the lifetime of the Plan. This position accords with the National Transport Strategy which recognises the important role that electric vehicles can play in achieving a low carbon transport system (Figure 13).

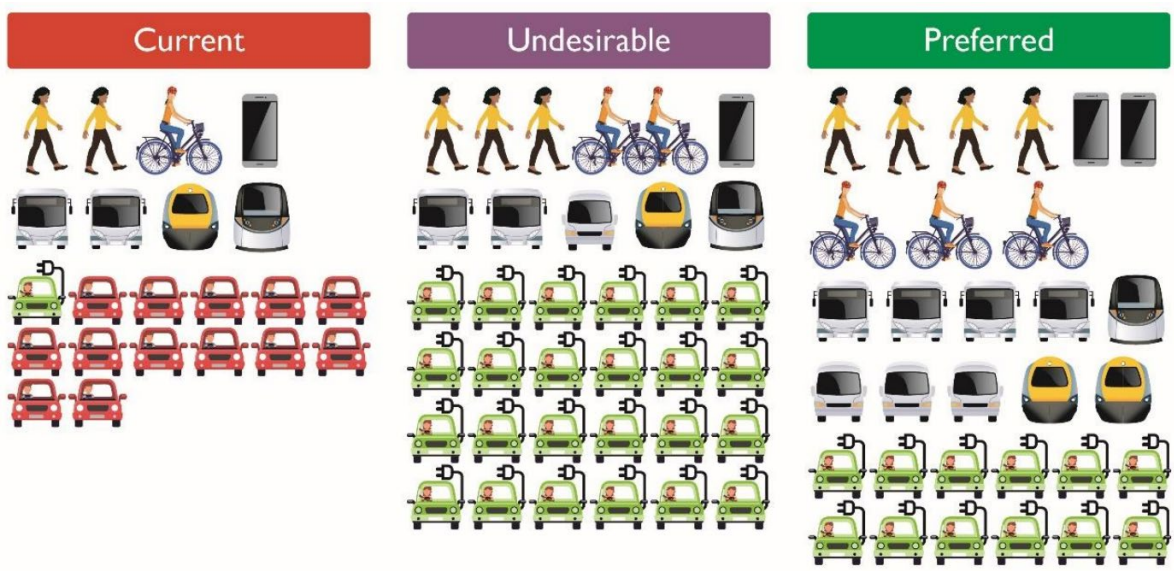

Figure 17: NTS2 mode share scenarios

The Scottish Government's Climate Change Plan sets strong milestones in its Vision, phasing out new petrol and diesel cars by 2030, with public sector fleets phasing out the need for any new petrol and diesel light commercial vehicles by 2025. Transport Scotland is also leading efforts to improve the trunk road network through the Electric A9 project. Most infrastructure needs for electric vehicle charging can be easily provided at home, where vehicles are parked in driveways and chargers can be installed. For people without off street parking, and where there will be additional need to charge in public places, further investment is required. Work is currently underway with the Council's Climate Change Team, the Energy Savings Trust and Transport Scotland to expand the publicly accessible network of electric vehicle charging infrastructure across the Plan through its Low Carbon Travel and Transport Programme which, alongside the other initiative explained will work together to achieve Objective 4: A transition to use of electric vehicles for other journeys is supported.

Objective 5: Committed and strategic road improvements are delivered

During the lifetime of IMF1, the Inverness and Highland City Region Deal was agreed between THC and the Scottish and UK Governments. Amongst the range of projects backed by a £315 million funding package were several major transport schemes. IMF2 sets out a spatial strategy consistent with IMF1, albeit with considerably reduced housing supply targets (Table 1). Therefore it is considered that IMF2 will present no additional impacts in the areas where these major transport schemes are being planned and delivered and, in fact, sets out a range of place and site-specific transport mitigation to address these aspects in IMF2.

The A9/A96 Inshes to Smithton Scheme and Longman Junction Improvement Scheme are two key projects being progressed by Transport Scotland that are supported by a £109 million budget. Transport Scotland published the draft orders for the A9/A96 Inshes to Smithton scheme (see A9/A96 Inshes to Smithton online) in September 2019. THC continues to work in partnership with Transport Scotland on this project and it is understood that work is at an advanced stage with the project awaiting a Ministerial Decision to proceed to the next stage. The draft orders include provision for active travel, including a two-way segregated cycle route connecting the Inverness Retail Park with future development at Inverness East, in accordance with the Inverness Active Travel Audit and Inverness East Development Brief. IMF2 is prepared in the knowledge of this scheme, which will help to support a sustainable expansion of the city in the east. The scheme will contribute to addressing congestion associated with the A9 and A96 trunk roads and therefore assist in addressing issues identified in the Transport appraisal for IMF1 associated with expansion of Inverness, east of the A9.

The A9/A82 Longman Junction Improvement Scheme (see A9/A82 Longman Junction Improvement Scheme online) scheme is currently working towards the Design Manual for Roads and Bridges (DMRB) Stage 3, having identified the preferred option at DMRB Stage 2 in June 2019. The preferred option is to construct a new A9 flyover above the A82 and Stadium Road connected using a three-lane signal-controlled roundabout with improvements for walking and cycling. The purpose of this scheme is to address congestion issues associated with the trunk road network and associated land uses in the city. THC is working in partnership with Transport Scotland to consider the scheme in the wider context of redevelopment of the Longman Landfill site and connectivity with the Longman Industrial Estate.

Inshes Junction is recognised as a challenge for congestion in the city. It is inherently linked to the A9/A96 Inshes to Smithton project. The two schemes connect at the western abutment of the proposed second Inshes overbridge and are located within an area of major trip-generating uses, including Raigmore Hospital, LifeScan Scotland and Inshes Retail Park. The City of Inverness Area Committee agreed at its November 2021 Meeting for Officers to proceed with statutory processes to deliver these improvements to align with the expected completion of the A9/A96 Inshes to Smithton scheme. THC is collaborating with NHS Highland, Stagecoach, Active Travel groups and other key stakeholders to ensure that this project will

tackle congestion in a way that creates a sustainable, multi-modal transport solution that enables the network to perform effectively.

The West Link Road is a Council-led Inverness and Highland City Region Deal being delivered in two stages, the second of which was recently completed. This project facilitates new crossings over the Caledonian Canal and River Ness, providing connections for people seeking to travel without entering the city centre, such as those travelling from the A82 at Torvean to the A9 heading south or A96 heading east. It is considered that the project has alleviated congestion in Inverness City Centre and therefore is contributing to the creation of a safer, healthier environment that will enable people to walk, cycle and use more effective public transport services in future, addressing issues identified in the Transport Appraisal for IMF1.

The A9 Dualling Perth to Inverness is a national project with a £3 billion budget due for completion by 2025. Two sections of this project are within the Plan area:

- Scottish Ministers decided to make the Orders for the 9.6km **Tomatin to Moy** section of the route on 11th February 2020. This scheme will change the existing route to dual carriageway including a new grade-separated junction at Tomatin, junction upgrades and a range of active travel provision.
- The **Dalraddy to Slochd** section of the route is currently being considered by a Reporter appointed by the Planning and Environmental Appeals Division of the Scottish Government on objections that have not been withdrawn. This scheme will change the existing route to dual carriageway including grade-separated junctions at Aviemore South, Granish and Black Mount, as well as a range of other necessary structures, lay-bys and provision for active travel. A small section of the northern end of this scheme is within the IMF area.

The A96 Dualling Inverness to Aberdeen is a national project with a £3 billion budget due for completion by 2030. One section of this project is within the Plan area:

- The 31km **Inverness to Nairn** section of the route had a Public Local Inquiry in October and November 2018 and a decision by Scottish Ministers to make the orders with modifications was made in February 2021. The proposed scheme includes grade-separated junctions at Smithton and Balloch, Inverness; Mid-Coul; Brackley; and Nairn West and East, as well as a bypass around the southside of Nairn and a range of other necessary structures, lay-bys, de-trunking of sections of the existing A96 and active travel provision.

A range of sites are allocated throughout settlements in Ross and Cromarty that rely on the trunk road network for transport connections. IMF1 identified the potential for a range of junction upgrades to be delivered to support new development. It is considered that there may continue to be a need for such improvements in the settlements of Alness, Evanton (and

highland Deephaven Economic Development Area), Invergordon and Tain. Table 6 shows the amount of development land allocated in IMF2, compared with IMF1:

Place	IMF1 land allocated	IMF2 land allocated
Alness	1,210 homes; 81.4ha commercial	400 homes; 84ha commercial
Evanton	330 homes, 149.2 ha commercial	185 homes; 6.6ha commercial
Invergordon	915 homes; 223ha commercial	570 homes; 70.6ha commercial
Tain	572 homes; 28.5ha Commercial	583 homes. 29.7ha commercial
Highland Deephaven	147.1ha commercial	150.2ha commercial

For any settlement or site with the potential to have impacts on the trunk road network, mitigation is set out in the Plan, and where appropriate this includes reference to the need for appraisal in line with Transport Scotland's Strategic Transport Appraisal Guidance.

The Plan recognises the committed and strategic road improvements in the area that will support growth of the wider region, therefore supporting Objective 5: committed and strategic road improvements are delivered.

Other notable investment and activity

A range of other actions are being delivered to improve the transport network, which are recognised as making significant contributions to delivering the IMF2 transport strategy. Ports and harbours provide connectivity with the UK and rest of the world for business and leisure, as well as facilitating the sustainable, efficient movement of goods and products. These modes, coupled with road, ensure a range of transport options that will contribute to ensuring resilience to disruption, such as climate and ecological emergency.

Inverness Airport

Inverness Airport continues to provide national and global connectivity and access to markets for the Highlands and Islands region, recognised in Transport Scotland's Initial appraisal: Case for Change- Highlands and Islands- STPR2 report. Work is ongoing with THC, Highlands and Islands Airports Limited (HIAL) and HITRANS on the delivery of electric vehicle charging points at the airport. The EU Smart Peripheral and Remote Airports project is also underway, developing a low carbon transport strategy for the airport. Construction of the Dalcross Rail Station is currently underway, with a direct active travel link to the airport in place, and consent granted to link the rail halt to the adjacent Tornagrain new town, better connecting this international port to key destinations via rail, bus and active travel networks.

Inverness and Cromarty Ports

Inverness and Cromarty Ports support the movement of goods, products and people in and out of the region, with Cromarty in the top eleven ports in Scotland serving these functions

and enabling significant cruise ship passenger numbers to visit the Highlands. Proposals for improvements/ expansions from both ports have been supported through IMF2.

Rail Freight

Rail freight contributes to removing heavy goods vehicles from the road and creating efficiencies in the distribution network. There is currently a Stobart/Tesco freight service in operation and there may be further potential for improving and increasing the volume of goods and products transported by rail within and outwith the IMF area, and potential for further integration in Inverness. Network Rail will be exploring this as a specific theme as part of the Inverness Station Masterplan Phase 2 work.

Appendix 1: Transport Scotland response to Draft IMF2 MIR DPMTAG

Note: a separate appendix of trip-generation and distributions supports this appraisal and responds to some of the comments within this Appendix.

TRANSPORT SCOTLAND RESPONSE:

"Inner Moray Firth Local Development Plan 2 – Main Issues Report

Thank you for the opportunity to comment on the Inner Moray Firth 2 Main Issues Report (IMF2 MIR). We thoroughly welcome the engagement to date and look forward to continuing this collaborative approach as the plan progresses. We trust you will find the comments from Transport Scotland helpful and we would welcome further discussion on them if needed.

It is welcomed that the MIR recognises the Climate Emergency with the Highland Council working towards a carbon neutral future by 2025. This is aligned to the prioritisation of sustainable travel detailed in paragraph 1.2.6 '*Creating a more healthy, sustainable transport network'*, which promotes the National Transport Strategy 2 Sustainable Travel Hierarchy. Transport Scotland supports the vision The Highland Council is proposing, to utilise the travel patterns seen during the pandemic and use this as a 'stepping stone' to change attitudes supported by a new transport strategy; and welcomes the shift in focus towards sustainable travel.

Under the preferred approach for "Matching Development with Infrastructure Capacity" the MIR states at p38:

"We think that the following measures will help to ensure that development and infrastructure capacity are better aligned," with a number of bullet points detailed on how best to align these issues, including:

- Maintain the aim of directing growth to areas that have existing spare infrastructure capacity.
- Set out the headline infrastructure requirements for settlement and site allocations through Placemaking Priorities and Developer Requirements.
- Promote the Delivery Programme as the principal tool for monitoring and implementing the infrastructure needed to support the delivery of the proposals and sites shown in the Plan.

- Make sure that development proposals clearly demonstrate that mitigation measures are in place to deal with all infrastructure implications, including surface water drainage and transport requirements.

Such an approach is welcome to ensure locational policies accord with required/available infrastructure.

At 1.2.6 “Creating a more healthy, sustainable transport network” the Main Issues report proposes an ambitious new strategy for transport in the Inner Moray Firth area. It seeks to transform transport to tackle the climate and ecological emergency by ensuring road space is shared equally between the different transport modes that need it and that sustainable transport options are prioritised, but do not unfairly disadvantage those that do need to travel by car. Again, this is a welcome and commendable approach.

The following evidence base presented within the MIR concludes that to achieve such an approach an ambitious new transport strategy is required.

The resulting ‘Sustainable Transport Policy’ detailed on p46 is welcomed but would benefit from including reference to the NTS2 sustainable travel hierarchy and potentially the Climate Change Plan commitment to reduce car kilometres travelled by 20% by 2030.

Also, under point 2a of the preferred approach it states that Travel Plans will be required to support the transition to sustainable transport. However, at point 3 it states “Developer contributions should be secured….Sites allocated in the Plan should ensure future development enables travel behaviour using most sustainable transport possible and we think that developers should therefore contribute…..”

Whilst appreciating that, at the moment, this is identified as the preferred approach within the MIR, in order to achieve and deliver an ambitious new transport strategy, stronger language is required with regard to how this will be achieved and delivered through development management/planning applications, it is suggested that “will” rather than “should” is used.

Travel Plans have an important role to play, however, their successful delivery and continued implementation is critical if they are to achieve the desired aims and truly support the transition to sustainable transport. They, therefore, require to be monitored and enforced to be fully effective. This can prove challenging for authorities with limited resources and budgets. This vital role that Travel Plans will require to fulfil requires to be clearly stated, therefore, the Council should include information relating to monitoring and enforcement in the plan. Additionally, the Council should clearly set out specific criteria required for Travel Plans which will be used to monitor and assess their effectiveness and the enforcement procedures and consequences of non-compliance.

It is recommended for any map which will be included within the new LDP depicting transport or associated with the new transport policy, that it accords with the NTS2 sustainable travel hierarchy, recognising walking, wheeling and cycling first, then public and shared transport. While electric vehicles play a part, they are private cars and should not be encouraged at the expense of alternative, more sustainable, modes.

It is encouraging that the MIR states that the Plan will identify the range of measures and requirements for transport to deliver a new, ambitious transport strategy. It is imperative that the Plan provides specific details of such required measures, including the proposed funding mechanism, who will be responsible for the delivery of these measures and when these will be delivered. Such details should be linked to the delivery of specific land use allocations and not left solely to the Delivery Programme. Such an approach will make it clear what is required of applicants from the outset of the planning application process.

In relation to the potential sites for inclusion in the plan, it is understood there will not be a significant increase in housing, although this is still to be finalised through the 2020 Housing Needs and Demand Assessment to be published shortly. It is noted, that housing supply targets are likely to be lower than the previous plan, however no figures are given.

Based on the site information provided within the MIR and information within the associated draft Transport Appraisal, Transport Scotland is satisfied there would not be a significant cumulative impact to the trunk road network as a result of the preferred spatial strategy options and the shift towards a more sustainable travel modes. However, there are a number of locations where Transport Scotland would require further detail on the potential impact of specific development which are outlined in more detail within the included Annex 1.

For relevant locations identified in Annex 1; an assessment comprising outlining potential trip rates and any build out/phasing information of the sites should be undertaken. This would then inform any potential need for an assessment of the impact on the trunk road network utilising appropriate transport modelling tools. We understand there are significant infrastructure improvements planned for the Inverness area. We are, however seeking to determine any potential impact prior to the completion of such schemes and what, if any, interim measures may require to be delivered to support such developments prior to completion of the wider, more strategic interventions. We would also seek to understand that if required, who will be responsible for the funding and delivery of such a scheme and the required timescales for delivery.

The draft Transport Appraisal accompanying the MIR is very thorough and includes references to the NTS2 and that the Council is promoting a genuine shift to more sustainable modes of travel. The work undertaken to date is welcomed, which takes cognisance of discussions with Transport Scotland. The four Objectives outlined are important and relevant and follow the NTS2 hierarchies. A point to note is the Transport Appraisal would have benefitted from site specific transport information to fully determine the sustainable transport measures the Council is proposing at site level given the TA states "*the spatial strategy…has been strongly influenced by considering sustainable travel* " and that "*the MIR has taken sustainable transport into account in every site decision*." It is recommended further information is included on this within the Transport Appraisal that will accompany the publication of the Proposed Plan.

It is welcomed that the transport appraisal includes information detailing the preferred sites have been analysed in terms of several transport-based criteria which has led to a hierarchy of settlements, outlining where development is preferred and can be accommodated. This has resulted in several settlements, including Munlochy and Tore deemed least sustainable for development based on numerous criteria, including transport concerns.

The Case for Change Report for the A9 North Kessock – Tore Study has been published and is progressing to the Preliminary Appraisal Stage. This is an important Study which recognises the need for a holistic solution at various locations on the A9 as a result of safety and capacity issues which are arising due to small scale, incremental development being permitted in the Black Isle area some of which was in locations not allocated in the current LDP. It is imperative potential outcomes of the

Study be included within the Proposed Plan and the Council recognise the potential impact of all development including the small scale developments will have on the junctions. In this instance, given the on-going appraisal work we are undertaking in the area, Transport Scotland will also be undertaking an additional exercise to consider what, if any further levels of development may be acceptable in this area with the continuation of small scale developments being consented which are not allocated in the plan. Transport Scotland will require full backing from the Council to progress the additional assessment and your support to deliver the outcome of the assessment, which may result in additional mitigation works on the trunk road network as a result of development, which will require funding from developers.

Similarly a Case for Change Report for the junctions on the A9 at Tain is being undertaken. A new 50mph speed limit has been implemented on the A9 around Tain as a measure to support a reduction in the number and severity of accidents at the junctions with the A9. This will be monitored while the Case for Change for this area is concluded.

Site specific comments are provided in Annex 1 below:

In general for all sites adjacent to the trunk road network, the access strategy may require further consideration and discussion with Transport Scotland. Access is recommended to be taken from the local road network and any intensification of an existing trunk road junction to serve additional development may require an upgrade to comply with the Design Manual Roads and Bridges, the design standards for trunk roads. Any modification to existing trunk road infrastructure will require agreement with Transport Scotland prior to any planning application submissions.

Annex 1 provides comments on the sites identified in the MIR that have the potential to affect the continued safe and efficient operation of the trunk road network. This includes both sites that have a direct impact on the network, as well as those which take direct access from the local road network, but their scale or proximity may have an adverse impact on the strategic transport network. Transport Scotland would welcome further discussion on the impacts of the proposed housing, industrial and commercial developments as you progress work from the MIR to the PP stage.

Policy Approach

Transport Scotland supports a policy, as laid out in Scottish Planning Policy, of allocating land use development in sustainable locations where these developments can best be served by the existing infrastructure, promoting modal choice and a reduction in the need to travel.

The Main Issues Report should enable Transport Scotland to come to an understanding as to how the main aspects of the preferred and alternative spatial strategies are likely to impact on the strategic transport network.

An important issue for Transport Scotland is the potential for new developments and the cumulative effects of these developments to affect the continued safe and efficient operation of the trunk road. There are a number of sites in the Main Issues Report which will have a direct impact on the trunk road network.

Transport Scotland expects that existing trunk road junctions will be used in preference to new junctions to reduce the impact on the trunk road network. Where developments propose a new junction to the trunk road, the development will be looked at in relation to surrounding proposals, and an access strategy for the corridor will be examined so that developments are viewed in the wider context rather than on a piecemeal site by site basis.

For some settlements below, and where specifically mentioned, based on the preferred and alternative sites in the MIR the trip generation associated with development, including any build out/phasing information is required to be identified. This may then inform any potential need for further assessment of the trunk road impact to be undertaken to inform the Proposed Plan, using traffic modelling tools where appropriate once discussed with Transport Scotland. This information is required to inform the Proposed Plan spatial strategy and any potential measures required to be delivered to facilitate development.

Transport Scotland would welcome further engagement on the above as work is initiated and progressed. We would not want the Council to undertake a substantial amount of work when this may not be required. However Transport Scotland requires to understand any potential localised impact to the trunk road network and ensure the LDP is prepared taking cognisance of the outputs of this work.

Alness

An appropriate access strategy for the various development opportunities should be discussed and agreed with Transport Scotland. It would be expected that existing junctions will be used to access the proposed sites, however, intensification of existing farm accesses with the A9(T) would not be an acceptable strategy for this high-speed section of the trunk road. The trip generation associated with the various development opportunities, including any build out/phasing information is required to be identified and discussed with Transport Scotland this will enable us to take a view whether further assessment is needed.

The comments would still stand although we note for site AL19 – Alternative – a new access is proposed on to the A9. This would need to be discussed and subsequently approved by Transport Scotland as detailed above.

Conon Bridge

In relation to the preferred sites of CB01 and CB02 at Conon Bridge, it is considered the potential transport impact of both sites should be considered together at application stage and include the impact of development that has been consented but has not already been built out. This can be addressed at planning application stage.

Comments remain the same

Munlochy/Fortrose/Black Isle

Of the LDP2 MIR preferred sites at Munlochy and Fortrose we are not clear which have planning permission, although we understand that some do. Notwithstanding this all these sites have the potential to impact on the trunk road; in particular the A9 Tore roundabout and the A9/B9161, Munlochy Junction. The Highland Council and Transport Scotland previously highlighted operational concerns relating to intensification of use from development at the Munlochy junction.

The continuation of small scale developments coming forward continues to exacerbate the existing issues at various junctions along the A9. The Case for Change and ongoing Preliminary Appraisal of the A9 between North Kessock and Tore, based on the principles of STAG, is progressing and the Proposed Plan requires to take cognisance of any outputs and further discussions with Transport Scotland on

potential development levels that may be acceptable. Dependent upon the outcome of this work, the current contribution mechanism applied to proposed development within the Black Isle to mitigate its impact on the trunk road network is likely to require to be revisited. While we welcome that the Council is not proposing any specific additional sites, in the absence of anything in the plan we have no reason to believe that unallocated sites (such as single dwelling/small scale developments), consistent with the development plan, will not continue to come forward as has been the case to date. This unconstrained development in this area is unacceptable and cannot continue without appropriate mitigation and this should be reflected within the Proposed Plan strategy. We would also highlight the need for full backing of the Council for any mitigation required at this junction.

With that in mind and given the continued development of the nature outlined above the Proposed Plan should make reference to the current contribution mechanism which may, subject to discussions with yourselves, need to be amended to apply to all development, including single dwelling proposals.

No change to comments on Munlochy.

Tain

Transport Scotland have highlighted to The Highland Council operational concerns relating to the trunk road junctions that serve Tain. It is appreciated that only one site new (TN02), with the other 3 preferred sites already allocated in the plan. We also understand that the Council's view is that not all 4 sites will come forward. However the trip generation associated with unconsented development, including any build out/phasing information should be undertaken. This would then inform any potential need for further assessment of the trunk road impact to be undertaken, using traffic modelling tools where appropriate. As you are aware a Case for Change appraisal of the A9, based on the principles of STAG, is being undertaken which includes junctions around Tain, however the above exercise should be undertaken to enable us to take a view.

With regard to the on-going A9 study, the outcomes of this proportionate appraisal should be used to inform the proposed plan. Any modification to the existing trunk road infrastructure will require agreement with Transport Scotland prior to inclusion within any supporting planning submissions.

We note the proximity of the preferred sites in Tain to the town centre which can be accessed via active travel. However, given the ongoing issues on the A9 surrounding Tain, the above comments remain.

Evanton

Should the alternative sites come forward, an appropriate access strategy will require to be developed in discussion with Transport Scotland. Additionally, for any alternative sites being considered for allocation the cumulative trip generation of the alternative sites and all sites allocated in the LDP and not consented, including any build out/phasing information is required to be identified and discussed with Transport Scotland. From this a view could be taken as to whether further assessment of impact may be required, should these alternative sites come forward. It would be expected that existing junctions will be used to access the proposed sites, however, the intensification of existing farm accesses with the A9 would not be an acceptable strategy for Site EV08 Industry and Business on this section of the trunk road.

No change to comments

Drumnadrochit

A number of the sites are located adjacent to the A82. It would be expected that existing junctions will be used to access the proposed sites, however, intensification of existing farm accesses with the A82(T) would not be an acceptable strategy for this section of the trunk road. Appropriate pedestrian and cycle facilities alongside and across the A82 would require to be identified and agreed with Transport Scotland.

We welcome the improvements proposed to active travel connections. The comments on access arrangements are still applicable. We note access to site DR03 is to be from a new junction with the A82. This will require discussion and approval from Transport Scotland.

Fort Augustus

Should the alternative sites come forward in addition to the preferred sites, an appropriate access strategy should be discussed and agreed with Transport Scotland. For any alternative sites being considered for allocation the cumulative trip generation of the alternative sites and all sites allocated in the LDP and not consented, including

any build out/phasing information is required to be identified and discussed with Transport Scotland. From this a view could be taken as to whether further assessment of impact may be required, should these alternative sites come forward. It would be expected that existing junctions will be used to access the preferred sites.

It is noted that alternative site FA03 is detailed as requiring a new access with the A82(T). This will require to be discussed and agreed with Transport Scotland. The comments relating to access and impact remain applicable.

Invergordon

The preferred sites at Invergordon have the potential to impact on the trunk road; in particular the A9(T) Tomich junction. In order for Transport Scotland to provide an informed response on the impact to the A9(T), the cumulative trip generation of all preferred sites and allocated sites in the LDP but not consented, including any build out/phasing information is required to be identified and discussed with Transport Scotland. From this a view could be taken as to whether further assessment of impact may be required.

The Highland Council previously highlighted operational concerns relating to the unconventional left/ right stagger at the ghost island right turn priority Tomich junction and commissioned the design of junction upgrades. The Plan should consider this previous work and identify what measures may be required to address potential constraints, due to further development impacting on the trunk road network.

The above comments are still applicable. It is noted that only for the non-preferred site of IG11 that improvements to Tomich junction may be needed. However, all sites may need to contribute if there is a potential cumulative impact. We would welcome further dialogue on the Tomich area subsequent to the meeting with Transport Scotland and the plans to progress improvements to the A9 junction and the Opportunity Cromarty Firth proposals.

Tornagrain

The MIR states that while the whole of the preferred Site TG01 Tornagrain will be allocated in LDP2, the Proposed Plan will indicate which parts of the site will be delivered within the plan period. The MIR identified the Scottish Government's timescale is a commitment to dual the A96 by 2030. The A96 dualling programme

includes the delivery of a new section of trunk road and formation of the grade separated Mid-Coul Junction. Any potential constraint to development should be identified in the Proposed Plan.

No change to comments.

Nairn

The MIR states that there is support and pressure for the A96(T) dualling programme which includes the Auldearn/Nairn to Inverness section as the first stage to progress and that the delivery of a bypass of the town and the related de-trunking of the existing A96(T) through the town centre will ease long standing congestion problems and support aspirations for related public realm improvements. The MIR states that the Scottish Government's timescale is a commitment to dual the A96(T) by 2030. Detrunking of the existing A96(T) through Nairn is subject to agreement with Transport Scotland and any timescales for detrunking would follow the completion of the A96(T) dualling. This potential constraint to development should be identified in the Proposed Plan.

No change to comments

Central Inverness

The preferred sites IN68, IN71, IN72, IN73, IN74, IN75 and IN76 at Central Inverness have the potential to impact on the trunk road; in particular the A9(T)/ A82(T) Longman roundabout.

The alternative sites IN77 Mixed Use and IN78 Retail at Central Inverness also have the potential to impact on the trunk road; in particular the A9(T)/ A96(T) Raigmore Interchange.

In order for Transport Scotland to provide an informed response, the trip generation of these sites and allocated sites in the LDP but not consented, including any build out/phasing information is required to be identified and discussed with Transport Scotland. This may then inform any potential need for further assessment of the trunk road impact to be undertaken to inform the Proposed Plan, using traffic modelling tools where appropriate once discussed with Transport Scotland.

Development sites that lie adjacent to the A9, are distant from available sustainable transport options. The Plan will require to identify appropriate pedestrian and cycle facilities linking these sites to the town centre.

It is noted for sites IN73 – IN77 that improvements to the A9/A82 junction are being delivered through City Deal by 2027. However we would require to understand if there would be any potential cumulative impact of the above sites prior to the delivery of this scheme and what, if any level, of detriment there may be to the network. This would enable Transport Scotland to fully understand the impact and determine the most appropriate way forward in dealing with planning applications that may come forward.

East Inverness

The preferred sites IN80 and IN48 at East Inverness have the potential to impact on the trunk road; in particular the A9/ Culloden Road southbound slip roads. In order for Transport Scotland to provide an informed response, the cumulative trip generation of the preferred sites and any allocated sites in the LDP which are not consented, including any build out/phasing information, is required to be identified and discussed with Transport Scotland.

The preferred sites IN81 to IN104 at East Inverness benefit from an extant planning permission and/ or development allocation in the approved development plan, however, the sites have the potential to impact on the trunk road; in particular the A9/ A96 Raigmore Interchange if progressed in advance of the A9/A96 Inshes to Smithton link road and/ or the A96 Inverness to Aberdeen dualling scheme. This potential constraint to development should be identified in the Proposed Plan.

The above comments are still applicable. We would require to understand if there would be any potential cumulative impact of the above sites on the trunk road, specifically, on the A9/ Culloden Road southbound slip roads.

South Inverness

The alternative sites IN57 Community and IN59 Mixed Use at South Inverness have the potential to impact on the trunk road; in particular the A9(T)/ B9177 compact grade-separated junction. Should the alternative sites come forward for allocation, in order for Transport Scotland to provide an informed response, the cumulative trip generation of these alternative sites, any preferred sites in the area, and existing allocated sites

in the LDP which are not consented, including any build out/phasing information is required to be identified and discussed with Transport Scotland.

We note the comments on the alternative IN59 Milton of Leys site that it would not promote alternative modes of travel given the distance from the city centre, lack of sufficient routes and the challenging topography. We also note the potential for site IN57 to be used for community uses which would reduce the number of car based trips. We would welcome community uses on this site, therefore the site would not need to demonstrate cumulative impact alongside site IN59.

North Kessock

We welcome measures that enable people to travel more sustainably and are in line with the NTS2 sustainable travel and investment hierarchies. We are particularly keen to ensure that any park and ride sites are themselves accessible by public transport but also do not inadvertently abstract from longer public transport journeys. The implications of additional traffic on the existing compact grade separated junction with the A9 will require to be considered and any required mitigation measures agreed with Transport Scotland.

Preferred site NK03, A9 Northbound Car Park would not be supported by Transport Scotland if the existing access is intensified without an upgrade to the existing trunk road junction.

No change to comments

Whiteness

Transport Scotland would not support this location for housing development given its location a significant distance from existing settlements, services, facilities and public transport networks. It would promote the use of the private car for all journeys which is contrary to the NTS2 sustainable travel hierarchies and would require the provision of significant new active travel and public transport and road infrastructure which is contrary to the NTS2 sustainable investment hierarchy.

No change to comments

We trust you will find these comments helpful as the plan progresses. We would welcome continued involvement and further discussion on the cumulative assessments required for the relevant locations. We would not wish the Council to undertake significant transport modelling work when this would not be appropriate, The approach the Council is taking is commendable and we welcome the significant amount of work undertaken to date on the promotion of sustainable travel."

Appendix 2: THC Supporting information in response to TS MIR Comments

Settlement	Site (note MIR references are used for ease of cross-referencing)	TS Comment Summary	THC Response
Alness	AL19	Proposed new junction onto A9 would require to be approved by TS.	This site is not included in the Proposed Plan.
Munlochy/ Fortrose/ Black Isle	Housing in the countryside	Concerns over impacts of incremental housing development on A9 North Kessock to Tore Junctions	The Proposed Plan does not support housing in the countryside on the Black Isle, and instead focuses development to the existing settlements through its approach to Rural Housing - Hinterland Area. However, North Kessock site NK01 and Cromarty site CM03 do have a developer requirement for a contribution towards the TS study outcomes, whilst the rest of the sites on the south side of the Black Isle either already have planning permission or are carried forward from the last Plan. The Council would not support seeking contributions from single houses as it would be difficult to argue a single house represented a tipping point for exceeding network capacity and would therefore be unworkable in terms of trying to defend a refusal of planning permission on this basis.
Tain	Settlement-wide	Acknowledge Case for Change appraisal	Acknowledged in the settlement text.
Evanton	Settlement-wide (EV08)	Multiple MIR alternative sites with potential to impact trunk road junctions/ no trunk road farm access upgrades for new sites	Total land allocated in Evanton has decreased from 330 homes in IMF1 and 149.2ha of commercial land to 185 homes and 6.6ha commercial land in the Proposed Plan. A Developer Requirement is included to require site access to be taken from Airfield Road for site EV08.
Drumnadrochit	DR03	Existing junctions should be used to serve sites; DR03 new Trunk Road junction; Active Travel implications for	Proposed Plan sites DR03 has planning permission and DR05 is for a sports facility improvement, neither require new trunk road access; MIR Site DR03 (Proposed Plan site DR04) includes a Developer Requirement for a "Transport Statement and mitigation including new/improved

		trunk road network.	trunk road junction to satisfaction of Transport".
Fort Augustus	FA03	Site access to trunk road	Site not included in Proposed Plan
Invergordon	Settlement-wide	Development implications for existing road safety issues at Tomich junction	Text is included in the Proposed Plan to enable the Council to seek Developer Contributions towards a future Transport Scotland project once a design, cost and scheme is progressed: "Transport Scotland is currently investigating options to address existing road safety issues at Tomich Junction, future development found to place additional impact on this Trunk Road asset may be required to make financial contribution towards any improvements made."
Tornagrain	Settlement-wide	Concerns over development phasing impacting on trunk road assets prior to the dualling of the A96	A placemaking priority for the settlement sets phasing of development relative to trunk road infrastructure upgrading: "Upgrade the A96 roundabout prior to Phase 2 of development and Transport Scotland to deliver the A96 dualling between Inverness and Tornagrain prior to Phase 3 (unless demonstrated that additional phases can be suitably accommodated)."
Nairn	Settlement-wide	Potential constraint of A96 de-trunking to development should be identified.	The text addressing Nairn responds to this issue: "…The delivery of a bypass of the town and the related de-trunking will improve health and safety and allow for major regeneration to occur ... The Council will therefore continue to work constructively with developers and Transport Scotland to support the earliest delivery of this infrastructure, as well as managing development pressures in relation to the capacity of the local and trunk road networks." For the Sandown site in particular, detailed Development Brief guidance for this site, which has been carried forward from the adopted Plan, will also be carried forward.
North Kessock	NK03	No intensification of use of trunk road junction	Developer Requirement sets out that site is: "Safeguarded only for continuation of existing use and/or campervan service area" And therefore it is not considered that this allocation will result in an intensification of use of the junction.
Whiteness	EDA	TS do not support for housing due to	Site has planning permission and is supported in the Proposed Plan for Industry only.

		car-dependent nature of location	
Central Inverness	MIR: IN68, IN71, IN72, IN72, IN74, IN75, IN76, IN77, IN78	Sites have potential to impact trunk road, Sites IN73-77 may cause impacts to the network prior to City Deal improvements being delivered	MIR Sites IN77 & IN78 are not included in the Proposed Plan. Text addressing Central Inverness responds to the City Deal project and potential for impacts from the sites highlighted to both the local and trunk road networks: "[Development] will raise infrastructure capacity issues, albeit projects including the A9/A82 Longman Junction Improvement Scheme will support this development, and the Council will therefore continue work constructively with developers and Transport Scotland to manage development pressures in relation to the capacity of the local and trunk road networks, and the planning and phasing of upgrades to it." MIR Sites IN68 and IN71 are also informed by the Inverness City Centre Development Brief, which has been carried forward and sets detailed requirements for this area, including the following relevant text: "Transport Scotland must be consulted about access arrangements from the A82 (Longman Road). Proposals for additional accesses and new junctions off the A82 are unlikely to be supported." Furthermore, a detailed development brief is identified in the Developer Requirements for MIR sites IN73 and IN74.
East Inverness	MIR: IN80; IN84	Sites have potential to impact A9/Culloden Road Southbound slip roads; Sites IN81-IN104 may cause impacts to the network prior to City Deal improvements being delivered	Text addressing East Inverness responds to the City Deal project and potential for impacts: "Major Inverness and Highland City-Region Deal funds are committed in the area through the East Link road project that, alongside future dualling of the A96, will help unlock the opportunity to realise the long-established spatial strategy to expand the city at Stratton and Ashton Farms, which has an up-to-date Development Brief in this Plan ... Sites throughout Inverness East have the potential to impact on the existing trunk road network if progressed in advance of East Link and/or the A96 Inverness to Aberdeen dualling scheme. The Council will therefore continue work constructively

			with developers and Transport Scotland to manage development pressures in relation to the capacity of the local and trunk road networks." MIR Sites IN81; IN82: IN83; IN89; IN90; IN91; IN92 and IN93 have planning permission (ref: 16/02161/S42), with development restricted to 550 homes, after which upgrades to the Trunk Road are required, secured by planning condition. The additional sites without planning permission identified have been included in the trip-rate data in a separate attachment. The Inverness East Development Brief sets detailed phasing requirements, including for road infrastructure improvements, and this document is carried forward into the Proposed Plan as Policy 15(c).
South Inverness	MIR: IN57; IN59	Potential for cumulative impacts alongside other sites in Milton of Leys area	Sites not included in Proposed Plan