

Issue 9		A96 Corridor - Phasing and Infrastructure	
Development plan reference:		Policy 9 (Para 10.7, Page 35)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number)			
Irene Brandt (18), Joan Noble (67), Paul Jenkins (74), Alastair Noble (76), Nairn Suburban Community Council (94), Nairn West Community Council (101), Scottish Natural Heritage (118), Mrs E Holland (153), Highlands and Islands Green Party (HIGP) (168), Mrs Annie Stewart (172), Valerie Springett (179), Scottish Council for Development and Industry (SCDI) (180), Turnberry Consulting IABP (191), CB Richard Ellis for Grosvenor Eastgate Unit Trust (193), D and J Piggott (208), Nairn Residents Concern Group (NRCG) (209), Croy Community Council (218) Floris Greenlaw (222), Turnberry Consulting Ltd for Highlands and Islands Enterprise (HIE) (240), Turley Associates for Sainsbury's Supermarket's Ltd (267), C Stafford (272), Scottish Wildlife Trust (285), Scottish Property Federation (291), Homes for Scotland (293), Bowlts for Hector Munro (307), EMAC for Barratt, Robertson and Scotia Homes (333), Lance Hill (343), Moray Council (403), Ardersier and Petty Community Council (431), Cromarty and District Community Council (443), Scottish Association for Public Transport (446), M Gilvray (453), GH Johnston Ltd for the Trustees of Cawdor Discretionary Trust (465), Helen Jenkins (527),			
Provision of the development plan to which the issue relates:		A96 Corridor - Phasing and Infrastructure	
Councils summary of the representation(s):			
Principle of Development <ul style="list-style-type: none">▪ Oppose the development of Inverness and the A96 corridor. Question the role of this area as "an engine for the wider Highland economy". (18)▪ No alternative is given to the high growth scenario. (453)▪ No explanation is given as to how this accords with Policy 35 (Settlement Development Areas). (453)▪ It is difficult to relate the proposed expansion areas to the Green Network SG. It is difficult to see how outlying expanded settlements of Croy, Cawdor, Ardersier will not contribute to the car economy (453)▪ The A96 Corridor Development Framework should not be a basis for this Plan question the assumption the majority of Inverness's growth should be along this corridor due to the need for transport and other infrastructure to develop here at the same rate before yet more housing (172)▪ Proposals threaten an area important for agricultural production and attractive to tourism (172)▪ Concern that the Council's support for the A96 corridor is at the expense of much needed infrastructure and general investment in other areas including Muir of Ord/Beaully/Kiltarlity. There is hardly a mention of these areas. (222)▪ This focus of development of the A96 corridor between Inverness and Nairn, to seek substantial growth in one section of the inner Moray Firth, will further concentrate resources at the expense of the north and west. (443)▪ There is considerable local opposition and self-evident and major			

infrastructure limitations. There are other areas near to Inverness that are equally ripe for development, such as the land North of the Beauly Firth, and out toward Invergordon. (527, 74)

- The corridor policy ignores the needs of remote communities across the Highlands. It is widely recognised (*except in the HWLDP*) that organic development of existing communities can be accommodated affordably in infrastructure terms, and helps enormously to support the provision of local services.
- Documentary evidence of the proceedings of off-site meetings held with these developers in the period leading up to the production of the A96 Corridor proposals should be a matter to be considered at the Inquiry. (527, 74)
- Support the vision of the council for the A96 however should be noted that private finance is incredibly difficult to arrange in the new economic paradigm we are in. (291)
- In relation to para. 10.7.1 SWT agree with THC that each site in the A96 corridor should be defined in a high quality masterplan, with community engagement from the outset to deliver the best output for the area and community. (285)
- THC planners response to comments about excessive population estimates have reduced the scale of housing developments proposed in the A96 framework. In the case of Nairn this has reduced the numbers are still excessive. Landowners and developers to the West of Nairn somehow managed to get 4000 houses on their land added to the framework although no other consultees had supported developing this area to any extent. (67)
- SCDI strongly supports the Highland Campus development. This will generate economic and population benefits for the whole of the region, supporting a skilled workforce and making the Highlands a desirable home for global talent, attracting more inward investment, and growing innovative and internationalising businesses. (180)
- SCDI welcomes support in the *Proposed Plan* for the development of Tornagrain as “an essential component of the settlement strategy”. Accommodating growth in the next 30 to 50 years will be essential if the Inverness city-region is to be an attractive location in which to live and work, and for investment in key priority 21st century business sectors. SCDI believes that Tornagrain can be a leading model for a sustainable community. Roads Infrastructure
- No additional housing should be permitted within the A96 corridor until provision of appropriate access to the A9 to deal with the increased traffic flows. (343)
- Concerns over no immediate investment from Scottish Transport towards A96 improvements and consequent impact of traffic on B9090/B9006 route from proposed growth of smaller settlements (208)
- Priority should be to secure upgrade to A96 and Nairn by-pass to avoid unacceptable traffic congestion on entire road system. (94)
- Infrastructure (including roads and water and sewerage) should be in place before further development on a big scale. (76, 179, 208)
- There must be a Nairn By pass before further development. (76, 179)
- Also wider question over basic infrastructure and developer contributions towards this. (208)

- Development at Tornagrain, Whiteness and West Nairn will lead to a huge increase in commuting, with not the remotest chance that thousands of local jobs will suddenly be produced for these settlements. (67)
- Delnies is too far from central Nairn for walking to school or town, and cycling is perilous. (67)
- Preferred option (for A96 corridor transport) concentrates solely on road development and should include rail. (446)
- Proposals for development of A96 corridor concentrate solely on road while omitting reference to Inverness-Nairn Railway, proposed Park & Ride at Dalcross. This was written in response to question 2 of Main Issues Report rather than the Proposed Plan but was submitted as a representation to the proposed plan. (446)

Infrastructure

- Water supply, waste disposal and transport, development of this scale will require the provision of a new water source this is likely to require to be pumped and consequently increase carbon emissions. New waste disposal infrastructure will need to be put in place and this currently appears to be happening on a piecemeal basis. The necessary improvements to the A9, A96 and A82 will not take place until after 2016 at the earliest, unsuitable minor roads are being utilised as a consequence e.g. B9006. (153)
- There is no infrastructure capacity to support the proposed developments in the A96 corridor. There is on the outskirts of Inverness, at all points of the compass, and there are numerous applications from developers for new housing estates on the fringes of the city. Why then is the A96 concept needed? (527, 74)
- Any substantial new developments should not have any adverse impact on the existing services in the settlement by provision of new services for a new development. (431)
- The ability of the development industry to fund large amounts of infrastructure through developer contributions has greatly diminished. Alternative methods should be considered – such as tax increment financing (291)
- Planning permission for these settlements should not be approved until finance is committed for this transport (Inshes roundabout) or in fact the upgrading of the A96 to accommodate the extra traffic (218)
- Much of the MIR places an emphasis on sustainability, how can putting so many more cars on the road be sustainable? (218)
- What is the order of priorities given to major transport proposals for the area, in particular the A96, the Nairn bypass, the Inches roundabout, the roads accessing the proposed UHI, the Canal crossing, the Southern Distributor Road etc. What intention is there to upgrade the rail connections from Inverness to Aberdeen?
- We see no need at all for the ITLR (eastern end), and provision for which should be deleted from the Plan. (168)

Phasing

- The proposed phasing will ensure major infrastructure is in place at the right time This will be of little use of the infrastructure and links to the

city are not in place at an early stage (193)

- Supports approach to phasing and infrastructure delivery in policy 9. However concerned with the approach being taken to later phases of development within the A96 Corridor as set out at paragraph 10.6 (240).
- Wish to comment further as and when more detail becomes available, however any contribution must be fair and reasonable related to the development proposed. (240).
- Do not agree that sites identified in the current Local Plan for Inverness should be given priority before any major expansion, suggest that unconstrained sites (whether in the A96 Corridor or within the existing Local Plan for Inverness) should be prioritised. (307)
- Welcome support for early phases before major infrastructure is completed, however its also important that any early phases do not restrict the ability for infrastructure to be constructed and land should be safeguarded for this purpose. (307)
- It is not appropriate (para. 10.6, policy 9) [GHJ 1] for it to “resist development” outwith the timescale of this LDP nor to take that view without evidence or monitoring of decisions and progress in the interim nor to do so without a declared mechanism for administering or implementing developer contributions or a clear view about infrastructure programmes. (465)
- It is inappropriate for the Council to predetermine the outcome of a revised A96 Developer Contributions Protocol and its implications for Cawdor without evidence and due consideration of a proposal; and in the knowledge that its proposed Supplementary (465)
- Guidance will be the subject of consultation.
- Homes for Scotland are supportive of the strategy behind the A96 Corridor but feel that infrastructure costs are likely to delay the delivery of new development in this location. (293)
- The Nairn South consortium considers that it would be preferable if the time period ‘(2011-2016)’ were removed to assist in the flexibility in the deliverability of housing land. (333)

Support infrastructure

- The increase in the ageing population requires additional social and medical services. (153)
- There is no indication that the general infrastructure of the region (medical, education, social work, police, elderly care etc) is going to keep pace with the quantity of the housebuilding proposed. This should be addressed before the plan progresses further (218)
- Secondary school – the present school capacity of Millburn, IRA, Culloden and Nairn, are they sufficient to cope with this expansion of the above settlements?

Supplementary Guidance

- Note that the Supplementary Guidance on the A96 has been delayed and it is far from ideal to be considering a general policy without the accompanying detail, it is critical that this information is provided and the key elements of this is incorporated within Local Development Plan

policy. (293)

- A96 Corridor Developer Contributions Supplementary Guidance must ensure contributions are related to the proposed development. The timing or phasing of valid contributions must be considered to ensure development remains economically viable. Appropriate consultation must take place. (267)

Moray Council

- The establishment of full University status for UHI and A96 infrastructure improvements are important to the sustainable growth of Moray, and therefore these proposals are supported.
- A more cautious approach is taken to the expansion of the Retail Park, given this could encourage further leakage from the Moray area, particularly if the requirement for bulky goods is not adhered to.
- This level of development will require significant infrastructure improvements which include a proposed A96 bypass to the south of Nairn, and a rail connection to Inverness airport. The latter should be shown in the Finalised Highland-wide Local Development Plan as a freight and passenger rail halt as the accessibility of the airport and the proposed business growth is important to the wider economy of the Highlands and Moray.
- Improvements to the A96 trunk road and the aforementioned business growth at Inverness airport are beneficial to the economy of Moray and are therefore supported on the basis of appropriate phasing. (403)

SNH

- This policy should be subject to Habitats Regulations Appraisal taking into consideration the in combination effects of development proposals in the A96 Corridor. (118)

Turnberry Consulting for Inverness Airport Business Park Ltd (IABP) (191)

- It is important to state at the outset that IABP Ltd. welcomes the positive references facilitating increased national and international trade (7.2.1),
- Support for IABP as a strategic growth area (8.4), synergies with Tornagrain (12.2).
- Given the scale of IABP and its strategic importance to the A96 Corridor and to the City region as a whole, we would have expected Policy 42 to make express reference to the planning authority's continued allocation long-term commitment to IABP.
- The inclusion of an allocation at Stratton within the Proposed Plan, without an equivalent treatment of IABP, appears inconsistent.(191)
- IABP object to the Proposed Plan, finding it to be inappropriate and insufficient of content in relation to the IABP development proposal.

EMAC for Barratt, Robertson and Scotia. (333)

The Nairn South consortium supports the principle of developer contributions to the A96 corridor and masterplanning for larger mixed use sites demonstrating how the required developer funded infrastructure can be delivered.

- Seek further clarity on the requirements and also to acknowledge that

there will be flexibility on the request for developer requirements to take account of deliverability of housing land in this economic climate.

- The proposed Developer Contribution Supplementary Guidance are relevant to Policy 9 and that this should form part of the Local Development Plan (LDP). As a minimum its publication should be brought forward at the earliest opportunity to allow consultation and further clarity on its implications in terms of Policy 9. (333)
- The preference is that this draft SG should form part of the LDP in order to allow formal consultation at a stage where it can be considered at Examination together with Policy 9. (333)

Employment/Industry/Sustainability

Object to the principles of large scale development in the A96 corridor and wider area;

- The Plan does not evidence the 5000 jobs purported in the MIR, which we assume were predicated on the same projections which aspire a Highland population of 500,000.
- Construction work associated with house building does not provide long-term employment. Sustainable long-term employment is inextricably linked to population growth and economic success. There are no indications expressed that any major companies, in the present economic climate, have been attracted to or will relocate to Nairn or the A96 corridor.
- The approval of planning permission for housing development puts the 'cart before the horse' i.e. build the houses and people will come. It was this type of inverted thinking process that led to global recession. The residents of Nairn and the Highlands expect that lessons should be learned and not repeated. The NRCG consider -
 - Had THC/HIE identified or encouraged major wealth creating Companies (not principally Service-led businesses) to the A96 Corridor, then modest and sustainable growth along the A96 Corridor could have been achievable.
 - That without guaranteed employment, mortgages cannot be obtained, therefore any houses built will remain unsold or vacant.
 - The PP needs to recognise, as does the majority of people in Nairn and the wider Highlands, that Tourism is the prime economic driver for this area and adapt its direction and aspirations accordingly. (209)

Assume there is not going to be employment in these communities for all the people who are going to live in them, hence a need to travel. The B9006 would be one of their main routes and apart from the fact that the road is notorious for accidents, it leads to the Inshes Roundabout which is already a major problem (218)

C Stafford (272)

The HwLDP should, but does not include an IABP policy statement nor a phasing strategy for the Inverness Airport Business Park in the HwLDP. A policy statement for the economic initiative at Inverness Airport Business Park should be included with details of the phasing to 2021. It should note somewhere in the policy that;

- *Within Phase 1, after the occupation of 36,044 square metres gross floorspace, improvement of the Mid Coul Roundabout on the A9(T) road, improvement of 3 short sections of the B9039 and funding for enhancement of public transport services.*
- *include the potential employment outcomes (based on figures – revised downwards to account for poorer economic conditions - submitted as part of the planning application by the applicant that the development holds for the Highland economy (Planning, Environment and Development Committee, 26 September 2007)*
- *that the content of the final A96 Corridor Framework be issued as interim guidance with the Inverness Airport Business Park project recognised as an element of this framework, pending that the finalised Framework be fed into the preparation of the Highland-wide Local Development Plan. (272)*
- *Contrary to advice given at paragraph 16 of SPP, "Investment in infrastructure may be required as a consequence of existing under provision and/or planned growth. These issues should be addressed in development plans and not left to be resolved through the development management process." phasing strategies for long term development (2021 to 2031) in numerous HwLDP policies are being supported with transport issues left unresolved in the HwLDP for this period. (272)*
- *References to phases of development post 2021 should be removed from Policies 10, 12, 13, 20, 21, 22, 23 and from table 14.4 Nairn unless transport delivery mechanisms to support the planned growth from 2021 to 2031 can be clearly demonstrated for that Policy in order to comply with SPP guidance. (272)*
- *Take issue with and object to the fact that section 10.4, "This approach to the development of the A96 Corridor has been informed by a transport study of Inverness and the A96 Corridor, which was prepared in partnership with Transport Scotland. This background report sets out the key transport improvements which must be delivered in order to support the A96 Corridor developments" omits to mention the key role of the rail halt at Dalcross in facilitating the delivery of the new town at Tornagrain. (272)*
- *The Council has failed to define the term 'Central Development Zone', which emerged from the A96 Growth Corridor Development Framework (supplementary guidance) and has therefore failed to include a full list of the settlements considered to fall within this 'Central Development Zone' (272)*
- *Object to the issue of the adoption of the A96 Growth Corridor Development Framework as Supplementary Guidance on the Grounds that it is not fit for purpose and is superfluous to requirement. (272)*
- *Request for an Inquiry into the Emergence of the Development Strategy for A96 Corridor. A public inquiry should be held to test the concept of the A96 Corridor master planning work which has been*

carried forward through the HwLDP. (272)

Modifications sought by those submitting representations:

Remove reference to interim infrastructure improvements (assumed) and ensure that the Nairn bypass precedes any major development in Nairn. (179)

The masterplan for the A96 Corridor is out of date which at best deserves challenge and review. Shoehorning the current masterplan into the HWLDP does not make it a coherent or acceptable blueprint (101)

Homes for Scotland: Provision should be made for early phased development before major infrastructure is complete. This will help to kick-start new development.

The reference to the timescale of 2011-2016 at the end of the 1st line in Policy 9 should be removed. It is sufficient just to refer to 'developments set out in the early period of the Local Development Plan'. Reference to specific timescales could remove flexibility in the policy to take account for any potential delay in delivering the full housing allowances in the initial Local Development Plan period.

Also the Key policy guidance contained in the A96 corridor Developer contributions must be included within the development plan. (293)

Inclusion of policy and statements to support the Inverness Airport Business park including statements of phasing and economic outcomes. (272)

References to phases of development post 2021 should be removed from Policies 10, 12, 13, 20, 21, 22, 23 and from table 14.4 Nairn unless transport delivery mechanisms to support the planned growth from 2021 to 2031 can be clearly demonstrated for that Policy in order to comply with SPP guidance. (272)

The HwLDP must include the statement, ""The phasing of development across the A96 Corridor is closely tied in with the aspirations for the delivery of specific pieces of infrastructure and the need to ensure that all of the new expansion areas develop at a reasonable and complimentary rate" (272)

Reference must be made to the Rail Halt at Dalcross in terms of the rail halt's key role in delivering development on the site described in Policy 12 and no development of the new town should be allowed unless a timescale for delivery of the rail halt can be included in the HwLDP. (272)

Turnberry Consulting for Inverness Airport Business Park Ltd (IABP)(191)

IABP request that in the final Plan, IABP is expressly highlighted as an allocation alongside the other strategic developments identified. (191)

C Stafford (272)

Action sought:

- The Council must surely be required to produce a better quality map than is presented as figure 5 on page 34 in order to clearly indicate the precise area which the 'A96 Corridor' covers; (272)
- The Council should then make clear the link between the area covered by this map and the relevant Developer Contributions Protocols; (272)
- The Council must provide a comprehensive and exhaustive list of future & existing settlements within the A96 Corridor in so far as it is possible to do but in particular taking into account settlements where there is any likelihood of further development taking place in or around them. (272)
- The Council should then indicate which of the settlements would fall within the 'Central Area' and hence establish the full range of settlements which would be required to bear the brunt of the onerous contributions towards infrastructure as set out in the A96 Growth Corridor Development Framework. (272)
- The Council should also indicate which settlements/developments will have been included to calculate the '9000' Inverness East and '7000' Nairn population outcomes by 2041. (272)
- The A96 GCDF must not be adopted as supplementary guidance because of the points as listed in the evidence attached. (272)

Summary of responses (including reasons) by Planning Authority:

Principle of Development

- Development in the A96 Corridor has been a strategic objective of the Council for a number of years, and significant work has gone in to identifying a development strategy which will support the growth of the Highlands over the next twenty years and beyond.
- The 2007 [A96 Growth Corridor Development Framework](#) identified many of the opportunities which are now being promoted through the Local Development Plan. This was approved by the Council as Supplementary Planning Guidance pending the preparation of the Highland wide Local Development Plan.
- [National Planning Framework 2](#) recognises that the A96 Corridor is the main focus for growth in the Inner Moray Firth and refers in detail to the A96 Corridor Development Framework. The Council remains of a view that the principle of development in the A96 Corridor is well established in local and national policy and the Highland wide Local Development Plan is the appropriate vehicle to bring these proposals into a statutory framework.
- The National Planning Framework 2 also makes reference to the need for transport and other infrastructure improvements, and recognises that the STPR has identified the need to dual the A96 between Inverness and Nairn and provide a new rail station, airport interchange and park-and-ride facilities. The Council continues to work closely with Transport Scotland in developing designs for these improvements.
- The economic downturn has proved a challenge for both public and

private sector organisations. Whilst this will affect demand in the short term, the need for a long term vision for the area remains crucial, particularly with wider economic issues affecting Moray, and the opportunities for the region to grasp economic development associated with the renewables industry.

- Planning for the A96 Corridor is not at the expense of the rest of the Highlands – the Council has recently adopted Local Plans in the [West Highlands and Islands](#) and [Sutherland](#) areas which provide a generous and effective land supply for housing and economic development opportunities. The Council is also working closely with other agencies in the Caithness area, seeking to ensure a supply of land is available for the development of the marine renewables sector. Work on the Inner Moray Firth Local Development Plan will also ensure that provisions for the areas outwith the A96 Corridor are also provided for.

Infrastructure

- It is clear that infrastructure should be delivered in tandem with development in the A96 Corridor.
- The provisions set out in the STPR for the A96 Corridor have been welcomed, and Transport Scotland are currently working on a DMRB Stage 2 Design Study for the Inverness to Nairn corridor. This commitment to medium to longer term infrastructure delivery has informed the ongoing development of the planning strategy for the A96 Corridor. The preparation of the Proposed Plan was supported by a [transport study](#) prepared in partnership with Transport Scotland which helped identify a suitable phasing strategy for development.
- Other infrastructure provision has already been committed to across the Corridor. Scottish Water have carried out Water supply and wastewater treatment studies which take account of the short, medium and long term needs in the area, and this has informed their discussions with developers in recent times. A new wastewater treatment plan which will build in capacity over time for the A96 Corridor developments has recently been granted planning permission at Ardersier.

Phasing of Development

- The funding issues associated with infrastructure have necessitated a pragmatic approach to the phasing of development in the A96 Corridor. All of the major allocations set out within this Local Development Plan have been assessed in respect of five year development periods, and discussions carried out with infrastructure providers on that basis. Transport Scotland has supported this approach, which will allow for the longer term design work to be completed. Interim developer requirements have been set out in the plan, and this has informed the decisions already taken by the Council in respect of phase 1 of the Beechwood Campus in Inverness and in respect of the Stratton development in East Inverness. The Council is therefore opposed to any suggestions that these phasing schedules are removed from the

Plan.

- The phasing strategy set out in the Local Development Plan will be used to manage and facilitate development, and to ensure that infrastructure provision does keep pace. It is not anticipated that housebuilders will build homes that cannot be sold, particularly in the current economic climate.

Supplementary Guidance

- The Plan refers to the preparation of Supplementary Guidance in respect of the A96 Corridor. Respondents have stated the need to ensure that this guidance is in place as soon as possible. The Council agrees that this Guidance is required as soon as possible, although it is dependent on discussions with Transport Scotland on the outcomes of design work on the A96 Corridor and the potential funding issues associated with it. Further information is given in respect of this issue in the Schedule 4 for Issue 32.

Inverness Airport Business Park

- The Proposed Plan did not provide a specific allocation for the Inverness Airport Business Park on the basis that this was allocated in the Inverness Local plan and the Council was minded to grant Planning Permission subject to a Section 75 Agreement (see [Committee Report](#)). In light of the objections made to the fact that it does not appear, the Council would be content for details to be shown in the finalised Local Development Plan, and if the reporter is so minded, they may wish to clarify the detail required in order to allow this to happen.

Habitats Regulations Appraisal

- The HRA is underway and discussions are continuing with SNH. The outcomes will be submitted to the Reporter prior to the Examination.

Any further plan changes commended by the council

- More information to be added to the A96 Corridor Framework Plan to show Inverness Airport Business Park, the Dalcross rail halt and the Green Network.

Reporter's conclusions:

Added by Reporter at later date.

Reporter's recommendations:

Added by Reporter at later date.