

Agenda Item	8
Report No	CIA/42/17

THE HIGHLAND COUNCIL

Committee: City of Inverness Area

Date: 30 November 2017

Report Title: Inverness City Centre Development Brief

Report By: Director of Development and Infrastructure

1. Purpose/Executive Summary

- 1.1 This report seeks approval for a finalised version of the Inverness City Centre Development Brief along with the suggested Council responses to comments made during the public consultation on the draft earlier this year. The purpose of this Brief is to promote and guide opportunities for regeneration, development and enhancement of Inverness city centre. The finalised version of the Development Brief is enclosed at **Appendix 1**. The respondents to the consultation are listed in **Appendix 2** along with a summary of the comments received and recommended responses. Subject to Committee approval, officers will take steps to formally adopt the brief as statutory Supplementary Guidance to the Council's Development Plan.

2. Recommendations

- 2.1 Committee is invited to:
- i. agree for the Inverness City Centre Development Brief at **Appendix 1** to be taken forward as statutory Supplementary Guidance to the Development Plan, including referral to Scottish Ministers for formal adoption; and
 - ii. note the comments received during the Draft Inverness City Centre Development Brief consultation and agree the recommended Council responses contained in **Appendix 2**.

3. Background and Purpose

- 3.1 The first Inverness City Centre Development Brief (ICCDB) was approved by this Committee as Supplementary Guidance to the Highland-wide Local Development Plan in October 2012 and adopted in March 2013. Its purpose was to guide decisions on development, including planning applications, in Inverness city centre.
- 3.2 Work to update the ICCDB began in April 2014 with a public consultation that identified three key priorities to attract people to visit, live, work and invest in the city centre:
1. Improvements to City Centre access and connections.
 2. Development of Academy Street and its surroundings.
 3. Redevelopment of key sites to create visitor and cultural attractions.
- 3.3 These priorities were incorporated into and highlighted in a Draft ICCDB that was approved for public consultation by this Committee on 1 December 2016. The Draft Brief also reflected feedback received from Members of this Committee during a stakeholder workshop that took place in May 2016, and through discussions with sectoral interest groups in September 2016.

4. Draft Development Brief Consultation

- 4.1 The consultation on the Draft ICCDB ran for six weeks from 3 February to 20 March 2017. During this time the Draft Brief was available to view and comment online through the Council's consultation portal consult.highland.gov.uk. Two public drop-in events were also held in the Eastgate Shopping Centre and the Town House. The consultation was widely publicised in a number of ways including:
- emailing stakeholders, agencies and businesses including CIA Committee Members, the Inverness Design Review Panel, Disability Groups, Community Councils, and individuals registered on the consultation portal who have expressed an interest in the Inner Moray Firth Area;
 - placing a series of promoted targeted post on social media;
 - the distribution of flyers to over 500 local businesses by Inverness BID;
 - placing a notice in the local press and providing information for additional press articles; and
 - circulating posters to libraries and service points in and around Inverness.
- 4.2 The public exhibitions were collectively attended by approximately 50 people, with interest being expressed by members of the public and representatives of community councils, charities, campaign groups and stakeholders.
- 4.3 The web-based version of the Brief attracted a significantly higher level of interest than the public exhibitions. Although it is not possible to calculate the exact number of people who accessed the consultation webpages, an analysis of website activity shows that over 300 unique visits were made to view the online version of the Draft Brief during the consultation period.
- 4.4 Overall, 220 comments were received from 35 consultees representing two Community Councils, three public agencies, seven business interests, nine charities/campaign groups, and 13 individuals - all listed in **Appendix 2**. Of the 35 responses received, 28 were submitted online and 7 in writing, reinforcing the growing trend for increased use of the Council's consultation portal. Despite this trend, two consultees queried whether it is reasonable of the Council to expect respondents to use the online consultation

portal. Members' attention is drawn to Development Plans' ongoing commitment to inviting and accepting comments by letter or email if a respondent agrees this in advance with a member of the team.

- 4.5 **Appendix 2** provides a summary of the comments received together with the recommended Council response. Verbatim comments received can also be viewed on the Development Plans consultation portal and overview of comments received is provided below.
- 4.6 **Crown City Centre Community Council (CCCC)** was generally supportive of the vision, priorities, and criteria set out in the Brief, in particular its focus on increasing the number of city centre homes, transforming Inverness castle into a visitor/cultural attraction, restricting HMO bedspaces, improving redundant or derelict buildings, and sensitive re-development of heritage assets in particular Viewhill House and Porterfield. Their response drew attention to challenges in delivering proposed outcomes including a need for: positive incentives to bring empty/redundant buildings back to use; measures to avoid and prevent anti-social behaviour; specific measures to promote cycling, including safer cycle environments. It also queried whether peripheral shopping and business proposals can be resisted in favour of the city centre.
- 4.7 **Kiltarlity Community Council (KCC)** questioned whether the Brief will deliver a better future for the Inner Moray Firth area. Their response noted that the Brief lacks a plan to make Inverness a public transport hub, including identified outcomes, and requested prioritisation of public transport investment over other spending choices because better links to surrounding settlements will increase city centre footfall. It also expressed the view that the long term vision for the city centre will not be delivered until problems arising from anti-social behaviour are resolved.
- 4.8 **Public agencies** were supportive of the Brief. Historic Environment Scotland welcomed and supported priorities, principles and guidance relating to the built heritage and expressed interest in maintaining dialogue with the Council to bring redundant historic buildings back to active use. SEPA requested a reference to the city centre's Air Quality Management Area and sought amendments to Brief to support the delivery of the related Action Plan, protect and enhance green infrastructure, and encourage energy efficiency and low carbon heat technologies. SportsScotland sought assurance that the existing sports provision at the Northern Meeting Park would not be adversely affected by widening access for outdoor leisure/recreational activity.
- 4.9 **Business** respondents expressed strong support for the Brief. Inverness BID regarded the Brief as an important asset to future planning, investment and development in the city centre. In particular it welcomed the focus on increasing footfall and bringing redundant space back to active use, and the proposed cap on HMO bedspaces. Stagecoach expressed strong support for the Brief's priorities but sought increased measures to promote public transport use. The Port of Inverness and Inverness Marina welcomed the emphasis on active travel and visitor attractions, and stressed the importance of attracting visitors to destinations that are within walking distance but outwith the boundary of the city centre.
- 4.10 The response was mixed from **NGOs**, including **charities and campaign groups**.
- 4.11 Inverness Civic Trust (ICT) agreed with many of the Brief's priorities, development criteria and principles, and the long term potential for high quality, mixed use development between Longman Road and the river. They considered the brief lacked

vision and boldness, however, particularly in relation to the potential to reconfigure and improve transport infrastructure. Their response called for the preparation of an Integrated Transport Plan for the city. It also asked Members to consider using Inverness Common Good Funds to provide VAT relief on repairs to Listed Buildings, and requested relocation of Council headquarters to the former Inverness College Longman site.

- 4.12 Five NGOs requested closer attention to the needs of disabled people accessing and moving through the city centre. Some provided detailed, site specific advice on the access needs of pedestrians with visual impairment. Living Streets put forward a 19-point vision to make the city centre safe and attractive for walking and cycling. The Highland Cycle Campaign called for the removal/restriction of private motor vehicles from the city centre and provided detailed design standards for new/existing segregated cycling routes, including crossings, contraflows, and restricted use of shared-use paths.
- 4.13 The Highland Historic Buildings Trust suggested ways to enhance the setting of the built heritage (such as increased pedestrian priority, more greenspace and public realm improvements) and welcomed the importance attached to sensitive re-development of Viewhill House and Porterfield.
- 4.14 The absence of proposals to re-locate/re-develop the bus station was queried by a number of individuals and NGOs.
- 4.15 The majority of comments from **individuals** related to movement/transport issues including requests to: prioritise all-abilities access and designated, off-road or segregated to separate cyclists from pedestrians; limit shared use paths; and increase use of public transport, including Park-and-Ride. Comments were also received on public art, expanding cultural attractions and retail choice, the Northern Meeting Park, re-development of Porterfield and Glebe Street, residential amenity, benches, public toilets, built heritage, design quality, green infrastructure, and securing 'low-carbon, green city' status.

5. Recommended Changes to Development Brief

- 5.1 **Appendix 2** provides a summary of comments received and recommended Council responses including a list of the minor amendments made to the Brief, which can be summarised as follows:
- 'prosperous' was inserted into the vision for 2030;
 - references were added to:
 - the city centre's Air Quality Management Area and how the Brief complements and will help to deliver some aspects of the Draft Air Quality Action Plan;
 - two forthcoming projects to develop detailed designs/deliver active travel improvements in the city centre (Community Links, Community Links Plus); and
 - the forthcoming city centre Trade Waste Pilot Project;
 - development criteria were amended as follows:
 - criterion V5 text was amended to ensure protection of riverside environment, make reference to respect for pedestrian and cycle desire lines;
 - A2 was revised to require development to follow Transport Scotland guidance Cycling by Design 2010;
 - D8 was renamed 'Natural heritage and the environment' and amended to ensure

- protection of natural environment of the River Ness; and
- D9 was added to require development proposals to give consideration to potential impact on air quality;
- Placemaking Principle 13 was renamed ‘Openspace/Green Infrastructure’ and expanded to emphasise the importance of protecting and enhancing green infrastructure;
- clarification that:
 - developer contributions will be sought towards promotion of public transport;
 - the Council is committed to widening education and enabling students to play a role in the city’s development; and
 - the Council will encourage energy efficiency and low carbon heat technologies in all new city centre development;
- the development priority for *Accessible, Safe and Easy to Move Around* was adjusted to make reference to ‘people of all abilities’;
- Developer Contributions (Section 8) was amended to:
 - Bring rates and instances where contribution variations or exemptions may be favourably considered into line with the Draft Developer Contributions Supplementary Guidance which was approved by the 8 November 2017 Environment, Development and Infrastructure Committee for consultation; and
 - clarify the requirement for contributions towards wayfinding components;
- the reference to potential for a new mixed use neighbourhood north of the city centre (outwith Brief area) was expanded, addressing opportunities to extend the riverside walkway;
- terminology was corrected to: refer to ‘disabled people’ and include various requested definitions; and
- maps were revised, including the addition of greenspace to Map 5.1, to amend or improve content for use in Development Management.

6. Next Steps

- 6.1 The Development Brief establishes the Council’s detailed planning policy for the city centre and it will be vital to future planning decisions in the area. It will play an important role in helping to deliver the Highland-wide Local Development Plan and the adopted [Inner Moray Firth Local Development Plan](#).
- 6.2 Approval of this Development Brief will enable progress to the final stage in adopting this as Supplementary Guidance. This involves the brief being submitted to Scottish Ministers for a 28 clearance period. It is intended to adopt this as supplementary guidance to the [Inner Moray Firth Local Development Plan](#) forming part of the Council’s statutory Development Plan.

7. Implications

- 7.1 Resource: Resources to complete statutory processes for the ICCDB are allowed for within the service budget.
- 7.2 Legal: It is possible for a legal challenge to be made on the Development Brief but due process has and will be followed and therefore the Council will have a defensible position in the event of any challenge.

- 7.3 Community (Equality, Poverty and Rural): The Brief will promote and guide opportunities for regeneration, development and enhancement of Inverness city centre, leading to the provision of new jobs, housing, facilities and services.
- 7.4 Climate Change / Carbon Clever: By promoting active travel improvements that make it convenient and attractive to access city centre destinations on foot or by bicycle, the Development Brief will increase walking and cycling levels and discourage private car use. The Brief also encourages energy efficiency and use of low carbon heat technologies in all new development. This focus on active travel and sustainable energy will help to reduce or limit the city centre's carbon footprint and fulfil wider carbon clever objectives.
- 7.5 Risk: There are no known significant risks associated with the Brief.
- 7.6 Gaelic: Gaelic headings will be added to the Brief prior to publication.

Designation: Director of Development and Infrastructure

Date: 14 November 2017

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Development Plans

Background Papers:

1. City of Inverness Area Committee [Report](#) and Minutes, 1 December 2016

Summary of comments on Draft Inverness City Centre Development Brief and recommended Council responses

November 2017

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List of respondents

Community Councils

Crown City Centre Community Council
Kiltarlity Community Council

Government/Statutory Bodies

Historic Environment Scotland
SEPA
sportscotland

Business

Inverness BID
Inverness Marina
Port of Inverness
Stagecoach
Graham + Sibbald
Carplus Bikeplus
Masonic Properties Inverness Ltd

NGOs (including charities and campaigning groups)

Guide Dogs Scotland
Highland Cycle Campaign
Highland Historic Buildings Trust
Highland Housing Alliance
Highland Senior Citizens Network
Inverness Civic Trust
Living Streets
Paths for All
Theatres Trust

Individuals

Lesley McDade
Ian Phillips
Rosalind Maclennan
Richard Newmark
Roger Reed
Nicholas McShane
Neil Hornsby
Virginia MacNaughton
Ron Stewart
Richard Ardern
Lindy Cameron
Rod Murchison
Helen Wilson

Preamble	
This report provided a high level summary of the pertinent points raised in the feedback received to the ICCDB consultation. It does not attempt to summarise and address every comment received. All verbatim comments received are available to view on the consultation portal at consult.highland.gov.uk via the closed consultation document or by selecting the 'Who Said What?' tab and searching by consultee or agent.	
Vision, Outcomes and Approach	
Question 1: Do you agree with the vision and outcomes for 2030? Tell us why.	
18 respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u> <ul style="list-style-type: none"> Generally agrees with vision but queries why statement does not emphasise business focus. 	Accepted: prosperity integrated into the vision.
<u>Kiltarlity Community Council</u> <ul style="list-style-type: none"> Sees little to indicate the Brief will deliver a better future for the Inner Moray Firth area. 	Noted.
<ul style="list-style-type: none"> Considers claims that Inverness is a public transport hub for the Inner Moray Firth area (Para 1.1) are not being delivered on. For this transport hub to become a reality the development planning process needs a real plan, with identified outcomes. 	Noted. The role of this Brief is to set priorities and criteria for future development in the city centre that focus resources and investment in key outcomes, including improvements to infrastructure for walking, cycling and access to public transport.
<ul style="list-style-type: none"> The Council should consider prioritising basic transport needs over other spending choices put forward in the brief. 	Noted.
Government/Statutory Bodies	
<u>SEPA</u> <ul style="list-style-type: none"> Welcomes Brief's support for active travel. Disappointed by inadequate consideration of benefits that the natural environment brings to city centre vitality and viability. River Ness corridor should be celebrated as a positive environmental feature and should be protected from inappropriate development as required by THC's Green Networks Supplementary Guidance. Strategy diagram (Map 1.3) should acknowledge this and Para 1.10 should be amended to "complements and enhances the visual, spatial <u>and environmental</u> 	<p>Support noted.</p> <p>Noted: However the Council would maintain that the general theme of Inverness's unique natural, cultural and built heritage is woven throughout the brief. In particular the 'Distinctive and Attractive' Outcome and the text that accompanies it promotes the natural environment and the River Ness Corridor. As accepted below, the addition of "and environmental" to renumbered paragraph 1.11 will help to stress this point.</p> <p>Accepted: Strategy diagram (relocated to the inside front cover of the finalised Brief) amended to highlight need to safeguard green infrastructure, including</p>

<p>character of the city centre”.</p> <ul style="list-style-type: none"> - Queries Brief’s failure to refer to designated Air Quality Management Area and absence of detailed analysis of how Brief will help to deliver the related Action Plan. - Para 2.3 “Accessible, Easy and Safe to Move Around” should be amended to: A network of safe, attractive routes gives clear priority to walking, cycling and use of public transport while ensuring efficient access for vehicles, including parking, <u>improving local air quality</u>. - Para 2.3 “Distinctive and Attractive” Outcome should be amended to include the following text at the end: ‘improving local air quality where required’. - Paragraph 2.4 should be amended to ensure the role of the River Ness as an open space corridor and the measures needed to address local air quality issues are acknowledged. Suggests amending the third bullet point: ‘Maximise the role of the River Ness as an important <i>open space corridor</i> and civic asset. Suggests amending fifth bullet point to: ‘Make it convenient and attractive to access city centre destination on foot or by bicycle or public transport, <i>improving local air quality where required</i>.’ 	<p>protection of River Ness Corridor from inappropriate development. Re-numbered Paragraph 1.11 amended to include additional text.</p> <p>Accepted: Section 7 (Distinctive and Attractive) has been expanded to:</p> <ul style="list-style-type: none"> • Make reference to the air quality problem at the junction of Academy Street and Queensgate and illustrate the extent of the Air Quality Management Area. • Explain how the Brief complements and will help to deliver some aspects of the Air Quality Action Plan. • Add Development Criterion D9 requiring development proposals to give consideration to potential impact on air quality. <p>Noted: The Outcomes have not been changed but the priorities for Distinctive and Attractive (Section 7) have been expanded to confirm that the Brief supports delivery of the Council's Draft Air Quality Management Plan.</p> <p>Accepted: Suggested text added to third and fifth bullet points.</p>
Business	
<p><u>Inverness BID</u></p> <ul style="list-style-type: none"> - Overall supportive of Brief themes and aspirations, in particular the 2030 vision for a vibrant and unique city centre on the river, well connected and accessible and valued as an attractive place to live, work and visit. 	<p>Support noted.</p>
<p><u>Carplus Bikeplus</u></p> <ul style="list-style-type: none"> - These are excellent outcomes. - Giving priority to walking, cycling and public transport will help to fulfil commitments to tackling climate change and air pollution, and reduce the need to bring private vehicles into the city. 	<p>Support noted.</p>
<p><u>Port of Inverness (POI)</u></p>	

<p><u>Inverness Marina</u></p> <ul style="list-style-type: none"> - Welcomes and supports the proposed Vision and Outcomes for 2030 - but encourages recognition that: <ul style="list-style-type: none"> ▪ the city centre’s economy, development and attractiveness are supported by a diverse range of facilities and activities delivered by businesses and industries in the wider region; ▪ the Port area can make an important and positive contribution to enhancing and developing visitor attractions in the city; ▪ the visitor experience does not begin or end in the city centre and is influenced by how easy and attractive it is to travel to and from the centre. - Strongly supports convenient and attractive access to city centre destinations on foot, by bicycle or public transport. - Seeks improved connectivity between the Port and the city centre such as use of new flood walls to develop attractive pedestrian/cycle access to new facilities and visitor attractions. 	<p>Accepted: Section 4, Para 4.1 revised to highlight importance of visitor attractions within walking and distance of the city centre. Section 6, Para 6.10 added to acknowledge opportunity to extend the riverside as an attractive walking and cycling corridor and refer to wider destinations/attractions, including National Cycle Route 1 which passes the Port/Marina.</p> <p>Support noted.</p> <p>Accepted: See reference to revised Section 6 above. A Draft Wayfinding Strategy will be issued for public consultation in early 2018 (subject to approval by the City of Inverness Area Committee).</p>
<p><u>Stagecoach</u></p> <ul style="list-style-type: none"> - Supports outcome making city centre accessible, easy and safe to move around but queries whether emphasis on parking undermines use of public transport. Queries and reflects on how the city can/should achieve reduced car-dependency, including parking policy and pricing, managing through-traffic volumes and promotion of public transport. - Out-of-town “park and ride” solution enables bus services to take priority over slower, car-borne traffic. - Highlights potential to expand current significant volume of bus passenger journeys (3.3 million in the past year) to and from the city centre. 	<p>Support noted. The Brief reflects current Council policy on city centre parking and how this is enforced, including changes agreed by the City of Inverness Area Committee on 14 September 2017, and 3 December 2015. Whereas it is not within the Brief’s remit to prescribe changes to public transport provision, Development Criterion A4 has been amended to confirm that, where appropriate, contributions will be sought towards promoting use of public transport (as set out in Section 8 Developer Contributions). Para 6.8 confirms the Council’s commitment to facilitating use of public transport by adjusting parking requirements for new development where proposals can demonstrate a high level of good quality, non-car accessibility.</p> <p>No change: the city’s first Park-and-Ride facility has been consented as part of the outline planning permission for new development at Stratton, East Inverness and is expected to be delivered as part of this phased development.</p> <p>Accepted: Para 6.1 amended to refer to significant volume of bus passenger journeys.</p>
<p><u>Graham + Sibbald</u></p>	

<ul style="list-style-type: none"> - Fully supports the preparation of a Development Brief for Inverness city centre, which represents a proactive approach to stimulating development. Encouraged by the Brief's approach to promoting Inverness City Centre as a place for business, tourism and to live. This sets out a positive message and demonstrates that the Council is open for business. 	<p>Support noted.</p>
<p>NGOs (including charities and campaign groups)</p>	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Priorities should be re-ordered, to make the first priority 'A thriving place, to work and to live'. - Seeks further emphasis on widening education and enabling students to play a crucial role in the development of the City to 2030 and beyond. 	<p>Accepted: text amended. Outcomes have not, however, been re-ordered because the current order has evolved through discussion and consultation with a wide range of interest groups.</p> <p>Accepted: Para 1.8 added to confirm Council support for ongoing development of Inverness Campus as a centre for academic and business excellence that will enhance options for the retention of young people within the City and Region and encourage sector growth.</p>
<p><u>Guide Dogs Scotland</u></p> <ul style="list-style-type: none"> - Supports key outcome to make city centre accessible, easy and safe to move around subject to ensuring that cyclists and pedestrians, including people with a visual impairment, are physically separated to promote freedom to cycle and pedestrian safety. - Puts forward detailed advice on meeting the needs of pedestrians with visual impairment, including site specific advice on Academy Street crossings. 	<p>Accepted: Outcome 4 amended to emphasise importance of promoting all-abilities access.</p> <p>Noted – no change: setting prescriptive, site specific proposals to modify existing infrastructure is outwith the remit of this Brief. This advice has, however, been brought to the attention of the Council's Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland's Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p>
<p><u>Paths for All</u></p> <ul style="list-style-type: none"> - (Para 2.3) Supports the outcome for 2030 to make the city centre accessible, easy and safe to move around. 	<p>Support noted.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - (2.4) The Brief's approach to development should include a commitment to "remove/restrict private motor vehicles from the city centre". 	<p>Noted. Para 2.4 has been amended to confirm that the approach to development includes: incentivising alternatives to car-use and car-ownership by improving</p>

	active travel infrastructure, offering flexible levels of on-site parking, and facilitating use of public transport.
<p>Living Streets</p> <ul style="list-style-type: none"> - Considers the vision to be fine but the outcomes unachievable because the purpose of the Brief is to guide development, not provide facilities. - Queries Brief's lack of detailed proposals on access improvements and puts forward a 19-point vision to make the city centre safe and attractive for walking and cycling. - Queries: accuracy of statements about A96 dualling (Para 1.3) and Eastlink (Para 1.4); whether the Council will enforce IMFLDP Policy 1 (Para 1.14); whether development already underway (Para 2.5) will contribute to delivering the proposed outcomes of the Brief (para 2.3); accuracy and relevance of map content (Map 1.3). 	<p>Noted – no change. By setting priorities and criteria for development in the city centre the Brief helps to determine how future development in the city centre will contribute to achieving these outcomes. It will also guide resources and investment towards the delivery of the vision for 2030.</p> <p>Noted – no-change: setting prescriptive, site specific proposals to modify existing infrastructure is outwith the remit of this Brief. Instead these proposals have been brought to the attention of the Council's Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland's Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p> <p>Noted: in December 2011 the Scottish Government announced its intention to fully dual the A96 by 2030, beginning with the upgrading of a 30km stretch between Inverness and Nairn. The Inverness and Highland City-Region Deal announced in March 2016 will support the development of the A9/A96 Inshes to Smithton Link Road (East Link). Suggested modifications to Map 1.3 have been considered and where relevant, incorporated into the strategy diagram relocated to the inside front cover of the finalised Brief.</p>
Comments from individuals	
<ul style="list-style-type: none"> • Agrees with vision and outcomes but more needs to be done to separate cyclists from pedestrians for the safety of both. • All-abilities access must include provision for wheelchair users etc. • Create additional outcome to make Inverness "A low-carbon, green city" enabling easy access by active travel or low-carbon transport to services, facilities and infrastructure. 	<p>Support noted – no change. Proposed changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>No change: options to create a separate outcome have been reviewed and we consider that "low-carbon, green" objectives are implicitly addressed in Section 6, which promotes active travel and public transport use, and new Para 2.5, which confirms the Council's commitment to encouraging energy efficiency and low carbon heat technologies.</p>

A Great Place for Business	
Question 2: Are these the right priorities to make the city centre a great place for business? Tell us why.	
9 respondents.	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u> <ul style="list-style-type: none"> Supports priority to tackle empty and redundant buildings – but notes difficulty of doing so without positive incentives. 	Support noted. By providing planning policy support for bringing redundant buildings and spaces back to active use,
Government/Statutory Bodies	
<u>SEPA</u> <ul style="list-style-type: none"> Supports a new urban quarter at the southern edge of the Longman and suggests the provision of more greenspace in this area to make up for limited provision elsewhere in the city centre. Add the following text at Para 3.4 <i>“Emphasis will be put on the include of new green spaces to add to the green network with the city centre and help support active travel choices to the bus and rail stations which are in easy walking distance.”</i> 	<p>Support noted. New Para 2.7 highlights the potential for a new mixed-use neighbourhood in this area, subject to compatibility with nearby industrial uses.</p> <p>Noted: the “new urban quarter” is a longer term aspiration in an area that is not yet allocated for development in the Council’s Development Plan. New para 2.7 makes reference, therefore, to its potential to provide new greenspace and promote active travel.</p>
Business	
<u>Port of Inverness (POI)</u> <u>Inverness Marina</u> <ul style="list-style-type: none"> Support for the Brief’s priorities. In favour of increased footfall generating uses beyond the city centre boundary where these encourage interconnection between a diverse range of facilities. 	<p>Support noted.</p> <p>Noted – no change. Footfall generating uses may be supported outwith the city centre but will require to be assessed against IMFLDP Policy 1: Promoting and Protecting City and Town Centres.</p>
<u>Stagecoach</u> <ul style="list-style-type: none"> Strong support for the priorities and by attracting a better mix of accommodation will encourage business. 	Support noted.
NGOs (including charities and campaign groups)	
<u>Living Streets</u> <ul style="list-style-type: none"> Questions extent of THC HQ Site 20 on Map 3.1, associated greenspace on Ardross Street and disagree with site being developed due to potential loss of car parking which is used by Eden Court for evening events. Requests more appropriate shop frontages for 1-17 Union Street. 	<p>No change: site boundary reflects IMFLDP site allocation IN22, confirming that the principle of redeveloping this site has already been accepted.</p> <p>No Change: Map 3.1 identifies this site as being suitable for renovation /</p>

	conversion. Any associated shopfront changes will be required to comply with emerging planning guidance on shopfront alterations and design, as set out in Section 7, Criteria D6 of the Brief.
Comments from individuals	
<ul style="list-style-type: none"> Request for an additional priority for the public sector to invest in the city centre which will give other businesses confidence. 	No change: Section 3 already sets a priority to “Identify sites for office space to attract public and private sector organisations to locate, remain and expand in the city centre.” Whilst public sector investment in city centre is ongoing, it is outwith the remit of the Brief to prescribe how the public sector should allocate resources.
<ul style="list-style-type: none"> Suggested city centre boundary amendment to include Grant Street. 	No change – the boundary reflects the extent of the city centre as agreed through the IMFLDP.
<ul style="list-style-type: none"> Suggestion of configuring shop(s) on Union Street to accommodate a number of businesses which would benefit footfall; could result in more pedestrianised areas / parking improvements for Union Street and Queensgate. 	No change: development to re-configure shops and businesses could take place without being identified as an explicit proposal in the Brief. The Brief identifies both Union Street and Queensgate as important pedestrian routes (see Map 6.1). Union Street has already benefited from streetscape improvements. Other streets are prioritised for active travel improvements, particularly those associated with Inverness Railway Station improvements.

Question 3: Do you agree with these development criteria? Tell us why.	
5 respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u> <ul style="list-style-type: none"> Agrees with criteria. Queries extent to which peripheral shopping and business proposals can be resisted in favour of town centre. 	Support noted. Noted. Criterion B1 clarifies that any proposed footfall generating uses would be subject to IMFLDP Policy 1: Promoting and Protecting City and Town Centres.
Business	
<u>Inverness BID</u> <ul style="list-style-type: none"> Development that increases public footfall in the city centre should be encouraged. 	Support noted. Criterion B1 clarifies that any proposed footfall generating uses would be subject to IMFLDP Policy 1: Promoting and Protecting City and Town Centres.

<ul style="list-style-type: none"> - Vacant upper floors above retail units must be brought back to active use, preferably as offices to generate footfall. 	<p>Noted – no change: given the extent of upper floor vacancies, it is important not to restrict development to solely business use. The Brief needs to enable and promote a diverse mix of uses in the city centre in response growing demand for residential accommodation, tourist facilities and leisure attractions.</p>
<p>NGOs (including charities and campaign groups)</p>	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Proposes THC HQ relocates to the former Inverness College site to release the HQ for housing and cluster public service buildings at the Longman, which would encourage other agencies /businesses to locate there. - Endorses development of the new justice centre site and on the former college site, providing all proposals are of high quality design. - Supports the long term potential for high quality mixed use development between former College site and the river, enabling the ‘vision’ to extend westwards from Longman Road to the harbour. - Suggests a wider range of business rate incentives to overcome difficulty of attracting small businesses to the city centre. - Acknowledges perception that parking is an issue, despite evidence to the contrary. 	<p>Suggestion noted - no change: whilst there remains long term potential to relocate THC HQ, its future location should not be restricted to one particular site in the Brief.</p> <p>Support noted.</p> <p>Support noted. New Para 2.7 highlights the potential for mixed-use in this area, subject to compatibility with nearby industrial uses.</p> <p>Noted – no change: rateable values are not set by the Council. They are set by the independent Assessor appointed by the Highland and Western Isles Valuation Joint Board and multiplied by the appropriate rates poundage set by the Scottish Government. The Council proactively maximises rate relief entitlements such as the Small Business Bonus, Fresh Start and new start reliefs.</p> <p>Noted.</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> - Agrees with development criteria. - Amend city centre boundary to include Grant Street. - Agrees with development criteria - but seeks tougher requirement for developers to adhere to them. 	<p>Support noted.</p> <p>No change – the boundary reflects the extent of the city centre as agreed through the IMFLDP.</p> <p>Support noted. By introducing criteria and principles for the quality of development in the city centre, including site-specific guidelines for key sites, the Brief introduces new parameters and requirements that will guide determination of future planning applications.</p>

Question 4: Do you have any other comments on making Inverness a great place for business? Please reference the section/paragraph number where appropriate.	
6 respondents	
Summary of comments received	Proposed response
Business	
<u>Graham + Sibbald</u> <ul style="list-style-type: none"> - Policy should support non-retail ground floor uses. - Requests consideration of compulsory purchase and land assembly powers to bring development forward / bring buildings back into use, particularly more Class 4 office space in the city centre. 	<p>No change: Development Criterion B1 makes clear that all footfall generating uses (including but not limited to retail) are supported at ground floor level.</p> <p>Noted - no change: while a Local Authority has CPO powers, the Brief is not the appropriate instrument to set out where these powers will be utilised.</p>
<u>Port of Inverness</u> <u>Inverness Marina</u> <ul style="list-style-type: none"> - Supports this outcome. - Stresses the importance of developing better connectivity between the city centre and the marina, particularly when considering development proposals. 	<p>Support noted.</p> <p>Noted. New Para 6.10 identifies the opportunity to extend the riverside as an attractive walking and cycling corridor. Map 6.1 already set outs important pedestrian routes that extend along the riverside. A Draft Wayfinding Strategy will be issued for public consultation in early 2018, subject to approval by the City of Inverness Area Committee, which will signpost the Port/Marina.</p>
<u>Carplus Bikeplus</u> <ul style="list-style-type: none"> - Encourage businesses to make use of the local car club for business travel, which reduces the need for city centre parking. 	<p>Noted – no change. Section 6, Action 8 has, however, been amended to acknowledge recent introduction of car club schemes and Council commitment to engage with operators seeking appropriate ways to increase uptake, including monitoring demand.</p>
NGOs (including charities and campaign groups)	
<u>Highland Cycle Campaign</u> <ul style="list-style-type: none"> - Parking should not be a priority. Evidence from elsewhere shows increased footfall and trade in areas where that traffic has been removed/restricted. 	<p>Noted - no change: The Brief reflects current Council policy/enforcement of city centre parking, including changes agreed by the City of Inverness Area Committee on 14 September 2017, and 3 December 2015.</p>
Comments from individuals	
<ul style="list-style-type: none"> • Proposals for Inverness East could have an adverse impact on city centre commercial activity. 	<p>Noted. The emerging Inverness East Development Brief will set out how this area will be developed to comply with IMFLDP Policy 1: Promoting and Protecting City and Town Centres.</p>

<ul style="list-style-type: none"> In favour of park-and-ride and potential rail connection from East Inverness. 	<p>Noted. The city's first Park-and-Ride facility has been consented as part of the outline planning permission for new development at Stratton, East Inverness and is expected to be delivered as part of this phased development. The Council is working with HITRANS to further investigate the feasibility of a rail halt at a suitable location in East Inverness.</p>
<ul style="list-style-type: none"> In favour of a re-configured bus and rail station. 	<p>Noted - no change: while opportunities may arise in the longer term to reconfigure the bus station, the Council's current priority is to promote improvements to Inverness Rail Station, including improved pedestrian connections between the rail and bus stations.</p>

Question 5: A Great Place to Visit	
Q5) Are these the right priorities to make the city centre a great place to visit? Tell us why.	
8 respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u>	
<ul style="list-style-type: none"> Generally agrees with these priorities. Highlights need to improve the attractiveness of the Old Town, Victorian Market and High Street. Seeks measures to avoid and prevent social nuisance issues. 	<p>Support noted.</p> <p>No change: The Brief puts forward Placemaking Principles (Section 7) that identify how development can improve the visual and spatial character of buildings and streets in the city centre. (Site 3) Site-specific Development Guidelines identifies priorities and parameters for improving the Victorian Market.</p> <p>Noted – no change. It is outwith the remit of the Brief to prescribe measures that directly address anti-social behaviour.</p>
Business	
<u>Stagecoach</u>	
<ul style="list-style-type: none"> Improvements sought for the gateways into the city centre, particularly access routes from the bus station and associated wayfinding signage. 	<p>Noted – no change: Map 6.1 highlights priority routes for active travel improvements, including routes leading to/from Farraline Park. More detailed development guidelines for some routes are set out in Appendix A – Station Quarter Sites 1 and 2. Re-numbered Para 6.6 has been updated to refer to a Draft Wayfinding Strategy that will be issued for public consultation in early</p>

	2018, subject to approval by the City of Inverness Area Committee.
<u>Port of Inverness</u> <u>Inverness Marina</u> <ul style="list-style-type: none"> - Supports the proposed outcome and are pleased that the Brief recognises the importance of tourism. - Seeks recognition that for many tourists the first approach to the City is from the Marina and interconnectivity with the city centre is important. - Favours the creation, over time, of a designated walkway / ‘visual avenue’/extension of the River Ness walkway leading to the Marina area. 	<p>Support noted.</p> <p>Noted – no change: tourists and visitors travel to Inverness by a wide variety of modes, all of which are important but do not necessarily require to be referenced in the Brief.</p> <p>Accepted: new Para 6.10 highlights the potential for a new mixed use neighbourhood to be created between Longman Road and the riverside (indicated on the strategy diagram relocated to the inside front cover of the finalised Brief), including the opportunity to extend the riverside as an attractive walking and cycling corridor.</p>
<u>Inverness BID</u> <ul style="list-style-type: none"> - Supports extending the city centre visitor experience. Increasing the number of independent outlets in the Old Town should be a priority. 	Support noted. The priorities set out in the Brief seek to maximise existing assets and attractions of the Old Town and the Victorian Market. The Brief cannot identify, however, which retailers should be based there.
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust</u> <ul style="list-style-type: none"> - Supports proposals to make the Northern Meeting Park more accessible. 	Support noted.
Comments from individuals	
<ul style="list-style-type: none"> • Agrees with priorities. • Concern that expanded use of Northern Meeting Park must not conflict with sporting interest –need to maintain a smooth grass surface for cricket. • Noise concerns raised over (a) use of Northern Meeting Park as a music venue and (b) city centre buskers. 	<p>Support noted.</p> <p>Noted – no change: as stated in Section 4, Action 8, the Brief seeks to widen access to the Northern Meeting Park but does not seek to diminish its use for sporting activity.</p> <p>No change: criteria V2 of the Brief makes provision to ensure residential amenity is respected and therefore 24/7 activity proposals require assessment on a case by case basis. Residential amenity is further protected under HwLDP 72: Pollution.</p>

Question 6: *Do you agree with these development criteria? Tell us why.*

10 respondents	
Summary of comments received	Proposed response
<u>Crown City Centre Community Council</u> <ul style="list-style-type: none"> Supports the proposed criteria. Strongly supports the re-use of Inverness castle for cultural and visitor experience. 	Support noted.
Government/Statutory Bodies	
<u>SEPA</u> <ul style="list-style-type: none"> Supports Action 7 relating to the river trail, which should also cross reference to other local travel options such as the Great Glen Way and Coastal Trail. Refer to protecting the riverside environment in Development Criterion V5. 	<p>Support noted – no change: the scope of the project to map and signpost the river digitally and physically has already been finalised as part of the River Ness Flood Alleviation Scheme Public Art Project.</p> <p>Accepted: Criterion V5 text amended.</p>
Business	
<u>Port of Inverness (POI)</u> <u>Inverness Marina</u> <ul style="list-style-type: none"> Supports Development Criteria V4 and V5. Brief should not overlook contribution that improved connectivity along the river frontage will make to timeous delivery of leisure and visitor facilities outwith the city centre boundary. 	Support noted. Para 6.10 has been added to highlight importance of destinations within walking and distance of the city centre and potential to extend riverside walkway in the longer term.
<u>Graham + Sibbald</u> <ul style="list-style-type: none"> The promotion of 24 hour City Centre activity and living is encouraging. 	Support noted.
NGOs (including charities and campaign groups)	
<u>Living Streets</u> <ul style="list-style-type: none"> (Map 4.1) Clarity sought over hatching along the riverside/ terminology/legend. (V5) Concerns raised that more active frontages and spill out space will impact adversely on active travel. 	<p>Noted – no change: graphics have been selected to ensure map is fit for purpose as a Development Management tool.</p> <p>Accepted: Criteria V5 amended.</p>
<u>Theatres Trust</u> <i>Recommends additional criterion: 'The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise key town centre locations and the public realm.'</i>	Noted: Action 10 (Events industry) amended to confirm that partnership-activity will also promote temporary use of buildings and sites by creative, cultural and community organisations.
Comments from individuals	
<ul style="list-style-type: none"> Agrees with proposed criteria. Agrees with proposed criteria but riverside activities should be extended north and 	<p>Support noted.</p> <p>Support noted - no change: the Brief sets priorities and criteria for development</p>

<p>south, including enhanced connectivity/links to the Marina.</p> <ul style="list-style-type: none"> - Reservation expressed for 24/7 city centre activity - neighbourhood residential amenity is paramount. Parents' jobs should not extend into the small hours. 	<p>within the boundary of the city centre as agreed through the IMFLDP.</p> <p>Noted. Criteria V2 of the Brief makes provision to ensure residential amenity is respected and, as a result, 24/7 activity proposals will require assessment on a case by case basis.</p>
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Question 7: Do you have any other comments on making Inverness a great place to visit? Please reference the section/paragraph number where appropriate.

17 respondents

Summary of comments received	Proposed response
Community Councils	
<p><u>Crown City Centre Community Council</u></p> <ul style="list-style-type: none"> - Supports the actions set out and particularly, the need for better signposting. 	Support noted.
<p><u>Port of Inverness</u> <u>Inverness Marina</u></p> <ul style="list-style-type: none"> - Changes sought to widen the scope of the schematic plans to demonstrate the importance of interconnectivity to visitor attractions/destinations beyond the city centre boundary. 	Noted – no change: The purpose of these maps and diagrams is to guide, enable and inform development and investment in the Brief area. Para 6.7 has, however, been added to highlight importance of destinations within walking and distance of the city centre and potential to extend riverside walkway in the longer term.
Government/Statutory Bodies	
<p><u>Sportscotland</u></p> <ul style="list-style-type: none"> - Conditionally supports the Northern Meeting Park being used for increased outdoor leisure/recreational activity providing the quality of the existing sports provision is not adversely affected or enhanced. - Confirms interest in engaging in dialogue on nature of increased activity, including advice. 	<p>Conditional support noted.</p> <p>Offer noted.</p>
Business	
<p><u>Carplus Bikeplus</u></p> <ul style="list-style-type: none"> - Visitors arriving by bus or train can make use of bike-share bikes to make the most of their time in the city. 	Noted.
NGOs (including charities and campaign groups)	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Give further consideration to providing canopies / arcades in the Old Town to provide year-round protection from the elements. 	Noted – no change. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, and taking into account the Old Town's Conservation Area status.

<ul style="list-style-type: none"> - Favours creating a piazza above the existing car park at the rear of the Mercure Hotel overlooking the river, with steps to Bank Street. - Considers that gardens in front of the UHI HQ should be open to the public. - Longman landfill site should be development as a leisure area. 	<p>Noted – no change. The merit of such a proposal would need to be assessed against the policies of the development Plan, including this Brief.</p> <p>Noted – no change: this area is located out with the city centre boundary and is not therefore shown on Map 4.1.</p> <p>No change: Comment unrelated to the Brief area.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - Additional conveniently placed, high quality cycle parking and bike hire sought throughout the city centre, which must not interfere with pedestrian movement, in particular disabled people. 	<p>Accepted: Section 6, Action 8 amended to refer to bike share and bike hire. New Action 9 added to promote increased levels of high quality cycle parking. Development Criterion A2 expanded to confirm requirement for cycle parking in new development. Placemaking Principle 11 sets a requirement for appropriate levels of safe, secure cycle parking.</p>
<p><u>Theatres Trust</u></p> <ul style="list-style-type: none"> - (Section 4) Seeks further recognition for Eden Court Theatre as the largest arts centre in the Highlands. 	<p>Accepted: Paragraph 4.1 amended to highlight the scale and importance of Eden Court as a regional arts centre reinforcing its identity, on Map 4.1, as a key visitor attraction.</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> • Comfortable public seating/benches and toilet facilities are required throughout the city centre. Recent stools installed on the river front should be replaced by comfortable benches. • THC should persuade The National Trust for Scotland to open up Balnain House to the public. • Request for a live digital form of 'camera obscura' be also installed in the castle tower for people with mobility problems. • Northern Meeting Park: noise concerns raised over Park's use as a music venue, and widening use must not affect cricket playing surface. 	<p>No change: there are currently no plans to increase the number of public toilets in the city centre. Placemaking Principle 12 sets requirements for public realm design to include a varied range of well-designed seating that provides for people of all ages and abilities.</p> <p>No change: in September 2017, in response to a recent written query from the Council Leader, the NTS Chief Executive confirmed the Trust's intention to retain the current use of Balnain House (BH) as offices for the Trust and tenants.</p> <p>Noted – no change. Setting specific equipment requirements for Council-owned tourist attractions is outwith the scope of the Brief.</p> <p>No change – Criteria V2 of the Brief makes provision to ensure residential amenity is respected and therefore 24/7 activity proposals require assessment on a case by case basis. Residential amenity is further protected under HwLDP 72: Pollution.</p>

<ul style="list-style-type: none"> • Better quality retailers sought, such as John Lewis / Ikea. • The art gallery, museum and clan centre should be housed in separate buildings, with a strong focus on commercial activity/merchandising. • Various tourism uses/exhibits suggested for the Castle; • Street furniture should comprise of: a fountain; Highland cattle; Gaelic symbol of peace; flying geese; Bonnie Prince Charlie; more park benches. • Detailed suggestions for new visitor/retail attractions include: transformation of Station Square into a 3-storey shopping complex; transformation of Farraline Park into a science park or piazza with public art; merge the bus station and railway station into one with upper floor business / retail space / tourist information centre with removal of the entrance to Academy street and alternative taxi rank and parking provision: overclad Rose Street car park; convert Library to Clan Centre; move Library to expanded Spectrum Centre; transform Midmills building into a museum. 	<p>Noted – no change: the process of selecting or attracting specific retailers to the city is outwith the remit of this Brief.</p> <p>Suggestions noted – no change. Opportunities that arise in the longer term to develop a range of visitor attractions across the city centre are already supported in principle by the Brief. The current priority, however, is to enable the transformation of Inverness Castle into significant new visitor/cultural attraction with funding from the City-Region Deal.</p> <p>Suggestions noted - no change. The Brief reiterates existing policy on public art, as detailed in the Council’s Supplementary Guidance Public Art Strategy adopted in April 2013.</p> <p>Suggestions noted – no change: the Brief prioritises opportunities and interventions understood to be feasible and deliverable in the context of anticipated public and private sector investment. The following interventions are not considered practical or feasible: relocation of Inverness Bus Station and/or its integration with the Railway station; re-development of Farraline Park; re-location of the Library to the Spectrum Centre. The transformation of Station Square into a shopping complex is at odds with built heritage and placemaking priorities set out in Appendix A, Site 1 including a need to “improve the setting of Station Square, reinstating it as a significant civic space”. To support a flexible pattern of development, the Brief does set prescriptive tourism uses for particular sites / buildings. Instead Development Criterion D1 supports sensitive development of sites with underused or neglected heritage assets for a wide range of uses.</p>
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A Great Place to Live	
Question 8: <i>Are these the right priorities to make the city centre a great place to live? Tell us why.</i>	
9 respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council (CCCC)</u> – Very strong support to foster new and refurbished residential uses in the centre;	Support noted.

<ul style="list-style-type: none"> - Supports proposed HMO restrictions based on bed spaces; - Endorses encouragement /relaxations in affordable housing and parking provision. 	
Government/Statutory Bodies	
<u>SEPA</u> <ul style="list-style-type: none"> - Content with priorities; - Map 5.1. should feature important green space shown in Map 4.1, 6.1 and 7.1.to highlight its important role in making the city centre a great place to live. 	Support noted. Accepted: Greenspace added to Map 5.1.
Business	
Graham + Sibbald <ul style="list-style-type: none"> - In favour of encouraging more people to live in the city centre, and opportunities to develop redundant sites for residential conversion. 	Support noted.
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust</u> <ul style="list-style-type: none"> - Supports encouraging residential accommodation back to the city centre. 	Support noted.
<u>Living Streets</u> <ul style="list-style-type: none"> - (Map 5.1) Greenspace should feature, as shown on Maps 4.1, 6.1 and 7.1. 	Accepted: Greenspace added to Map 5.1.
Comments from individuals	
<ul style="list-style-type: none"> • Agrees with priorities, which seem comprehensive. • Disagrees with new use for Midmills campus (artist hub and elderly accommodation) with preference expressed for use as a networked museum building linked to the University of the Highlands and Islands. • Support for proposed flats at Rose Street, and at Glebe Street subject to underground parking provision. • Supports measures to enable more people to live in the city centre but emphasises need to consider noise and disturbance from commercial premises. 	Support noted. No change: the proposed uses have already been granted planning permission (16/02417/FUL). Support noted. Parking requirements for the city centre are set out at Table 8.1 and Criterion A 6, both setting out circumstances where reduced levels of parking may be acceptable. No change – residential amenity protected under HwLDP 72: Pollution. Criteria V2 of the Brief makes provision to ensure residential amenity is respected.

Question 9: Do you agree with these development criteria? Tell us why.	
4 respondents	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	

<u>Inverness Civic Trust</u>	
– Accepts need to relax the 25% affordable housing requirement.	Support noted.
Business	
<u>Inverness BID</u>	
– Supports cap on HMO bed spaces within the red line boundary of Map 5.2; – Supports exemption from Affordable Housing provision where development brings vacant upper floors back to residential use. Considers building regulations should be relaxed to incentivise developers to do so.	Support noted. Support noted – no change: it is not in the Council’s gift to enable relaxation of national regulations (Building Standards). Instead, Para 1.18 signposts the Council’s Pre-Application Advice Service, offering applicants further planning and building regulation advice.
<u>Graham + Sibbald</u>	
– Supports measures to bring upper floors back to residential use, including relaxed relaxing parking and affordable housing provision, and grant funding. – Suggests affordable housing exemption should be extended to all residential development in the city centre, to stimulate housing investment.	Support noted. No change: The proposed exemption has been put in place to encourage developers to prioritise bringing vacant upper floors back to active use.
Comments from individuals	
• Agrees with criteria	Support noted.
• Would welcome reference to the Supplementary Guidance on Sustainable Design.	No change: As an adopted item of Supplementary Guidance, the Sustainable Design Guide can and will be referenced for any development proposal without the need for explicit signposting in this Brief. New Para 2.5 has been added to emphasise opportunities for energy efficiency and low carbon heat technologies.

Question 10: Do you have any other comments on making Inverness a great place to live? Please reference the section/paragraph number where appropriate.	
3 respondents	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust</u>	
– Housing should be sustainable so should not necessarily involve new house building.	Support noted for Brief’s promotion of appropriate re-use of existing buildings/space.
Comments from individuals	
• Greater attention to investment decisions on transport and access is critical to improving the experience of city centre living.	Noted – no change. The Brief actively supports and promotes investment in active travel and transport infrastructure.
• Allowing the prominent site at Glebe Street to lie vacant and un-developed for too	Noted – no change. While a Local Authority has CPO powers, this Brief is not the

long has significant negative economic and environmental impacts. The Council should either impose penalties that force developer to commence work, or acquire site through compulsory purchase for alternative use.	appropriate instrument to set out where these powers will be utilised. The Glebe Street site benefits from an extant planning permission that is yet to be implemented. Under these circumstances it is not considered appropriate to make use of compulsory purchase. Nor has the Council any power to impose requirements on the commencement of work.
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6) Accessible, Easy And Safe To Move Around

Question 11: Are these the right priorities to make the city centre accessible, easy and safe to move around? Tell us why.
13 respondents

Summary of comments received	Proposed response
Seven respondents agreed or broadly agreed with the proposed priority – as noted below.	Agreement noted

Community Councils

<u>Crown City Centre Community Council</u> Supports much of the statements, but much needs to be done to make this effective through specific proposals.	Support noted.
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Government/Statutory Bodies

<p><u>SEPA</u></p> <ul style="list-style-type: none"> – Supports the proposals in Map 6.1 for improvements to active travel routes. – The Brief must acknowledge that, due to high levels of nitrogen dioxide from vehicles, the junction of Academy Street and Queensgate is the Highland’s only air quality management area. The Brief should implement, as far as possible, relevant actions in the Council’s Air Quality Action Plan. – Section 6.2 should be amended to read: ‘A reduction in traffic should help improve air quality issues in the city centre and combined with an expansion...’ 	<p>Support noted.</p> <p>Accepted: Section 7 (Distinctive and Attractive) amended to include new Para 7.4 and Map 7.4, and new Development Criterion D9, to:</p> <ul style="list-style-type: none"> • Refer to the air quality problem at the junction of Academy Street and Queensgate and illustrate the extent of the Air Quality Management Area (AQMA). • Explain how the Brief complements and will help to deliver some aspects of the Air Quality Action Plan. • Require development proposals to give consideration to potential impact on air quality. <p>Alongside, Highland–wide Local Development Plan (HWLDP) Policies 73 Air Quality and 72 Pollution play an important role in addressing these issues. It is also hoped that any review of the HWLDP will include a new policy on AQMAs, much as Policy 73 set out in the HW2MIR.</p> <p>Accepted: text added to Para 6.1, signposting further information in Para 7.4.</p>
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Business	
<p><u>Stagecoach North Scotland</u> Brief should emphasise the importance of bus travel in bringing people to and from the city centre (3.3M journeys/year) and its potential to reduce traffic. It should also give more consideration to prioritising bus travel and improving its appeal including measures to promote modal shift, reduce traffic congestion and discourage drivers from crossing the city centre.</p>	<p>Development Criterion A4 amended to confirm that, where appropriate, contributions will be sought towards improved connectivity to public transport (as set out in Section 8 Developer Contributions). Re-numbered Para 6.7 amended to emphasise enhanced bus access to Farraline Park via requirement for new street linking Rose Street to the Bus Station, as shown in Appendix A, Site 2 Development Guidelines.</p>
<p><u>Port of Inverness</u> <u>Inverness Marina</u> Brief should recognise and give consideration to creating attractive pedestrian, cycle and public transport links to and from the city centre to surrounding areas (including Inverness Port and Inverness Marina) because the visitor experience does not begin or end in the city centre.</p>	<p>Accepted: Section 4, Para 4.1 revised to highlight importance of visitor attractions within walking and distance of the city centre. Section 6, Para 6.10 added to acknowledge opportunity to extend the riverside as an attractive walking and cycling corridor and refer to wider destinations/attractions, including National Cycle Route 1 which passes the Port/Marina.</p>
NGOs (including charities and campaign groups)	
<p><u>Inverness Civic Trust:</u> Favours increased pedestrianisation, utilising the concept of shared space, as a means of unifying the city centre.</p>	<p>No change: In keeping with Scottish Government guidance on street design, the Brief is focussed on making streets and spaces 'better people places' for all users, rather than just movement spaces dominated by vehicle traffic. Shared space is one of several forms of design and management that can achieve this, but can also be perceived as risky by some disabled people. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p>
<p><u>Highland Cycle Campaign:</u></p> <ul style="list-style-type: none"> - (Para 6.1) Queries assumption that Westlink will reduce city centre traffic. - Brief should demonstrate how a car-light city centre will be achieved – including effective integration of all transport modes, a greatly expanded bus service, removal/restriction of private car use in the city centre, and parking enforcement. 	<p>Accepted: Para 6.1 amended to confirm that the Council will monitor and report on the impact of West Link on both motorised and non-motorised travel patterns, comparing predicted and actual effects of the development.</p> <p>Noted - no change: it is not within the Brief's remit to present detailed proposals for controlling modal shift. Instead, its role is to set priorities and criteria for Development Management that target resources and investment in key outcomes, including improvements to infrastructure for walking, cycling and public transport use. In doing so, the Brief accords with the principle of supporting patterns of development that reduce the need to travel (Scottish Planning Policy) and the National Transport Strategy's travel hierarchy, which promotes walking, cycling,</p>

<ul style="list-style-type: none"> - (Para 6.2) Highlights “non-existence” of safe, segregated cycling routes in the city. Inaccurate reference to “off-road” cycle route between Falcon Square and Inverness Campus should be corrected. - Puts forward detailed design standards for new/existing segregated cycling routes, including crossings, contraflows, and restricted use of shared-use paths. 	<p>public transport and car sharing in preference to single occupancy car use.</p> <p>Accepted: Renumbered Para 6.3 corrected.</p> <p>Noted: Development criterion A2 has been amended to require development to follow Transport Scotland guidance, Cycling by Design 2010 (Revision 1, June 2011). Modifications to existing infrastructure are operational matters that do not fall the remit of this Brief. Proposals put forward have been brought to the attention of the Council’s Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland’s Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p>
<p><u>Living Streets:</u></p> <ul style="list-style-type: none"> - Provides detailed critique of Map 6.1, querying absence or accuracy of information about Core Paths, National Cycle Routes, Long Distance Routes, public transport, important greenspace and car parks. - (Para 6.4) Queries assumption that recent investment in the public realm has improved the pedestrian environment on Huntly Street. - Requests removal of all existing shared space and shared-use paths. - Puts forward 18 detailed proposals to improve the walking and cycling environment on Millburn Road, Academy Street, Chapel Street, Huntly Street, Ness Walk, Ness Walk Promenade, and Ness Walk to South of Bishops Road. - (Para 6.2) Inaccurate reference to “off-road” cycle route between Falcon Square 	<p>Suggested modifications have been considered and, where relevant and appropriate, incorporated into a revised map that is fit for purpose as a Development Management tool, taking steps to avoid information-overload.</p> <p>Noted.</p> <p>No change: proposed modifications to existing/recently introduced infrastructure are operational matters that do not fall within the remit of this Brief.</p> <p>Noted – no-change: setting prescriptive, site specific proposals to modify existing infrastructure is outwith the remit of this Brief. Instead these proposals have been brought to the attention of the Council’s Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland’s Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p> <p>Accepted: Re-numbered Para 6.3 corrected.</p>

<p>and Inverness Campus should be corrected.</p> <p>Comments from individuals</p> <ul style="list-style-type: none"> - Re-configure, re-design and integrate the bus and rail stations, including a rail shuttle service to Beechwood. - Develop park-and-ride facilities serving East Inverness and/or Raigmore Hospital. - Introduce measures to discourage private car use. - Commit to a city-wide network of designated, off-road or segregated active travel routes. - To achieve safe walking and safe cycling routes, pedestrians and cyclists need to be kept apart. - Shared use paths are a last resort. - (Para 6.1) What evidence exists that Westlink will reduce city centre traffic congestion? - (Map 6.1) Roundabouts on A82 should be included in priority routes for improvements to active travel. 	<p>No change: while opportunities may arise in the longer term to relocate the bus station, the current priority is to improve Inverness Rail Station, including active travel routes from the Rail Station to the Bus Station and Rose Street Carpark. Whereas it is not within the Brief's remit to prescribe changes to public transport provision, Development Criterion A4 has been amended to confirm that, where appropriate, contributions will be sought towards improved connectivity to public transport (as set out in Section 8 Developer Contributions).</p> <p>No change: A Park-and-Ride facility has been consented as part of the outline planning permission for new development at Stratton, East Inverness and the Council expects this to be delivered as part of this phased development.</p> <p>Noted – no change: The Brief's approach to reducing private car use is focussed on increasing the convenience of walking, cycling and use of public transport. The development criteria are intended to encourage and promote modes of sustainable travel without directly discouraging or dis-incentivising car travel.</p> <p>Renumbered Paras 6.4 and 6.5 updated to refer to recent Scottish Government funding award of £6.6M to deliver city-wide active travel improvements, including a west-east route that crosses the city centre, and grant funding for community engagement, feasibility and design to improve active travel corridors surrounding Inverness Railway Station by March 2018.</p> <p>Accepted: Development criterion A2 amended to require development to follow Transport Scotland guidance Cycling by Design 2010 (Revision 1, June 2011), which identifies factors to be considered in determining whether shared use or segregated facilities are desirable.</p> <p>Para 6.1 amended to confirm that the Council will monitor and report on the impact of West Link on both motorised and non-motorised travel patterns, comparing predicted and actual effects of the development.</p> <p>Noted- no change: As part of the trunk road network the A82 is overseen, managed and maintained by Transport Scotland. Map 6.1 identifies improvements that are</p>
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	within the Council's gift to promote or deliver, including one section of the A82 at Longman Road that abuts important development sites. The Council is committed to ongoing dialogue with Transport Scotland to improve Non-Motorised-User access to the city's trunk road network.
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Question 12: Do you agree with these development criteria? Tell us why.	
11 respondents	
Summary of comments received Two respondents agreed with the proposed criteria.	Support noted.
Community Councils	
<u>Crown City Centre Community Council</u> – (A1) Have designs been put in place to achieve active travel aims? More specific measures are required to promote active cycle use and safer cycle street environments. – (A3) The proposed wayfinding strategy/designs should be circulated for consultation.	Para 6.4 updated to refer to recent Scottish Government funding award of £6.6M to deliver city-wide active travel improvements, including a west-east route that crosses the city centre. Para 6.5 highlights a HITRANS-led study into improving active travel corridors surrounding Inverness Railway Station, involving community engagement, feasibility and design, which will be completed by mid-2018. A Draft Wayfinding Strategy will be issued for public consultation in early 2018, subject to approval by the City of Inverness Area Committee.
Government/Statutory Bodies	
<u>SEPA</u> – Ensure that the impact that any planning applications could have on air quality are fully assessed and proposed mitigation implemented – (A6) should promote and address the need for cycle parking.	Accepted: New Development Criterion D9 (Section 7) requires development proposals to give consideration to potential impact on air quality. Accepted: wording corrected. In addition Criterion A2 expanded to confirm requirement for cycle parking in new development, and Action 9 added to Section 6 promoting increased levels of high quality cycle parking.
Business	
<u>Carplus Bikeplus</u> – (A6) should set a maximum number of parking spaces per dwelling (to encourage alternatives to car ownership).	No change: It is not within the Brief's remit to prescribe detailed parking standards. Criterion A6 promotes a flexible approach to on-site parking provision, incentivising alternatives to car-ownership by providing scope to adjust requirements below Council guidelines where a proposal demonstrates a high level of good quality, non-car accessibility. Alongside, the Draft Developer Contributions Supplementary Guidance

<ul style="list-style-type: none"> - Consider providing secure bike storage instead of parking spaces for new developments. 	<p>approved for consultation by the Council’s Environment, Development and Infrastructure Committee, and the Council’s roads and transport guidelines for new development indicate that lower levels of parking may be acceptable in town and city centres.</p> <p>Accepted: A2 amended to promote secure cycle storage, in keeping with Placemaking Principle 11 - Parking and servicing.</p>
<p>NGOs (including charities and campaign groups)</p>	
<p><u>Inverness Civic Trust:</u></p> <ul style="list-style-type: none"> - There is a need for supported parking for new housing; - (A6) Supports relaxed parking requirements that integrate with a transport policy. 	<p>Support noted.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - Correct criteria to criterion. - - (A2) substitute “disabled people” for “people with reduced mobility”. - (A5) Queries why Brief lacks similar criterion for development at Inverness Bus Station. - (A6) Should prohibit on-street parking. Parking restrictions should be strictly enforced. 	<p>Accepted: Typo corrected.</p> <p>Accepted: wording corrected.</p> <p>No change: while opportunities may arise in the longer term to relocate the bus station, the current priority is to improve the Inverness Rail Station, including active travel routes from the Rail Station to the Bus Station and Rose Street Carpark.</p> <p>No change: The Brief reflects current Council policy/enforcement of city centre parking, including changes agreed by the City of Inverness Area Committee on 14 September 2017, and 3 December 2015.</p>
<p><u>Guide Dogs Scotland</u> (Figure 6.1) Ensure safe segregation of pedestrians and cyclists on proposed 'foot/cycle path'.</p>	<p>Accepted: Development criterion A2 has been amended to require development to follow Transport Scotland guidance Cycling by Design 2010 (Revision 1, June 2011), which identifies factors to be considered in determining whether shared use or segregated facilities are desirable.</p>
<p><u>Living Streets:</u></p> <ul style="list-style-type: none"> - (A2) Requests detailed design standards for active travel routes. Queries whether cycle parking should have good natural surveillance. - (A4) The maximum Developer Contribution for active travel improvements 	<p>Noted. Development criterion A2 has been amended to require development to follow guidance within Cycling by Design 2010 (Revision 1, June 2011). It is not within the Brief’s remit, however, to prescribe detailed design standards for active travel routes. Instead it sets priorities and criteria for development management, while promoting flexibility in detailed design.</p> <p>No change: The Brief reflects current policy on developer contribution levels set out in the</p>

<p>should be quadrupled.</p> <ul style="list-style-type: none"> - (A5) Should make reference to cyclists and disabled access. - (A5) Notes that brief lacks similar criterion for development at Inverness Bus Station. 	<p>Council's Developer Contributions - Supplementary Guidance. A review of this guidance is underway and in November 2017, the Council's Environment, Development and Infrastructure Committee approved a revised draft for public consultation. This comment will be forwarded for consideration through this consultation.</p> <p>Accepted: A5 text amended.</p> <p>No change: While opportunities may arise in the longer term to relocate the bus station, the current priority is to improve Inverness Rail Station, including active travel routes from the Rail Station to the Bus Station and Rose Street Carpark. Maps A.1 and A.3, however, incorporate a proposed route change for buses exiting the bus station, subject to development taking place on adjacent land.</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> • (A1) Should be substantially re-worked to promote a network of designated, off-road active travel routes across the city. • (A5): <ul style="list-style-type: none"> - Should be substantially re-worked to enable major reconfiguration of the rail and bus stations that delivers an integrated transport hub. - Should commit to improving Falcon Square bus stops. • Active travel infrastructure must be built into all new developments and must be a condition of planning permission. 	<p>Map 6.1 (referred to in A1) has been updated to reflect recent Scottish Government funding award of £6.6M to deliver city-wide active travel improvements, including a west-east route that crosses the city centre, and grant funding for community engagement, feasibility and design to improve active travel corridors surrounding Inverness Railway Station by March 2018.</p> <p>No change – while opportunities may arise in the longer term to relocate the bus station, the current priority is to improve Inverness Rail Station, including active travel routes from the Rail Station to the Bus Station and Rose Street Carpark.</p> <p>No change: HITRANS recently replaced the Falcon Square (northbound) bus shelter next to Marks & Spencer and is currently finalising the legal agreement to install a matching shelter to replace and enlarge the existing facility on the opposite side of the road, near the entrance to Eastgate shopping centre, with an expected completion date of early 2018.</p> <p>No change: Development Criterion A2 requires all development to take account of opportunities to promote new or enhanced active travel links.</p>

Question 13: Do you have any other comments on making Inverness accessible, easy and safe to move around? Please reference the section/paragraph number where appropriate.

18 respondents

Summary of comments received	Proposed response
Community Councils	
<p><u>Kiltarlity Community Council</u> Better public transport links to surrounding settlements would increase footfall in the city centre and improve its economy. Declining investment in public transport is preventing people from accessing Inverness for work, leisure and onward travel.</p>	<p>Noted. We acknowledge the role of public transport to/from surrounding settlements in supporting the city centre but the Brief has limited powers to tackle this directly. Development Criterion A4 has been amended to highlight that, where appropriate, contributions will be sought towards promoting use of public transport (as set out in Section 8 Developer Contributions). In addition the Brief confirms that the Council is collaborating with Abellio Scotrail and HITRANS to invest in railway station improvements that promote rail travel as an alternative to private car use.</p>
Business	
<p><u>Inverness BID</u></p> <ul style="list-style-type: none"> - Important to improve access to the city centre for all modes of transport (public transport, active travel and vehicles). Brief needs to demonstrate that all modes can co-exist without conflicting with each other. 	<p>No change - the Brief's priority is to widen the range of choices for people travelling to and through the city centre to achieve a balance between all modes of transport. Experience from other towns and cities shows that this increases footfall and investment, which are key objectives of the Brief. This approach also accords with the principle of supporting patterns of development that reduce the need to travel (Scottish Planning Policy) and the National Transport Strategy's travel hierarchy, which promotes walking, cycling, public transport and car sharing in preference to single occupancy car use.</p>
<p><u>Carplus Bikeplus</u> More measures needed to discourage/reduce car travel such as:</p> <ul style="list-style-type: none"> - Expanding the city's car club/bikeshare network for residents and visitors including provision of car club parking spaces and bikeshare points at key transport hubs (rail/bus). - Reduced admission charges to visitor attractions for people who travel sustainably. - Providing fewer parking spaces and increasing parking charges. 	<p>Noted: The Brief's approach to reducing private car use is focussed on increasing the convenience of walking, cycling and use of public transport. The development criteria are intended to encourage and promote modes of sustainable travel without directly discouraging or dis-incentivising car travel. Section 6, Action 8, has been amended to acknowledge the recent introduction of car club schemes and Council commitment to engage with operators seeking appropriate ways to increase uptake, including monitoring demand.</p> <p>No change: regulating admission charges is outwith the scope of the Brief.</p> <p>No Change: the Brief reflects current Council policy/enforcement of city centre parking, including changes agreed by the City of Inverness Area Committee on 14 September 2017, and 3 December 2015.</p>
<p><u>Port of Inverness</u> <u>Inverness Marina</u></p>	

<ul style="list-style-type: none"> - Supports creation of convenient, attractive pedestrian, cycle and public transport links to city centre destinations. - Requests better connectivity to/from the city centre to the wider area, including development of enhanced parking facilities outwith the city centre to enhance the city centre experience. Examples include a “satellite hub” at the Port/Marina with an attractive walking route to city centre that takes advantage of recent improvements linked to the flood scheme. 	<p>Support noted.</p> <p>Accepted: Section 4, Para 4.1 revised to highlight importance of visitor attractions within walking and distance of the city centre. Section 6, Para 6.10 added to acknowledge potential for a new mixed use neighbourhood to extend the existing riverside walkway to create an attractive walking and cycling corridor.</p>
NGOs (including charities and campaign groups)	
<p><u>Highland Historic Buildings Trust</u></p> <ul style="list-style-type: none"> - Prioritise relocation of bus station and redevelopment of Farraline Park. - Achieve greater integration between the train and bus stations, directing transport away from Academy Street. - Convert Union Street, Queensgate and the foot of Church Street into a pedestrian priority zone. 	<p>No change: while opportunities may arise in the longer term to relocate the bus station, re-develop Farraline Park, and achieve greater integration between bus and rail travel, the Council’s current priority is to promote improvements to Inverness Rail Station and enhance the pedestrian environment between the rail and bus stations, and facilitate active travel improvements on Academy Street, as shown on Map 6.1.</p>
<p><u>Inverness Civic Trust:</u></p> <ul style="list-style-type: none"> - Early public consultation needed to develop an Integrated Transport Strategy for the city centre addressing a vision for traffic and transport management up to 2030, including changes in land use. Areas of conflict between pedestrians, cyclists and other road users should be addressed in an urgent review, involving public consultation, of the Inverness Active Travel Audit. - Cycle/pedestrian routes in the city centre should be clearly demarcated and segregated. - A legible safe, cycling route should be created linking the Millburn cycle route to the Innes Street underpass. The construction of a bridge for active travel from Morrisons supermarket to Railway Terrace should be considered. - Bank Street should be converted to shared space, connecting the city centre to the riverside. 	<p>No change: no change: we agree that transport and travel are important issues for the growth and regeneration of the city centre and Section 6 of Brief highlights priorities for improvements to active travel infrastructure that we are seeking to influence.</p> <p>No change: the design of new or enhanced active travel routes will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all. Modifications to existing infrastructure are operational matters that are outwith the remit of this Brief.</p> <p>Noted- no change: Funding is also in place to undertake community engagement, feasibility and design to improve active travel corridors surrounding Inverness Railway Station by March 2018. The Brief provides in-principle support for these improvements.</p> <p>No change: In keeping with Scottish Government guidance on street design, the Brief is focussed on making streets and spaces ‘better people places’ for all users, rather than</p>

<ul style="list-style-type: none"> - The introduction of “Park and Ride” facilities at Caledonian Thistle Stadium and the Raigmore Interchange should be considered. 	<p>just movement spaces dominated by vehicle traffic. Shared space is one of several forms of design and management that can achieve this, but can also be perceived as risky by some disabled people. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>No change: the city’s first Park-and-Ride facility has been consented as part of the outline planning permission for new development at Stratton, East Inverness and is expected to be delivered as part of this phased development.</p>
<p><u>Highland Senior Citizens Network</u></p> <ul style="list-style-type: none"> - Access for older people must address all disabilities including deafness, visual impairment and reduced mobility; - Improvements should involve direct consultation with disability groups. Ensure clearly marked, safe segregation of pedestrians and cyclists where access is shared. 	<p>Accepted: Criterion A2 corrected to promote safe, attractive routes and spaces for all pedestrians, including disabled people.</p> <p>Noted: Access improvements in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - (Action 1) Substitute “disabled people” for “people with reduced mobility”. - (Action 3) Avoid shared space when promoting safer crossing points for pedestrians and cyclists. - (Action 4) Objects to electric vehicles being linked to sustainable travel. - (Actions 5/6/7) Queries why no investment is planned for Inverness Bus Station because bus travel has more potential to reduce traffic congestion than rail. - (Action 8) Should also promote cycle parking (detailed advice supplied). 	<p>Accepted: wording corrected.</p> <p>No change: The brief does not make specific reference to shared space, which is one of several forms of design and management that can make streets and spaces ‘better people places’ for all users. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>Noted: no change.</p> <p>No change: while opportunities may arise in the longer term to relocate the bus station, the current priority is to improve Inverness Rail Station, including active travel routes from the Rail Station to the Bus Station and Rose Street Carpark.</p> <p>Accepted: Action 9 added to promote cycle parking.</p>
<p><u>Guide Dogs Scotland</u></p> <ul style="list-style-type: none"> - (Action 3) Detailed advice provided on upgrading existing crossings at specific city centre locations to meet the needs people with sight loss 	<p>Noted – no change: modifications to existing infrastructure are operational matters that are outwith the remit of this Brief. This advice has, however, been brought to the</p>

<p>(addressing pole positions, use of tactile paving, and audio /tactile alerts).</p> <ul style="list-style-type: none"> - To protect safety of people with sight loss, kerbs should <u>not</u> be removed to create shared surfaces/spaces. Controlled crossings (e.g from Station Square) should be retained to reduce uncertainty when people with sight loss are crossing roads. - Pavement advertising (A-boards) should be eliminated to make pedestrian movement easier. 	<p>attention of the Council’s Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland’s Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p> <p>Noted – no change. The brief does not make specific reference to shared space, which is one of several forms of design and management that can make streets and spaces ‘better people places’ for all users. Changes to street design and pedestrian crossing points in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>Noted - no change: Council policy on managing obstructions within the adopted road was agreed by the Transport, Environment and Community Services Committee on 15 August 2013. This policy requires businesses to apply for permission to display A-Boards and, if approved, comply with requirements laid out in the guidelines attached to the relevant application form. Council Roads Inspectors are responsible for enforcing this policy.</p>
<p><u>Paths for All</u></p> <ul style="list-style-type: none"> - Brief should support the delivery of the National Walking Strategy and avoid too strong a focus on cycling when promoting active travel. People will choose not to use a car if the Brief encourages people to walk and delivers a good pedestrian environment. 	<p>Noted: The Brief supports the delivery of the National Walking Strategy (NWS) by setting a priority for new development to contribute to making it easy and convenient for people to walk, cycle and use public transport, particularly for short journeys to and through the city centre. The priority set out in Section 6 has been amended to refer to widening the range of choices for “people of all abilities”. This priority accords with the strategic aims of the NWS which are to: create a culture of walking; better walking environments throughout Scotland; ensure easy, convenient independent mobility for all.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Action 1) Substitute “disabled people” for “people with reduced mobility”. - Make special provision for people with impaired vision at all crossings, in particular light controlled crossings. - (Action 3) Puts forward detailed proposals to improve the walking and 	<p>Wording amended.</p> <p>No change: Proposed changes to street design and pedestrian crossing points in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all. Modifications to existing infrastructure are operational matters that are outwith the remit of this Brief.</p> <p>No change: setting prescriptive, site specific proposals to modify existing infrastructure is</p>

<p>cycling environment on Academy Street, Bridge Street, Church Street.</p> <ul style="list-style-type: none"> - Objects to existing public realm changes at the top of Church Street, including disabled ramp to refurbished office building, public art, and café tables and chairs. - (Action 4) Queries meaning of the term “hub”. Approves of introduction of electric taxis. Identifies where electric charging points should /should not be located. - (Action 7) Queries meaning of the term “public realm” and whether improvements to Station Square will destroy existing features. - (Action 8) Objects to allocating on-street space for Car Club parking that could be used for loading. Requests scrapping of existing Car Club scheme. 	<p>outwith the remit of this Brief. These proposals have instead been brought to the attention of the Council’s Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland’s Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>Noted.</p> <p>Action A4 amended to include a definition of an Active Travel Hub.</p> <p>Definition of public realm added to re-numbered Para 1.15.</p> <p>No change: Supporting the development of car clubs in Inverness city centre aligns with Transport Scotland’s <i>Developing Car Clubs in Scotland</i> programme aimed at reducing carbon emissions from transport and improving air quality in towns and cities.</p>
Comments from individuals	
<ul style="list-style-type: none"> • (Action 1) Reword to "pedestrian friendly and cycle friendly" to reflect separate needs. • (Action 3) A82 roundabouts in the city centre should be re-configured to make them safe for cyclists. • (Action 6) Rail Station improvements should go further than generating revenue from additional retail outlets – e.g. Tourist Information Centre should be relocated to the station. • (Action 8) Provide secure, longer term cycle parking, including leased 	<p>Accepted: text amended.</p> <p>No change: as part of the trunk road network, the A82 is overseen, managed and maintained by Transport Scotland. The Brief is focused on improvements that may be in Council’s gift to deliver, subject to the availability of resources linked to new development or grant funding.</p> <p>No change: prescribing the location of the Tourist Information Centre is outwith the scope of this Brief.</p> <p>Accepted: new Action 9 added to promote increased levels of high-quality cycle parking.</p>

<p>parking spaces (for residents without cycle storage/cycle tourists carrying luggage etc).</p> <ul style="list-style-type: none"> • Allow contra-flow movement of cyclists on every one-way street in Inverness. • Convert the entire city centre into a “20’s Plenty” speed zone. • The Brief: <ul style="list-style-type: none"> – lacks concrete proposals to limit or discourage motorised transport; – should be aligned with the National Walking Strategy (NWS) Action Plan; – should address the mobility needs of <u>all</u> disabled people. • Ten existing road crossings should be: <ul style="list-style-type: none"> – upgraded and/or improved to create controlled crossings that are fully accessible to all disabled people (7 locations); or – upgraded to zebra crossing status (3 locations). • City centre footpaths should not double-up as cycle routes. Cyclists should share vehicle routes or be provided with segregated carriageways. All cycle ways should be clearly and frequently marked. Cycle parking should be 'corralled' in areas that are clearly visible. • Existing shared-use cyclist/pedestrian paths should be widened and re- 	<p>No change: proposed changes to street design and cycle movement in the city centre will be approached on a case-by-case basis, informed by public consultation to ensure safe access for all.</p> <p>No change: in July 2017 a 20mph speed limit came into force across a significant portion of Inverness city centre. Other city centre locations may be evaluated, in due course, using criteria for speed reduction measures explained in this report.</p> <p>Noted: The Brief’s approach to reducing private car use is focussed on increasing the convenience of walking, cycling and use of public transport. The development criteria are intended to encourage and promote modes of sustainable travel without directly discouraging or dis-incentivising car travel. It also confirms that Developer Contributions will be secured towards active travel infrastructure. This aligns with the strategic aims of the NWS which are to: create a culture of walking; better walking environments throughout Scotland; and ensure easy, convenient independent mobility for all. The priority set out in Section 6 has been amended to refer to widening the range of choices for “people of all abilities”.</p> <p>Noted – no-change: setting prescriptive, site specific proposals to modify existing infrastructure is outwith the remit of this Brief. These proposals have instead been brought to the attention of the Council’s Area Roads team and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport Scotland’s Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p> <p>Noted: Development criterion A2 has been amended to require development to follow Transport Scotland guidance Cycling by Design 2010 (Revision 1, June 2011), which identifies factors to be considered in determining whether shared use or segregated facilities are desirable. The design and configuration of cycle routes alongside footpaths will need to be considered on a case by case basis.</p> <p>No change: Modifications to existing infrastructure are operational matters that are</p>
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<p>designated as separated routes. All existing street clutter should be removed, (including approx. 200 steel bollards and 70 granite bollards) because it is both an eyesore and a hazard for people who are visually impaired. Consider reducing numbers of public bins.</p> <ul style="list-style-type: none"> On Academy Street, avoid use of “shared space” for vehicle, cycle and pedestrian movement to protect people who are visually impaired. Consider banning pavement advertising (A-boards). 	<p>outwith the remit of this Brief. These suggestions have been brought to the attention of the Council’s Transport Planning and Area Roads teams for consideration as part of any future streetscape proposals.</p> <p>Noted. The brief does not make specific reference to shared space, which is one of several forms of design and management that can make streets and spaces ‘better people places’ for all users. Changes to street design in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of disabled people, to ensure safe access for all.</p> <p>Noted - no change: It is outwith the remit of the Brief Council policy on managing obstructions within the adopted road was agreed by the Transport, Environment and Community Services Committee on 15 August 2013. This policy requires businesses to apply for permission to display A-Boards and, if approved, comply with requirements laid out in the guidelines attached to the relevant application form. Council Roads Inspectors are responsible for enforcing this policy.</p>
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7) Distinctive and Attractive	
Question 14: Are these the right priorities to make the city centre distinctive an attractive? Tell us why.	
10 respondents	
Summary of comments received Seven agreed with one or more of the proposed priorities.	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u> Strongly supports the priority to improve redundant or derelict buildings and endorses action to tackle this problem, such as the Inverness Townscape Heritage project. Acknowledges scale of challenge, particularly in terms of cost and ownership.	Support noted.
Government/Statutory Bodies	
<u>SEPA</u> – (7.1) Requests minor amendment to wording to emphasise the natural environment’s contribution to making the city centre distinctive and attractive.	Accepted: wording amended.
Business	

<p><u>Port of Inverness</u> <u>Inverness Marina</u></p> <ul style="list-style-type: none"> - Support the proposed priorities. - (Para 7.4) Share interest of the public in realising full potential of the River Ness. - Encourage partnership working to extend River Ness walkway from the city centre to the Port/Marina, taking visitors to places of interest including Cromwell's Fort (Clock Tower). 	<p>Support noted.</p> <p>Noted: The Brief's strategy diagram and Maps 3.1 and 5.1 highlight potential for a new mixed use neighbourhood to be created outwith the Brief area (between Burnett Road and the riverside), which should present opportunities for partnership working to extend River Ness walkway.</p>
NGOs (including charities and campaign groups)	
<p><u>Inverness Civic Trust:</u></p> <ul style="list-style-type: none"> - (Para 7.3) Endorses observations on poor pedestrian environment, street character undermined by traffic congestion, unsympathetic alterations /development, and the shortage of public accessible green space /communal open space. - (Para 7.4) Agrees that the City must make full use of the potential of the River Ness and requests an integrated and long term approach. 	<p>Endorsements noted.</p> <p>Agreement noted.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - Queries meaning of the terms "active frontage" and "placemaking principles". - Frontages should not feature pavement cafés or advertising boards because these cause problems for blind people. - Considers the priority to promote innovative solutions for waste storage and collection to be bland and vague. 	<p>Accepted: text amended to explain terms.</p> <p>No change: experience from other towns and cities shows that appropriately located and designed pavement cafés add vibrancy and increase footfall, which are key objectives of the Brief. This approach also accords with Scottish Government guidance on making towns and cities, more active, attractive and accessible, as set out in the Town Centre Toolkit (2015).</p> <p>Noted.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Map 7.1) Queries in detail lack of consistency between this and maps elsewhere in the Brief (site names, numerical order and colours). - Queries whether innovative solutions for waste storage and collection are needed. Questions legality of storing bins in public areas and requests ban, apart from allocated times for waste collection. 	<p>Suggested modifications have been considered and, where relevant and appropriate, incorporated into a revised map that is fit for purpose as a Development Management tool, taking steps to avoid information-overload.</p> <p>Action 6 amended to confirm that in September 2017 the City of Inverness Area Committee approved the launch of a trade waste pilot project to reduce the amount of trade waste containers on the streets and improve the look and feel of the city</p>

	centre. Setting restrictions on the timing of waste collections is outwith the scope of this Brief.
Comments from individuals	
<ul style="list-style-type: none"> Supports priorities to: <ul style="list-style-type: none"> tackle problem city centre waste storage and collection. “preserve” the city’s built heritage. promote high-quality contemporary design that is sympathetic to its context. Objects to replacing built heritage with poorly designed modern buildings. Suggested actions to make the city centre more distinctive and attractive: <ul style="list-style-type: none"> Attract creative businesses to the city centre to increase footfall. Improve approaches to the city centre (e.g. car showroom corridor, Longman Road). Encourage the National Trust for Scotland (NTS) to convert Balnain House into a visitor attraction to expand the range of activities for visitors to the city centre and increase awareness of the river. 	<p>Support noted.</p> <p>No change: Section 7, Placemaking Principle 4 promotes “a high standard of contemporary design that is derived from its context and responds appropriately to the site.”</p> <p>No change: Section 3 (B2) supports development of office, commercial and employment space at locations across the city centre including gap sites and vacant or underused ground or upper floors. It is outwith the Brief’s remit, however, to prescribe what services these businesses should offer.</p> <p>No change: changes to the public realm beyond the city centre boundary is outwith the remit of this Brief. The Council has, however, produced a design guide for new development that impacts on the character and quality of the main public approaches to the city.</p> <p>No change: in September 2017, in response to a written query from the Council Leader, the NTS Chief Executive confirmed the Trust’s intention to retain the current use of Balnain House (BH) as offices for the Trust and tenants. This use is entirely consistent with the priority set out in Section 3 of the Brief to attract public and private sector organisations to locate, remain and expand their workforce in the city centre. The National Trust has installed visitor interpretation panels in BH garden, which is accessible to the public.</p>

Question 15: Do you agree with these development criteria? Tell us why.	
Eleven respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u>	

Supports the proposed criteria. Will take close interest in individual projects as they are developed.	Support noted.
Government/Statutory Bodies	
<u>SEPA</u> – (D8) Rename as “Natural heritage and the environment”. Amend text to: [Development adjacent to, abutting, or within River Ness] “must not result in a reduction in its environmental condition and careful consideration must be given to” [potential impact...].	Accepted: text amended.
Business	
<u>Port of Inverness (POI)</u> <u>Inverness Marina</u> – Brief should acknowledge importance of attracting visitors to destinations beyond, but within walking distance of, the city centre, by means of direct and attractive pedestrian linkages. POI keen to develop this type of destination facility.	Accepted: Section 4, Para 4.1 revised to highlight importance of visitor attractions within walking and distance of the city centre. Para 6.10 added to acknowledge opportunity to extend the existing riverside route as an attractive walking and cycling corridor and refer to wider destinations/attractions, including National Cycle Route 1 which passes the Port/Marina.
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust:</u> – Supports (D1) (D3) and (D5). – (D6) Supports development and adoption of Shopfront Guidance. – Temporary hoardings should be attractive (Inverness Townhouse works set exemplary standard). – (D7) Waste uplift and storage should be properly managed and controlled.	Support noted. Accepted: Placemaking Principle 12 amended to refer to appropriate design of temporary hoardings. New Action 7 added reporting the launch of a trade waste pilot project in January 2018 to reduce the amount of trade waste containers on the streets and improve the look and feel of the city centre, as approved by the City of Inverness Area Committee in September 2017.
<u>Highland Cycle Campaign</u> – Queries option for improving Station Square (as illustrated on Page 33) in terms of how: <ul style="list-style-type: none"> • shared space solution will accommodate safety needs of visually impaired people and guide dogs; • illustrated reduction in motor vehicles will be achieved. 	No change: as its caption explains, this illustration formed part of a previous options study. Changes to the design of streets and spaces in the city centre will be approached on a case-by-case basis, informed by public consultation, including the needs of all street users.
– (D5) Requests clearer wording to ensure public art is integrated into design and	Accepted: text amended to refer to integration of public art into the design of fittings

not delivered as a bolt-on.	and features at an early stage in the design process.
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - Queries why pedestrians and cyclists are not mentioned in criteria. - (D5) Considers good facilities for pedestrians and cyclists to be more important than public art. - (D6) Shopfront Guidance exists that was prepared 15-20 years ago but ignored for previous 10 years. - (D7) Amend text to: <i>[No refuse or recycling material shall be stored or placed for collection on the pavement or public highway except] "between 7am and 10am" [on day of collection].</i> 	<p>No change: pedestrians and cyclists are referred to Section 6 Criteria for Development [Accessible, easy and safe to move around]</p> <p>Noted - no change. The Brief reiterates existing Council policy on public art, as detailed in Supplementary Guidance Public Art Strategy adopted in April 2013.</p> <p>Noted – no change.</p> <p>No change: setting restrictions on the timing of waste collections is outwith the scope of this Brief. Action to reduce the amount of trade waste containers on city streets is already underway following approval by the City of Inverness Area Committee in September 2017 of a trade waste pilot project .</p>
Comments from individuals	
<ul style="list-style-type: none"> • Generally agrees with proposed criteria but: <ul style="list-style-type: none"> ▪ Importance of landscape infrastructure should be emphasised (management/maintenance of mature street trees and riverside trees; future 'greening', in particular Longman Road). ▪ Make reference to important green infrastructure, e.g woodlands at: Tomnahurich; escarpment east of Millburn Road; escarpments around Merlewood/Stratherrick. • (D4) Add Balnain House to list of sites requiring site specific guidance. • Public art is not a priority. 	<p>Support noted.</p> <p>Accepted: Criteria D3 and D8 amended to emphasise importance of safeguarding and enhancing landscape and green infrastructure, including trees.</p> <p>No change: existing Listed Building and Conservation Area legislation, combined with Development Criteria and Placemaking Principles set out in this Brief are considered sufficient to guide any future development at Balnain House. Site-specific guidelines relate to properties/sites that are either: a heritage asset under threat from neglect or demolition; a vacant site; a site where major development is already planned or anticipated that will have a significant impact on the visual and spatial character of the city centre. Balnain House does not fall into any of these categories.</p> <p>Noted - no change. The Brief reiterates existing Council policy on public art, as detailed in Supplementary Guidance Public Art Strategy adopted in April 2013.</p>

<ul style="list-style-type: none"> Development must be fit for purpose and aesthetically pleasing. Contemporary materials must complement existing fabric. Where demolition is necessary, this should be done timeously. 	No change: the Key Placemaking Principles set out in the Brief, along with site-specific guidance for key sites, describe parameters for the visual and spatial character of new development that are material considerations in the determination of planning permissions. It is outwith the Brief's remit to set time limits for demolition.
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Question 16: Do you have any other comments on making Inverness distinctive and attractive? Please reference the section/paragraph number where appropriate.

11 respondents

Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u>	
<ul style="list-style-type: none"> Supports redevelopment and stabilisation of heritage assets to establish viable and supportive uses that maintain their character and distinctiveness. Endorses work of the Townscape Heritage Project to improve Academy Street. Wishes to be consulted on all the major town centre sites as they come forward. 	<p>Support noted. Placemaking Principle 3 amended to emphasise importance of maintaining the character and distinctiveness of heritage assets.</p> <p>Noted.</p> <p>Noted.</p>
Business	
<u>Graham + Sibbald</u>	
<ul style="list-style-type: none"> Endorses the Brief's focus on bringing redundant buildings back into economic use, and its support for adaptive re-use, as means of improving and regenerating the city centre. 	Support noted.
<u>Port of Inverness (POI)</u>	
<u>Inverness Marina</u>	
<ul style="list-style-type: none"> (Para 7.4) endorsed. Brief should also emphasise importance of creating attractive pedestrian links to riverside destinations beyond the Brief boundary, including a visual walkway connecting the city centre to Inverness Marina that enables access to tourist activities such as dolphin watching. 	<p>Support noted.</p> <p>Accepted: Para 6.10 added to (a) highlight importance of destinations within walking and distance of the city centre; (b) confirm that wayfinding proposals will signpost these destinations; and (c) highlight potential for a new mixed use neighbourhood to be created between Burnett Road and the riverside (as indicated on the strategy diagram re-located to the inside front cover of the finalised Brief) including opportunity to create an attractive riverside walkway.</p>
NGOs (including charities and campaign groups)	
<u>Highland Historic Buildings Trust</u>	

<ul style="list-style-type: none"> - Increase publically accessible greenspace in the city centre, including the riverside, e.g. create multi-use spaces and roof top gardens; “green” surroundings of historic buildings and footpath boundaries. - Prioritise protection and enhancement of escarpment and Victorian villas lining Gordon Terrace and Culduthel Road. - Use existing assets and re-develop historic buildings for wider use. - (Map 7.1) Why does this not refer to development of the “Old Town” or potential improvements on Chapel Street? 	<p>Accepted: Placemaking Principles 3 and 14 have been amended to promote opportunities to increase greenspace, including rooftop gardens, planting and “greening”.</p> <p>Accepted: Placemaking Principle 3 amended to emphasise importance of maintaining the character and distinctiveness of heritage assets. Criteria D3 and D8 amended to emphasise importance of safeguarding and enhancing landscape and green infrastructure, including trees.</p> <p>No change: Criterion D1 promotes sensitive re-development of sites with underused or neglected heritage assets.</p> <p>No change: Map shows Old Town Conservation Area Management Plan boundary. Chapel street is not a priority area for public realm improvements but is identified, however, on Map 6.1 as a priority route for active travel improvements in the longer term.</p>
<p><u>Inverness Civic Trust:</u></p> <ul style="list-style-type: none"> - The increase in vacant and dilapidated upper storeys is exacerbated by multiple ownership, and businesses and organisations moving to out-of-town sites. - Consider using Common Good Fund to provide VAT relief on repairs to Listed Buildings. - Take steps to prevent sites/property from lying vacant and creating eyesores. Use enforcement to ensure these areas are maintained, landscaped and made safe. Enforce all planning conditions. - Measure, monitor and address pollution in the city centre. - City taxis should be required to use a recognisable colour and logo to achieve a unified brand. By 2030 only electric or hybrid vehicles should be operating as taxis in the city centre. 	<p>Noted.</p> <p>Noted – no change: this Brief is not the appropriate instrument for the allocation of Common Good Fund resources.</p> <p>Noted – no change: The Council’s powers of enforcement relate to unauthorised development or development that fails to keep to the terms of a planning consent. These are set out in our Planning Enforcement Charter.</p> <p>Accepted: The Council has declared the area surrounding the junction of Academy Street and Queensgate to be an Air Quality Management Area (AQMA) and is continuing to monitor air quality at several locations within and around this zone, including real time monitoring on Queensgate. Section 7, Para 7.4 added to make reference to the AQMA and its related Draft Air Quality Action Plan.</p> <p>No change - branding of city cabs and informing the fuel choice of taxi companies are outwith the scope of this Brief.</p>

<p><u>Living Streets</u></p> <ul style="list-style-type: none"> – Restrict timing of city centre waste collections to hours between 07.00 and 10.00. 	<p>No change: setting restrictions on the timing of waste collections is outwith the scope of this Brief. Action to reduce the amount of trade waste containers on city streets is already underway following approval by the City of Inverness Area Committee in September 2017 of a trade waste pilot project .</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> • Designate Inverness as a “Green City”- or set a timetable to do so. • Move the bus station to the rear of the Library (Royal Mail site) and transform Farraline Park into an urban square. • Re-develop Farraline Park as: a piazza with fountain; a Kyoto Garden; a Jacobite Garden. • Develop A82 as an artery for buses. • New public art could comprise of: a fountain; Highland cattle; Gaelic symbol of peace; flying geese; Bonnie Prince Charlie. • Some public art poses a trip hazard to, for example, visually impaired people (city centre examples identified). Designers and installers should be made to consider hazard implications as part of the process of planning/designing/installing artwork. 	<p>No change - the Brief prioritises opportunities and interventions understood to be feasible and deliverable in the context of anticipated public and private sector investment. Currently, the following interventions are not considered practical or feasible: relocation of Inverness Bus Station; re-development of Farraline Park; achieving “Green City” status; altering the role of the A82.</p> <p>Noted.</p> <p>Accepted. Placemaking Principle 12 amended to require public realm design, including public art, to have regard for the needs of disabled people, ensuring safe access for all.</p>

<p>Question 17: Do you agree with the proposed placemaking principles for assessing development proposals? Tell us why and which principle you are commenting on.</p>	
<p>Ten respondents</p>	
<p>Summary of comments received</p>	<p>Proposed response</p>
<p>Government/Statutory Bodies</p>	
<p><u>SEPA</u></p> <ul style="list-style-type: none"> – (Principle 13) Requests addition to text to end of first paragraph: “Any opportunity should be taken to use new open spaces to retrofit well designed SUDS into the local drainage network.” 	<p>Accepted: text amended.</p>
<p><u>Historic Environment Scotland</u></p> <ul style="list-style-type: none"> – Agrees with proposed principles, in particular (Principle 3) Historic Buildings and Spaces. – (Principle 3) should refer also to safeguarding the setting of built heritage. 	<p>Support noted.</p> <p>Accepted: text amended.</p>
<p>Business</p>	

<p><u>Carplus Bikeplus</u> (Principle 11) Make Car Club vehicle parking bays visible, easy and safe to access.</p>	<p>Accepted: text amended.</p>
<p>NGOs (including charities and campaign groups)</p>	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - (Principle 1) A computer-generated 3-D model of the city centre should be prepared (with assistance from UHI?) to enable planning applicants develop and integrate their designs into the wider context. - (Principle 2) Planning consent for any development should protect views from five key points: Castle Hill; Inverness Castle; Bridge Street; Castle Street and Raining's Stairs. - (Principle 3) Paras 1- 4 are endorsed. Request for clarification in para 5 of whether future management/maintenance plans relate to the heritage asset or the new development. - (Principle 4) Endorses the principle of good design and expresses concern that, currently, this is not upheld by the Council when processing planning applications. - (Principle 9) Too prescriptive. Revised wording proposed. - (Principle 12) Should promote consistency in the use of materials, and an integrated approach to materials and components. 	<p>Noted.</p> <p>Accepted: Re-numbered Map 7.5 revised to show all five points. Principle 2 amended to refer to this map.</p> <p>Endorsement noted. Text amended to clarify that future management/maintenance plans relate to the heritage asset.</p> <p>Noted.</p> <p>Noted – no change: Principle 9 seeks to moderate materials that are not common to the fabric of the Conservation Area by discouraging their <u>widespread</u> use. It does not, however, prescribe or prohibit the use of any material.</p> <p>Accepted: text amended.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - (Principle 11) Should promote cycle parking (detailed advice supplied). - - (Principle 12): Should address needs of visually impaired people by promoting raised kerbs and avoiding the proposed palette of grey stone surfaces. - Queries whether street clutter will be avoided if the Brief also advocates high quality street furniture and lighting. 	<p>Accepted: Development Criterion A2 and Section 6, Action 9 added to place greater emphasis on cycle parking.</p> <p>Accepted: Text amended to require public realm design to have regard for the needs of disabled people, ensuring safe access for all. Materials cited are unchanged because they are merely examples of the character and quality of recent city centre street surfacing.</p> <p>Noted.</p>
<p><u>Living Streets:</u></p> <ul style="list-style-type: none"> - (Principle 10) is so generalised as to be meaningless. 	<p>Noted.</p>

<ul style="list-style-type: none"> – (Principle 11) It is wrong to promote new on-street parking because road space should only accommodate movement or loading. 	<p>No change: The Brief reflects current Council policy on city centre parking and how this is enforced, including changes agreed by the City of Inverness Area Committee on 14 September 2017, and 3 December 2015.</p>
<ul style="list-style-type: none"> – (Principle 11) Explains why Caithness slabs and granite setts make access difficult or dangerous for pedestrians, cyclists or some wheelchair users. 	<p>Noted.</p>
<ul style="list-style-type: none"> – (Principles 13 &14) Queries why recent planning permissions were granted that will reduce green space/trees (Crown Circus; Falcon Square) and whether other greenspace (Ardross Street) faces similar treatment. 	<p>Noted.</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> • Principles seem comprehensive. Brief should describe how, and to what extent, these will be enforced. 	<p>Noted – no change: These principles together with criteria and actions will be enforced through the determination of planning applications. The Council’s powers to enforce action against unauthorised development, or development that fails to keep to the terms of a planning consent, are set out in our Planning Enforcement Charter.</p>
<ul style="list-style-type: none"> • (Principle 9) Use glass or glass cladding to merge contemporary design with existing structures. 	<p>Support noted.</p>
<ul style="list-style-type: none"> • (Principle 12) The promotion of Caithness stone slabs raise safety concerns because they tend to be slippery when wet or icy. 	<p>No change: the Brief cites these materials as examples of the character and quality of recent city centre street surfacing.</p>
<ul style="list-style-type: none"> • (Principle 14) Add guidance on successful establishment of urban trees (supplied). 	<p>Accepted: text amended to incorporate guidance.</p>

<p>Any Other Comments</p>	
<p>Question 18: Do you have any other comments on this document? Please reference section/paragraph number where appropriate.</p>	
<p>Twelve respondents</p>	
<p>Summary of comments received</p>	<p>Proposed response</p>
<p>Community Councils</p>	
<p><u>Kiltarlity Community Council</u> The Brief’s long term vision will not be delivered until problems related to anti-social behaviour in the city centre are resolved.</p>	<p>Noted.</p>
<p>Government/Statutory Bodies</p>	
<p><u>SEPA</u></p>	

<ul style="list-style-type: none"> - (Para 8.3) Requests consideration of reduced levels of developer contributions when additional environmental benefits are provided, such as where “development can provide a demonstrated additional environmental benefit such as an increased provision of open space above the <i>Open Space in Residential Development Supplementary Guidance</i> requirement, or surface water treatment for surrounding development”. - Encourages energy efficiency and low carbon heat technologies for larger scale developments. 	<p>Noted – no change: Developer contributions are required to mitigate specific impacts of development. Since there is no direct correlation between development impact and additional environmental benefit, we consider it would be inappropriate to include this exception. We are, however, committed to review and consider options for reduced levels of developer contributions on a case-by-case basis. For information, in November 2017 the Council’s Environment, Development and Infrastructure Committee approved a revised draft of the <i>Developer Contributions - Supplementary Guidance</i> for public consultation.</p> <p>Accepted: New para 2.5 added to encourage energy efficiency and low carbon heat technologies.</p>
<p><u>Historic Environment Scotland</u></p> <ul style="list-style-type: none"> - Welcomes draft Brief’s recognition of potential for historic buildings and sites to contribute to city centre’s prosperity and residential/tourist amenity. - Confirms interest in maintaining dialogue with the Council on bringing redundant historic buildings back to active use or improving their setting. - Notes that development guidelines are consistent with recent HES advice on various city centre initiatives, while opportunity taken to add further detailed comment in this response. 	<p>Support noted.</p> <p>Interest noted.</p> <p>Support noted.</p>
<p>Business</p>	
<p><u>Inverness BID</u></p> <p>Inverness Business Improvement District welcomes Brief as an important opportunity to assist the future planning and encourage investment and development in the city centre.</p>	<p>Support noted.</p>
<p><u>Graham + Sibbald</u></p> <ul style="list-style-type: none"> - Welcomes acknowledgement that derelict/brownfield sites can be challenging to develop. - Agrees with flexible approach to developer contributions because this could improve viability of development on difficult sites. 	<p>Support noted.</p> <p>Support noted.</p>
<p><u>Port of Inverness (POI)</u></p> <p><u>Inverness Marina</u></p> <p>Welcomes initiatives that help deliver a vibrant and attractive City and confirms POI’s commitment to diversifying, improving and developing its facilities to increase visitor numbers.</p> <p>Support terms of Brief but seeks assurance that vision for expansion and enhancement will acknowledge potential for development outwith the Brief</p>	<p>Support noted.</p> <p>Support noted. Para 6.10 added to highlight important potential for destinations within walking and distance of the city centre to contribute to its diversity and</p>

boundary to make a positive contribution to the diversity and vibrancy of the city centre.	vibrancy.
NGOs (including charities and campaign groups)	
<p><u>Highland Historic Buildings Trust</u> Improvements suggested at Chapel Street are not included on Map 7.1.</p> <p>Development of the "old town" is referred to the text but not on the map. Existing heritage assets should be used and historic buildings developed for wider use.</p>	<p>No change - Map 6.1 indicates longer term commitment to active travel improvements on Chapel Street.</p> <p>No change – Map 4.1 identifies Old Town as a heritage asset with potential for improved branding as a heritage attraction. Criterion D1 confirms support for sensitive re-development of all city centre sites with underused or neglected heritage assets.</p>
<p><u>Inverness Civic Trust:</u></p> <ul style="list-style-type: none"> - The Brief is extremely important to the development, enhancement and regeneration of Inverness City centre; - The 25 year vision for the city centre should be bold, imaginative and constructive. - (Para 1.8) Add fourth criterion: ‘To promote a vibrant mixed economy, both commercial and residential’ promoting the city centre as an area where people live, work and visit, and where small businesses can flourish. - An integrated transport strategy is needed and will impact on nearly every aspect of the Brief. A review and public consultation of the Active Travel Audit should take place before the Brief is finalised. - Re-development of the Castle/Castle Hill must include Upper and Lower Bridge Street. - Provision of public open space is paramount and should include green space/piazas at Falcon Square, Farraline Park, Station Square, and the Mercure Hotel Car Park. 	<p>Support noted.</p> <p>Noted.</p> <p>Accepted - but suggested text has been added to Para 2.4 because Para 1.8 is a record of feedback from a previous public consultation held in April 2014.</p> <p>Noted – no change: we agree that transport is an important issue for the growth and regeneration of the city centre and Section 6 of Brief highlights priorities for improvements to active travel infrastructure that we are seeking to influence. A review of the Active Travel Audit is not considered to be a prerequisite to finalising the Brief.</p> <p>Noted: It is not within the Council’s gift to insist that adjacent landholdings are developed simultaneously. The introduction to Site-Specific Development Guidelines for Site 6 (Bridge Street) has been expanded, however, to encourage prospective developers to assess opportunities for wider land assembly that would enable development to be more in keeping with the historic setting.</p> <p>No change: the Brief promotes a flexible approach to the provision/ re-development of public open space. Placemaking Principle 13 seeks to increase or enhance opens space wherever possible. Site Specific development guidance for Site 1: Inverness Rail Station sets parameters for the re-development design of Station Square to</p>

<ul style="list-style-type: none"> - The Council should relocate its headquarters to the former site of Inverness College. 	<p>accommodate a complex range of stakeholder needs and landownership/tenure. Guidance for Site 2: Royal Mail promotes public realm improvements, including tree planting, on the eastern edge of Farraline Park. Changes to Falcon Square were recently approved as a condition of planning permission for development surrounding the Square. It is outwith the remit of this Brief to require the Mercure Hotel to convert its car park into greenspace.</p> <p>Noted.</p>
<p><u>Highland Cycle Campaign</u></p> <ul style="list-style-type: none"> - The Brief exhibits vague ambition, many vacuous unfounded statements/factual mistakes and some useful goals. - Surprised how few people were aware of this public consultation. Questions Council’s preference for consultation feedback to be submitted online because: <ul style="list-style-type: none"> • Brief content is complex and difficult to read; • Online consultation portal is cumbersome and unreliable; • Feedback requires access to an internet connected computer, and basic ability to use one. 	<p>Noted.</p> <p>Noted. The consultation was widely publicised in a number of ways including social media, press notices, posters in libraries and service points, hand delivery of flyers to over 500 local businesses, and email contact with stakeholders, agencies, businesses and individuals who has previously expressed an interest in city centre regeneration. In addition, two public drop-in events were held in the Eastgate Shopping Centre and the Town House.</p> <p>Although Page 3 of the Draft Brief confirmed the Council’s commitment to accepting consultation comments by letter or email (if agreed in advance with a member of the Development Plans team) 80% of respondents submitted feedback online, reinforcing a growing trend for increased use of the Council’s consultation portal. Although it is not possible to calculate the exact number of people who accessed the consultation webpages, Google Analytics shows that the online version of the Draft Brief received over 300 unique visits during the consultation period.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - The Council is wrong to force the public to use the internet to submit consultation responses. - Developer Contributions should be quadrupled to enable delivery of required facilities. 	<p>Noted. Page 1 of the Draft Brief confirms that Development Plans will accept comments by letter or email if a respondent agrees this in advance with a member of the team.</p> <p>No change: The Brief reflects current policy on developer contribution levels set out in the Council’s Developer Contributions - Supplementary Guidance. A review of this guidance is underway and it is anticipated that approval will be sought from the Environment, Development and Infrastructure Committee on 8 November 2017 to</p>

<ul style="list-style-type: none"> - Provide a glossary for specific phrases. - Remedy inconsistencies in mapping – particularly inconsistent use of colour/graphic styles. - Remove repetition, e.g. references to public art, waste management, and guidelines for submitting consultation feedback. 	<p>publish a revised draft for public consultation.</p> <p>Accepted: text amended in various locations to include definitions for specific phrases.</p> <p>Map colours and graphic styles have been considered and, where relevant and appropriate, adjusted to meet the requirements of a Development Management tool.</p> <p>Noted – no change. Repetition has been necessary in some instances to facilitate the Development Management process where, for example, public art and waste management feature in both development criteria and placemaking principles.</p>
Comments from individuals	
<ul style="list-style-type: none"> • (Section 8) The range of Developer Contributions seems comprehensive but should be accompanied a statement describing how, and to what extent, developer requirements will be enforced and monitored. 	<p>No change: procedure for monitoring and enforcing developer requirements is set out in the Council's Developer Contributions - Supplementary Guidance.</p>

Appendix A: Site Specific Development Guidance	
STATION QUARTER	
Site 1: Inverness Rail Station	
Question 19: Tell us what you think about the development guidance for Site 1: Inverness Rail Station.	
Five respondents	
Summary of comments received	Proposed response
Business	
<p><u>Carplus Bikeplus</u></p> <ul style="list-style-type: none"> - Identify Car Club vehicle parking spaces at convenient points for rail-travellers. - Ensure bike-share bikes are prominently displayed and easy to access from the station. - Encourage through-ticketing of rail travel with bikeshare/car club. 	<p>Accepted: Site 1 Guideline 4.f added to encourage convenient siting of car-share and bike-share parking.</p> <p>Noted - no change: regulating through-ticketing of rail travel is outwith the remit of this Brief.</p>
NGOs (including charities and campaign groups)	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Supports proposal to improve Strothers Lane and Falcon Square entrances to increase pedestrian and cycle access. - Emphasises the importance of the Station Square as a gateway to the city. 	<p>Support noted.</p> <p>Noted.</p>

<ul style="list-style-type: none"> - The Brief lacks: <ul style="list-style-type: none"> ▪ recognition of interdependence between Rail Station, Royal Mail and Victorian Market ▪ a comprehensive vision and masterplan for the area. - Current proposals lack vision and boldness – e.g. potential to expand Station Square by pushing the station further east. Vehicular access should be restricted to disabled and taxi pickup/drop off. Taxi ranks should be relocated behind and to the side of the Rail Station. - (Map A.2) Masterplan should show connectivity to Falcon Square, which should be developed further as public open space. - (5) Seeks welcoming and versatile open spaces with strong pedestrian links (e.g. Station Square to Academy Street and Victorian Market) using surface treatments, lighting and canopies. 	<p>Noted.</p> <p>No change: the proposed guidelines reflect the scope of improvements that are anticipated to take place as part of the current franchise agreement between Transport Scotland and Abellio Scotrail, which do not include plans to move the railway station. Guideline 4.b sets out the preferred option for access to Station Square, including requested restrictions on vehicle access – all subject to the outcome of negotiations between Network Rail, Abellio Scotrail and relevant stakeholders, including taxi companies.</p> <p>Accepted: Map A.2 amended to emphasise importance of enhanced connectivity to Falcon Square. Attention is drawn to recent granted planning permissions to expand restaurant facilities surrounding Falcon Square, including enhancements to seating, planting and lighting in the square (Application 16/05588/FUL).</p> <p>Accepted: Guideline 5 amended to make reference to suggested improvements. Reference to canopies omitted because this may be at odds with priority to respect and conserve character of the Station’s built heritage, and de-clutter the public realm.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Map A.2) Provides detailed critique making reference to map clarity, extent and use of civic space and impact of recent planning permissions. - Placemaking Priorities: repetition highlighted. - (4) Access etc: Supports requirement for expanded, improved cycle parking that is convenient, weatherproof and secure. - Requests a segregated cycle route for cyclists accessing the station. 	<p>Suggested modifications have been considered and, where relevant and appropriate, incorporated into a revised map that is fit for purpose as a Development Management tool, taking steps to avoid information-overload.</p> <p>Accepted: text corrected to remove repetition.</p> <p>Support noted.</p> <p>No change: prescribing specific requirements for improvements to active travel infrastructure is outwith the remit of this Brief. This request has been brought to the attention of the Council’s Transport Planning and Area Roads teams and, where relevant, will be taken into account as part of two forthcoming projects to develop detailed designs for active travel improvements in the city centre, funded by Transport</p>

<ul style="list-style-type: none"> - Provides detailed advice on reconfiguring taxi waiting, pickup and drop-off. - (5) Public Realm: Favours smooth tarmac over stone slabs/ setts as replacement for existing surfacing to facilitate wheelchair-users. - Restrictions on illegal parking and on-street bin storage should be enforced on public roads. - Feature lighting adds to light pollution and should be avoided. 	<p>Scotland's Community Links and Community Links Plus programmes. Paras 6.4 and 6.5 have been amended to make reference to these projects.</p> <p>No change: prescribing specific arrangements for taxi access is outwith the remit of this Brief and will be subject to negotiation between Network Rail, Abellio Scotrail and taxi companies.</p> <p>Accepted: Re-numbered Guideline 5.b amended to require selection of surface finishes to have regard for all-abilities access.</p> <p>No change: Attention is drawn to current Council policy/enforcement of city centre parking and trade waste agreed by the City of Inverness Area Committee on 14 September 2017 (parking, waste) and 3 December 2015.</p> <p>Noted. Re-numbered Guideline 5.d amended to highlight need to avoid light pollution.</p>
<p>Comments from individuals</p>	
<ul style="list-style-type: none"> • Agreement that: <ul style="list-style-type: none"> ▪ Pedestrian access /safety should be prioritised between the station and (a) Inverness Bus Station and (b) bus stops on Falcon Square; ▪ Pedestrian and cycle links between the rail and bus stations must be redesigned and properly signposted; ▪ Café spill-out space, cycle movement or bollards must not interfere with safe, all abilities access; ▪ A pedestrian crossing is required from Station Square to the Victorian Market; ▪ Vehicle access should be improved and controlled to facilitate safe pick up/drop off and enable replacement buses to turn safely; ▪ Existing station boundary fencing is dark and unwelcoming. • Change title to Inverness "Railway" Station. • (Para 1) Add text: a vital gateway for visitors to the city "and region". • Does Falcon Square entrance provide a sufficiently wide escape route to comply with fire regulations? 	<p>Support noted.</p> <p>Accepted: title amended.</p> <p>Accepted: text added.</p> <p>No change: rail station alterations and improvements, including means of escape, will be required to comply with Building Standards.</p>

<ul style="list-style-type: none"> • Station wayfinding should signpost bus stops in Falcon Square. • Enable Farraline Park to be reclaimed as a civic space by extending or moving Bus Station. • Taxis must not be relocated from front of station/Station Square to Station Lane. • Retain Station Square as a civic space, removing parked cars and providing a convenient taxi drop-off space. 	<p>Noted – no change: this request will be brought to the attention of Abellio Scotrail, which is responsible for station wayfinding.</p> <p>No change: while opportunities may arise in the longer term to relocate the bus station, re-develop Farraline Park, and achieve greater integration between bus and rail travel, the Council’s current priority is to promote improvements to Inverness Rail Station and enhance the pedestrian environment between the rail and bus stations.</p> <p>No change – prescribing specific arrangements for taxi access is outwith the remit of this Brief and will be subject to negotiation between Network Rail, Abellio Scotrail and taxi companies.</p> <p>No change: Map A.2 and Guideline 4.b set out the preferred option for access to Station Square, including its enhancement as an important civic space with improved pedestrian access – all subject to negotiation between Network Rail, Abellio Scotrail and relevant stakeholders, including taxi companies.</p>
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Site 2: Royal Mail Building, Strothers Lane	
Question 20: Tell us what you think about the development guidance for Site 2: Royal Mail, Strothers Lane. Four respondents	
Summary of comments received	Proposed response
Government/Statutory Bodies	
<u>Historic Environment Scotland</u> <ul style="list-style-type: none"> – Welcomes emphasis on enhancing setting of the A-Listed Inverness Library. – Confirms interest in maintaining dialogue as proposals progress on how this will be achieved. 	<p>Support noted. Interest noted.</p>
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust</u> <ul style="list-style-type: none"> – Farraline Park should be returned to civic use. Bus station must move if this area is to be successfully developed. Development impossible if not. – Clarify whether or not traffic will be routed through to Rose Street. 	<p>No change: It is not within the Council’s gift to prevent development taking place on the Royal Mail site until Farraline Park is re-developed. While opportunities may arise re-develop Farraline Park in the longer term, the Brief’s priority is to ensure any new development in the vicinity of Inverness Library will enhance the setting of the Listed Building.</p> <p>Accepted: text amended.</p>

– Reiterates need for an integrated transport plan.	Noted – no change: see previous response to similar comment from this respondent (Q18).
Living Streets – (Map A.3) Queries lack of consistency between this map’s graphics and other maps. – Re-development of Royal Mail site should facilitate: • Realignment of Railway Terrace and relocation of bus station (including rail replacement buses) to land adjacent to railway station; • Introduction of greenspace to Farraline Park.	Noted – no change: graphics have been selected to ensure each map is fit for purpose as a Development Management tool. Noted - no change: while opportunities may arise in the longer term to relocate the bus station and transform Farraline Park into green space, the Council’s current priority is to enhance the civic space in front of the Library, as shown in Map A.3.
Comments from individuals	
• (Para 3) Should distinguish "better" walking routes from cycling routes.	Accepted: Text amended

Site 3: Victorian Market	
Question 21: Tell us what you think about the development guidance for Site 3: Victorian Market. Two respondents	
Summary of comments received	Proposed response
Government/Statutory Bodies	
<u>Historic Environment Scotland</u> – Welcomes placemaking priorities; – Introduction should refer to Market’s status as a B-Listed building.	Support noted. Accepted: text amended.
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust:</u> – General agreement with development guidance. Supports re-modelling of main market hall for use as a public space, exposing original roof structure; – (Priority B) Entrances should be improved and accentuated.	Support noted. Accepted: Priority adjusted to accentuate entrances.

Site 4: 36-40 Eastgate
Question 22: Tell us what you think about the development guidance for Site 4: 36-40 Eastgate

One respondent	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust:</u> <ul style="list-style-type: none"> – The Council should use enforcement to prevent damaged buildings from deteriorating and lying unused. – Favours screening of scaffolding, as recently used at Town House. 	<p>Noted – no change: The Council’s powers of enforcement relate to unauthorised development or development that fails to keep to the terms of a planning consent. These are set out in our Planning Enforcement Charter.</p> <p>Accepted: Placemaking Principle 12 amended to refer to design of temporary hoardings.</p>

CASTLE HILL	
Site 5: Inverness Castle	
Question 23: Tell us what you think about the development guidance for Site 5: Inverness Castle	
Four respondents	
Summary of comments received	Proposed response
Government/Statutory Bodies	
<u>SEPA</u> <ul style="list-style-type: none"> – (Priority C) Amend to “Safeguard the distinct character and open space environment of Castle Hill” in recognition of the significant proportion of city centre open space provided by the Castle site. 	Accepted: Priority C amended.
<u>Historic Environment Scotland</u> <ul style="list-style-type: none"> – Welcomes placemaking principles and guidance. – Confirms interest/willingness to assist in developing proposals to transform Castle into a major visitor attraction. 	Support noted. Interest noted.
NGOs (including charities and campaign groups)	
<u>Inverness Civic Trust</u> <ul style="list-style-type: none"> – Guidelines lack boldness: full, not partial, re-development of Castle Hill is essential. Upgrading existing buildings on Bridge Street is unacceptable. – Redevelopment should involve an international design competition for all of 	<p>Noted: It is not within the Council’s gift to insist on simultaneous re-development of adjacent landholdings. The introduction to Site-Specific Development Guidelines for Site 6 (Bridge Street) has been expanded, however, to encourage prospective developers to assess opportunities for wider land assembly that would enable development to be more in keeping with the historic setting.</p> <p>Noted – no change: the Brief needs to promote a flexible approach to the adaptive re-</p>

<p>castle Hill.</p> <ul style="list-style-type: none"> - Suggestions include: <ul style="list-style-type: none"> ▪ A glass fronted building, hotel/restaurant/visitor area set into the embankment overlooking the river, below the Castle, using a similar approach to Urquhart Castle visitor centre. ▪ Integrating Castle Street carpark into its setting by capping it with a roof terrace that is landscaped to provide outdoor seating areas and a café. 	<p>use/re-development of the Castle and surrounding sites. It therefore avoids highlighting or prescribing specific design instruments (e.g. a competition) or solutions.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Maps A.5, A.6) Notes absence of access routes. Puts forward detailed proposals to reconfigure vehicle access to the Castle. 	<p>Noted - no change: The Brief's role is to set priorities and criteria for development management while promoting flexibility in detailed design, including access arrangements, for the transformation of Inverness Castle into a significant new visitor/cultural attraction.</p>

<p>Site 6: Bridge Street</p>	
<p>Question 24: Tell us what you think about the development guidance for Site 6: Bridge Street. Two respondents</p>	
<p>Summary of comments received</p>	<p>Proposed response</p>
<p>NGOs (including charities and campaign groups)</p>	
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Emphasises this site's importance as "the key site" in the city centre. - Guidelines lack boldness: full, not partial, re-development of this site is essential. Upgrading existing buildings on Bridge Street is unacceptable. - Re-development should be integrated with the wider project for Castle/Castle Hill, overcoming commercial, legal and financial implications. 	<p>Accepted: "Background" Para 6 amended to emphasise site's importance.</p> <p>Noted: It is not within the gift of the Council or this Brief to require simultaneous re-development of adjacent landholdings. The introduction to Site 6, Site-Specific Development Guidelines has been expanded, however, to encourage prospective developers to assess opportunities for wider land assembly that would enable development to be more in keeping with the historic setting.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Maps A.5, A.6 and A.7) Queries terminology used, including lack of consistency between maps and interpretation of "shared pedestrian vehicle surface". - Puts forward detailed proposals to reconfigure walking, cycling and vehicle infrastructure on Bridge Street, Castle Wynd, Bank Street and Castle Road. 	<p>Noted – no change: terminology has been selected to ensure each map is fit for purpose a Development Management tool, avoiding information-overload.</p> <p>Noted – no-change: setting prescriptive, site specific proposals to reconfigure walking, cycling and vehicle infrastructure is outwith the remit of this Brief. Changes to street design in the city centre will be approached on a case-by-case basis, taking account of levels of expected use and public feedback, including the needs of disabled people, to</p>

	ensure safe access for all.
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Site 7: Castle Street	
Question 25: Tell us what you think about the development guidance for Site 7: Castle Street	
Two respondents	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	
<u>Living Streets</u> <ul style="list-style-type: none"> – Correct text to show that Inverness Common Good Fund owns carpark serving Town House. – Puts forward detailed proposals to reconfigure walking, cycling, taxi or coach infrastructure at various locations including Castle Steps, the Townhouse, Culduthel Road, View Place. 	<p>Accepted: text amended.</p> <p>Noted – no change: setting prescriptive, site specific proposals to reconfigure or modify walking, cycling and vehicle infrastructure is outwith the remit of this Brief. Proposals put forward have been brought to the attention of the Council’s Transport Planning and Area Roads teams. Changes to street design in the city centre will be approached on a case-by-case basis, taking account of levels of expected use and public feedback, including the needs of disabled people, to ensure safe access for all.</p>
Comments from individuals	
<ul style="list-style-type: none"> • Queries whether safe, segregated walking and cycling routes will be provided. 	<p>Noted: Development criterion A2 has been amended to require development to follow Transport Scotland guidance Cycling by Design 2010 (Revision 1, June 2011), which identifies factors to be considered in determining whether shared use or segregated facilities are desirable.</p>

Site 8: Raining's Stairs	
Question 26: Tell us what you think about the development guidance for Site 8: Raining's Stairs	
One respondent	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	
<u>Living Streets</u> <ul style="list-style-type: none"> – Supports priority to make Stairs attractive. – Puts forward detailed proposals for improvements to pedestrian, cycle and taxi infrastructure. – (Map 8) Queries accuracy of map, including inconsistencies between 	<p>Support noted.</p> <p>No change: see response to similar comment from this respondent at Question 25.</p> <p>Suggested modifications to map and text have been considered and revised where</p>

terminology and text.	relevant and appropriate, ensuring they are fit for purpose as Development Management tools and avoid information-overload.
– (4) Disagrees with requirement for streetscape improvements on Castle Street.	Noted – no change. This requirement reflects current policy on levels of developer contribution set out in Section 8 of the Brief and in the Council’s Developer Contributions - Supplementary Guidance .

Site 9: 47-53 Castle Street	
Question 27: Tell us what you think about the development guidance for Site 9: 47-53 Castle Street	
One respondent	
Summary of comments received	Proposed response
NGOs (including charities and campaign groups)	
<u>Living Streets</u>	
– Supports priority to get this building repaired and reused. – Suggests public realm improvements, including changes to road markings, which will improve the setting of the Listed Building and views from the Castle.	Support noted. No change: see response to similar comment from this respondent at Question 25. Changes to road markings are operations issues that fall outwith the remit of this Brief.

CROWN	
Site 10: HM Prison Porterfield	
Question 28: Tell us what you think about the development guidance for Site 10: HM Prison Porterfield	
Six respondents	
Summary of comments received	Proposed response
Community Councils	
<u>Crown City Centre Community Council</u>	
– The Prison’s redevelopment must be undertaken sensitively, without detriment to existing properties in the area in terms of amenity impact, scale and traffic intensity.	Accepted: comment incorporated into placemaking priorities.
NGOs (including charities and campaign groups)	
<u>Highland Housing Alliance</u>	
– Supports re-development of HM Prison Porterfield to address city centre housing need.	Support noted.

<ul style="list-style-type: none"> - Cautions against listing the built heritage because of impact on viability of future housing projects, and potential for site to remain undeveloped. Instead it should be sufficient for development to be consistent with aims of the Brief. 	<p>Noted. However, since the draft Brief was published, the following Prison features have been given a Category B listing by Historic Environment Scotland: the Chapel, A Hall including former laundry and kitchen, B Hall and Boundary Wall. The introductory text to Site 10 has been amended accordingly.</p>
<p><u>Inverness Civic Trust</u></p> <ul style="list-style-type: none"> - Agrees that possible uses could include a mix of housing, Sheltered Housing and starter homes for young families. Potential uses for retained buildings include emergency refuge; training facility; Prison Museum; Public Centre; warden flat). - Considers treatment of prison wall (retention or not, height etc) to be key design challenge for successful integration into the area; - Highlights benefits of extending development to adjacent sites (Masonic Lodge and Viewhill House). 	<p>Support noted for proposed uses.</p> <p>Noted – no change: Map A.9 identifies the original wall fabric as a heritage asset and Guideline 2.a supports its retention and adaptation.</p> <p>Accepted: The introductions to Site-Specific Development Guidelines for Sites 10 and 11 have been expanded to encourage prospective developers to assess opportunities for wider land assembly that would enable more efficient land use that is sympathetic to historic assets and the Conservation Area.</p>
<p><u>Highland Historic Buildings Trust</u></p> <ul style="list-style-type: none"> - Welcomes Prison’s inclusion among sites identified for development and enhancement in this part of the city. 	<p>Support noted.</p>
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> - (Map A.9) Queries inconsistency between this and Maps 5.1 and 6.1, and notes omissions, including street names and text. - Objects to reducing height or forming openings in Prison wall. - Queries whether location is suited to accommodating elderly people because access to city centre is constrained. - Queries absence of detailed proposals for access improvements. - Puts forward proposals for managing vehicle movement and improving cycle 	<p>Accepted: Maps corrected.</p> <p>No change: the Brief recognises a need for flexibility in the treatment of the Prison’s heritage assets to maximise its potential for adaptive re-use.</p> <p>No change: IMFLDP already requires a proportion of accommodation provided on this site to be suitable for the elderly. Elderly people already live in this part of the city centre and there has been a strong interest from prospective purchasers in retirement homes currently under construction at the former Inverness College Midmills campus, not far from the prison site.</p> <p>Noted – no change: prescribing detailed proposals for access improvements is outwith the remit of this Brief.</p> <p>Noted – no change: see response to similar comment from this respondent at</p>

infrastructure surrounding the site.	Question 25.
Comments from individuals	
<ul style="list-style-type: none"> • Welcomes retention of wall/reduced height because this preserves privacy of existing houses. • Satisfied with placemaking priorities/guidelines apart from: <ul style="list-style-type: none"> – (Map A.9) Public open space should be located and configured to avoid attracting litter. – (A) Development should be in keeping with artisan atmosphere and character of its surroundings, including heights. – (E) Access for Blue Badge drivers must be protected/provided. – (1) should enable community use. – (4) colours should be sympathetic to surroundings (pink sandstone); public art should make reference to local history; stone left over from wall dismantling should be made available for public art or Conservation Area repair. – (5) traffic surveys and better management are required to protect residential amenity and improve cycle infrastructure. – Future public consultation on development at this location should prioritise use of Plain English. 	<p>Support noted.</p> <p>Support noted. Accepted: Re-numbered Guideline 4.c amended to prioritise good natural surveillance of open space to deter anti-social behaviour, including littering.</p> <p>No change: the Brief recognises a need for some flexibility in the scale and height of new buildings to promote development viability and to maximise the potential for sensitive design.</p> <p>Noted - no change: it is outwith the remit of this Brief to regulate Blue Badge provision.</p> <p>Noted – no change: the uses proposed in the Brief are consistent with those set out for this site (IN2) in the Inner Moray Firth Local Development Plan (IMFLDP).</p> <p>Accepted: Guideline 4.e expanded to encourage reference to local history, and re-use of existing masonry. Section 7 Placemaking Principles 8 and 9 already in place to guide elevational treatment and use of colour.</p> <p>No change: IMFLDP policy for this site requires the developer to prepare a masterplan/development brief that will address access and transport issues, including impact on existing traffic and residential amenity.</p> <p>Noted.</p>

Site 11: Viewhill	
Question 29: Tell us what you think about the development guidance for Site 11: Viewhill	
Four respondents	
Summary of comments received	Proposed response
Community Councils	

<p><u>Crown City Centre Community Council</u></p> <ul style="list-style-type: none"> - Expects full support and commitment from the Council and other agencies to restore this historic building. - Reports ongoing dialogue with and support for Highland Historic Buildings Trust's efforts to rescue and redevelopment of Viewhill House. - Disappointed by lack of historic building maintenance in Inverness. 	<p>Noted.</p> <p>Noted.</p> <p>Noted. Since 2005 the Inverness City Heritage Trust has awarded grants totalling over £2.6 Million to over 230 projects in the Inverness Riverside and Crown Conservation Areas.</p>
Government/Statutory Bodies	
<p>Historic Environment Scotland</p> <ul style="list-style-type: none"> - Welcomes placemaking priorities. - Confirms interest in maintaining dialogue with the Council on finding a future for the house. - Notes that building is B-listed (not C, as stated). 	<p>Support noted.</p> <p>Interest noted.</p> <p>Text amended.</p>
Business	
<p><u>Masonic Properties Inverness Ltd</u></p> <ul style="list-style-type: none"> - Extremely disappointed at lack of progress to restore this property. - Encourages support for timeous and sympathetic restoration of this iconic city building. 	<p>Noted.</p> <p>Noted – no change: Placemaking Priority B supports this objective but it is outwith the remit of the brief to set a timetable for development.</p>
NGOs (including charities and campaign groups)	
<p><u>Highland Historic Buildings Trust (HHBT)</u></p> <ul style="list-style-type: none"> - Welcomes: <ul style="list-style-type: none"> ▪ Viewhill's inclusion among sites identified for development and enhancement in this part of the city. ▪ Placemaking priorities. - Confirms HHBT's ongoing commitment to securing an economically viable future for this historic building. 	<p>Support noted.</p> <p>Noted.</p>

EASTERN GATEWAY LONGMAN ROAD	
Site 12: Longman Road	
<p>Question 30: Tell us what you think about the development guidance for Site 12: Longman Road</p> <p>Two respondents</p>	
Summary of comments received	Proposed response
Government/Statutory Bodies	
<u>SEPA</u>	

<ul style="list-style-type: none"> – (Guideline 9b) Add: “Green space should also be used to provide areas of attractive SUDS features.” 	Accepted: text added to Guideline 9b.
NGOs (including charities and campaign groups)	
<p><u>Living Streets</u></p> <ul style="list-style-type: none"> – (Map A.10) Queries lack of consistency between this and other maps in the Brief. – Queries absence of detailed proposals for access improvements. Puts forward detailed proposals to improve the walking and cycling environment on Longman Road, which include changes to Rose Street and Harbour Road roundabouts, and links to Innes Street and Burnett Terrace. 	<p>No change: map details have been selected to ensure they are fit for purpose as Development Management tools, and to avoid information-overload.</p> <p>Noted - no change: see response to similar comment from this respondent at Question 25.</p>

END