1 Recommendations

The Committee is recommended to:

1.1 Agree the relevant sections of Appendix 1 as Aberdeenshire Council’s response to the Main Issues Report for National Planning Framework 3, subject to the amendment set out in paragraph 2.3 of this report.

2 Background / Discussion


2.2 The Aberdeen City and Shire Strategic Development Planning Authority (SDPA) considered a report on the consultation, along with a proposed response to it on 19 June 2013 (see Appendix 1).

2.3 The one amendment to the report agreed by the SDPA (and included within its submission) is that reference should be made within the description of the ‘Carbon capture and storage’ national development (Main Issues Report – page 19) to “Carbon dioxide transport hub at Peterhead / St Fergus” rather than just at St Fergus. This was discussed with Peterhead Port Authority prior to submission, as agreed by the SDPA. This amendment would cover potential development at Peterhead for the import of carbon dioxide either by pipeline or by sea for onward transport and storage under the North Sea. It was also suggested that the NPF make reference to the fact that the carbon storage will be “offshore” rather than “onshore” (Section 4 – Questionnaire).

2.4 Aberdeen City Council agreed (at the meeting of its Enterprise, Planning and Infrastructure Committee of 21 May 2013) to delegate its response to the SDPA and has therefore made an identical submission.

2.5 Due to the close of consultation on 23 July 2013, Appendix 1 has been submitted to the Scottish Government as Aberdeenshire Council’s response to the consultation subject to ratification by the Infrastructure Services Committee today. Additional comments and amendments by Members may, with the agreement of the Scottish Government, be further forwarded as part of the Aberdeenshire response.

2.6 The Head of Finance and Monitoring Officer within Corporate Services have been consulted in the preparation of this report and have no comment to make.
3 Equalities, Staffing and Financial Implications

3.1 An equality impact assessment is not required as the recommended actions will not have a detrimental impact on people with protected characteristics.

3.2 There are no staffing or financial implications arising from this report.

Stephen Archer  
Director of Infrastructure Services  

Report prepared by: David Jennings, Aberdeen City and Shire Strategic Development Plan Manager  
Date: 3 July 2013
Date: 19 June 2013

Title: National Planning Framework 3: Main Issues Report and Draft Scottish Planning Policy Consultation Responses

1 Purpose of Report

1.1 The purpose of this Report is for the Strategic Development Planning Authority (SDPA) to consider and agree responses to two Scottish Government consultations on the National Planning Framework 3: Main Issues Report and draft Scottish Planning Policy.

2 Background

2.1 National Planning Framework 2 (NPF2) was published by the Scottish Government in June 2009, just prior to the approval of the current Aberdeen City and Shire Structure Plan.

2.2 NPF2 sets a spatial framework for the development of Scotland as well as identifying ‘National Developments’ – developments of strategic importance to Scotland which are essential to the delivery of the spatial strategy. Designation as a National Development is a mechanism for establishing the need for these projects and the principle of their development. Development Plans are required to take into account the National Planning Framework.

2.3 The SDPA held a joint NPF3 Seminar with the Nestrans Board in September 2012 and, at its meeting of 9 November 2012, agreed to the principle of supporting potential National Developments. The SDPA responded to early engagement at its meeting of 14 December 2012, covering both general comments as well as specific proposals for National Developments to be included within the framework.

2.4 The six general points made are summarised in Figure 1 below, along with the four proposals submitted for National Development status. More detail can be found in the report to the SDPA of 14 December 2012.
Figure 1: Summary of Early Response to Scottish Government on NPF3

<table>
<thead>
<tr>
<th>Topic</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plain English</td>
<td>Consideration should be given to preparing the Main Issues Report and NPF3 in plain English.</td>
</tr>
<tr>
<td>Infrastructure to facilitate growth</td>
<td>Infrastructure investment needs to be aligned with the capacity of different parts of Scotland to grow.</td>
</tr>
<tr>
<td>Energetica</td>
<td>Energetica has moved forward from concept to delivery and this needs to be reflected in NPF3.</td>
</tr>
<tr>
<td>Connectivity</td>
<td>Digital and transport networks need to be improved as these are vital for the economy.</td>
</tr>
<tr>
<td>Infrastructure to reduce carbon emissions</td>
<td>Deploying this infrastructure will be vital to meet climate change targets.</td>
</tr>
<tr>
<td>Quality of new development</td>
<td>Development of the highest quality is essential and the current economic climate is not a reason to lower standards.</td>
</tr>
</tbody>
</table>

Proposals for National Developments
Carbon Capture and Storage (Peterhead and beyond)
Aberdeen and Peterhead Harbours
Electricity Transmission Upgrades
Completion of A96 Aberdeen-Inverness Dual Carriageway

2.5 The Main Issues Report was published by the Scottish Government on 30 April 2013 with a closing date for representations of 23 July 2013.

2.6 Scottish Planning Policy (SPP) was published by the Scottish Government in February 2010 and was primarily a consolidation of the previous 23 SPP or NPPG documents. SPP is a statement of the Scottish Government’s policy on nationally important land use planning matters, with the current version setting out the principles and structure of the planning system, a series of over-arching themes as well as 18 subject-specific policy sections.

2.7 The SDPA responded to early engagement on SPP at its meeting of 14 December 2012. Figure 2 summarises the points that were made to the Scottish Government.

Figure 2: Summary of early response to Scottish Government on SPP

<table>
<thead>
<tr>
<th>Topic</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Welcome the commitment to plain English outlined in the participation statement.</td>
<td></td>
</tr>
<tr>
<td>SPP needs to be applied across Scotland and its varied economic, environmental and social challenges.</td>
<td></td>
</tr>
<tr>
<td>The scale and nature of the economic challenge varies across the country</td>
<td></td>
</tr>
<tr>
<td>High quality development is critical to attracting the skilled and mobile workforce required in Aberdeen City and Shire</td>
<td></td>
</tr>
<tr>
<td>Sections of SPP on housing need to be kept strategic, require clarification to remove inconsistency, use consistent terminology and set realistic</td>
<td></td>
</tr>
</tbody>
</table>
2.8 The draft SPP was published alongside the NPF Main Issues Report on 30 April 2013 and has the same closing date for comments of 23 July 2013.

3 National Planning Framework 3: Main Issues Report

3.1 The publication of the Main Issues Report (MIR) is to be welcomed as it gives all stakeholders an opportunity to input further to the preparation of the National Framework in advance of the proposed Framework itself. The proposed Framework is due to be published later this year and be laid before the Scottish Parliament for scrutiny.

3.2 Following a section on the Framework’s spatial strategy there are sections on a low carbon place; a natural place to invest; a successful, sustainable place; and a connected place. The MIR concludes with a section on ‘areas of coordinated action’ and a map of the proposed National Developments.

3.3 The MIR proposes that NPF3 retains the strategy contained in NPF2 but evolving it to reflect new circumstances, challenges and opportunities, with an even greater emphasis on ensuring the strategy is given effect through new development and infrastructure (para 1.5).

3.4 The spatial strategy section of the MIR has been reproduced at Appendix 1 as it provides a useful summary of the document as a whole. The MIR also includes 16 sets of questions distributed throughout the document, these have been consolidated in Appendix 2 (with a proposed response).

Area of Coordinated Action (p68/69)

3.5 The Aberdeen to Peterhead area has been identified as an ‘Area of Coordinated Action’ in the MIR (included within Appendix 1). It is one of six across Scotland identified as areas where major change is happening or anticipated. This recognition is welcome, as is the recognition that the Strategic Development Plan has a key role in this co-ordination. However, more work is required to ensure that the text of NPF3 accurately reflects the challenges and opportunities within this area. It is suggested that the Scottish Government engage with partners in this area (including the SDPA) around the text of the Framework.

National Developments

3.6 NPF2 contained three National Developments which were located (or partially located) in Aberdeen City and Shire. These were:

- ND 4: Aberdeen Airport
- ND10: New Non-Nuclear Baseload Capacity at Existing Power Station Sites
- ND 11: Electricity Grid Reinforcements
3.7 The provisional suite of National Developments set out in the MIR contains 14 proposals, with six located (or potentially located) in Aberdeen City and Shire:

- Onshore Infrastructure for Offshore Renewable Energy
- Grid Infrastructure Enhancements
- Grangemouth and Peterhead Carbon Capture and Storage
- National Walking and Cycling Network
- Aberdeen Harbour
- Airport Enhancements

3.8 It is proposed in the draft response (Appendix 2) that these six should all be welcomed, with specific comments provided on several of them.

3.9 Onshore infrastructure for offshore renewable energy (p15-17) – This designation currently covers the Moray Firth and parts of the Moray coast. However, the onshore implications of the Moray Firth windfarms are likely to be, at least partially, further east and covering Fraserburgh and Peterhead. It is suggested that consideration should be given to expanding this designation to cover the whole north coast of Aberdeenshire.

3.10 Electricity grid reinforcements (p21-23) – The key offshore link from Peterhead to England (potentially via south east Scotland) appears to have been omitted from the document’s main diagrams (but is shown on Map 5). This is a vital link which should be included within the National Development designation in NPF3. While the onshore links differ in reality from the diagrammatic representation in the MIR, this is not thought to be a major issue.

3.11 National Cycling and Walking Network (p32-34) – This designation is currently not locationally specific. Scottish Natural Heritage, Sustrans and Scottish Canals are asked to work with other (undefined) partners to respond to the MIR with proposals for a long-term vision and initial suite of priority projects to be considered for National Development status. The current thinking is that it ‘should be a linked network, connecting our main population centres, key tourist resources and public transport hubs’ (para 3.23). While tourism and recreation are seen as key objectives, the benefits are seen as extending to provide opportunities for everyday cycling and walking. Officers have already been in contact with SNH to suggest that local authorities, SDPAs and regional transport partnerships should be seen as important partners. It is suggested that the officers engage with SNH further to promote the case for potential links within Aberdeen City and Shire to be included within the national network. This could potentially focus on the Energetica corridor, the A96 corridor and the A93 corridor. It is further suggested that significant priority should be given to the active travel potential of such a network as well as its leisure and tourism potential.

3.12 Although not explicitly requested in the SDPA’s initial response or that from Aberdeen Airport, the MIR proposes to retain the National Development status of improvements to Aberdeen International Airport. It is proposed that this should be welcomed.
3.13 Experience in the implementation of NPF2 suggests that there is a need for greater clarity in the detailed wording of National Development descriptions in NPF3. It is suggested that the Scottish Government (working with partners) give this significant priority over the coming months. Uncertainty over what is covered by a National Development designation can cause challenges during the consenting process.

3.14 The only provisional National Development outwith the area which merits comment is High Speed Rail between Edinburgh and Glasgow. While Nestrans have supported high speed rail from England to Scotland, the MIR proposes amending the existing designation in NPF2 to make specific provision for a high-speed link between the two cities. The capital and revenue cost of this proposal are unknown, as are its potential benefits especially given the £750m currently being spent to upgrade the Edinburgh-Glasgow rail links. In light of this, there is concern that this project is being prioritised above overcoming constraints on the existing rail network throughout the country. For example, overcoming the constraints on the East Coast mainline just south of Montrose at Usan are highlighted as ‘requiring a significant level of investment’ (para 5.18).

3.15 Peterhead Port - While the port at Peterhead has not been identified as one of the National Developments, its importance is highlighted throughout the document and it does fall within the ‘area of co-ordinated action’. As a consequence, provided the importance of the port at Peterhead is highlighted in NPF3, it is not proposed to object to its omission from the suite of National Developments.

3.16 Aberdeen / Inverness Dual Carriageway (A96) – As with the port at Peterhead, the A96 did not make it on to the provisional list of national developments. This proposal was put forward jointly by two regional transport partnerships, three councils and the SDPA. While the project is highlighted (in the context of its inclusion in the Infrastructure Investment Plan), it does not receive the level of recognition a project of this nature deserves. Although it is not proposed to object to its omission from the suite of national developments, it is important that the proposed framework’s spatial strategy adequately reflects this project.

3.17 A 90 North of Aberdeen - In NPF2, the A90 north of Aberdeen was highlighted on the strategy diagram as being an important strategic transport route. This is no longer represented in the MIR. While the justification for this may be the focus on connections between the cities, this omission looks strange given the importance afforded the Peterhead area in other parts of the plan and the ‘Area of Co-ordinated Action’ identified between Aberdeen and Peterhead. The proposed response therefore requests that this important element of the spatial strategy diagram from NPF2 is retained in NPF3.

3.18 It is proposed that Appendix 2 be submitted to the Scottish Government as the SDPA’s response to the current Consultation.
4 Scottish Planning Policy

4.1 The publication of a draft SPP is welcome, especially as its publication alongside the NPF Main Issues Report allows for issues to be addressed consistently.

4.2 By its very nature, SPP is very wide-ranging in scope and not well suited to being summarised. After an introduction focused on the core values and outcomes for planning there are six principal policies followed by a range of subject policies.

4.3 The principal policies cover sustainable economic growth; sustainable development; engagement; climate change; placemaking; and the location of new development.

4.4 A series of 29 questions were asked in the consultation response form and these are presented in Appendix 3 (with a proposed response).

4.5 It is disappointing that the commitment to plain English review of the draft SPP was not carried out. The clarity of the document, particularly for non-professional audiences, has suffered as a result.

4.6 Concern is expressed over the prominence given to sustainable economic growth within draft SPP rather than it being seen as part of an integrated approach. Economic benefit is one factor among many which rightly influences planning decisions but it is appropriate that the development plan interprets this in a local context. As was highlighted in the SDPA’s initial submission, economic priorities vary across the country and this needs to be reflected in planning decision-making.

4.7 Significant changes are also proposed to policy for onshore wind. The revised policy focuses strongly on the need to meet renewables targets and weakens the protection afforded to local designations, setting out a fourfold classification of land for protection and potential (see Appendix 4). Concern is expressed at this approach.

4.8 It is proposed that Appendix 3 be submitted to the Scottish Government as the SDPA’s response to the current consultation.

5 Financial Implications

5.1 There are no financial implications arising from this report.
6 Recommendations

6.1 It is recommended that the SDPA agree appendices 2 and 3 as its response to the relevant Scottish Government consultations.

David Jennings  
Aberdeen City & Shire Strategic Development Plan Manager

Dr Margaret Bochel  
Head of Planning & Sustainable Development  
Aberdeen City Council

Robert Gray  
Head of Planning & Building Standards  
Aberdeenshire Council

Report prepared by: David Jennings, Aberdeen City and Shire Strategic Development Plan Manager, Andrew Brownrigg, Team Leader (Development Plan), Aberdeen City Council, Piers Blaxter, Planning Policy Team Leader, Aberdeenshire Council
Appendix 1: Extract from National Planning Framework 3: Main Issues Report
(p1-6,65,68,69)
Appendix 3: Proposed Response to Draft Scottish Planning Policy
Appendix 4: Proposed Classification for Onshore Wind Farms (Draft SPP)

Group 1: Areas where wind farms will not be acceptable:
- National Parks
- National Scenic Areas.

Group 2: Areas of significant protection. See policy on 'valuing the natural environment' for the specific requirements in relation to national and international natural heritage designations. Wind farms will only be appropriate in these areas where it can be demonstrated that any significant effects on the qualities for which the area is identified can be substantially overcome by siting, design or mitigation.
- Areas designated for their international or national heritage value, outwith National Parks and National Scenic Areas including:
  - World Heritage Sites;
  - Natura 2000 and Ramsar sites, including areas which support the integrity of European sites designated under the Habitats Directive, where development could result in significant adverse effects on the integrity of the European sites;
  - Sites of Special Scientific Interest; and
  - National Nature Reserves.
- Core areas of wild land as shown in the SNH map included in the Strategic Environmental Assessment Environmental Report.
- Areas where the cumulative impact of existing and consented wind farms limits further development, including areas where landscape capacity or similar studies indicate that carrying capacity for wind farms has been reached and further wind farms would have detrimental impact. Further wind farms are not expected to be appropriate in these areas unless decommissioning, repowering and/or redesign restores capacity to these areas.
- Community separation: a separation distance of up to 2.5 km is recommended between wind farms and cities, towns and villages identified in the local development plan. This is to reduce visual impact but decisions on individual developments should take into account specific local circumstances and geography. The guidelines should not be used to mitigate against noise and shadow flicker that will normally be subject to separate development management considerations.
- Areas safeguarded by planning policies, including:
  - scheduled monuments;
  - conservation areas;
  - the curtilages of listed building; and
  - sites in the Inventory of Gardens and Designed Landscapes.
- aviation and defence: civil aviation and defence consultation zones;
- land covered by broadcasting installations;
- flood risk areas: land that has an annual probability of flooding greater than 0.5% (1:200 yrs); and
- high quality unaltered peat: the carbon benefits of onshore wind in a progressively decarbonised electricity supply system can be significantly reduced when sited on deep peat and must be validated using the Scottish Government approved carbon calculation.
**Group 3:** Areas where planning constraints are less significant, where opportunities for wind farm development can be realised through good design or mitigation:
- regional and local landscape and natural heritage designations;
- scenic routes identified in National Planning Framework 3;
- long distance walking routes; and
- land with local landscape or natural heritage interest which is not designated, including land falling within the high or medium sensitivity categories in landscape capacity studies.

**Group 4:** Areas where wind farm proposals are likely to be supported subject to detailed consideration against identified policy criteria.
NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

   Organisation Name
   Aberdeen City and Shire SDPA

   Title  Mr ☐  Ms ☐  Mrs ☐  Miss ☐  Dr ☐  Please tick as appropriate

   Surname
   Jennings

   Forename
   David

2. Postal Address

   27-29 King Street
   Aberdeen

   Postcode AB24 5AA  Phone  Email

3. Permissions - I am responding as...

   Individual  /  Group/Organisation

   Please tick as appropriate

   (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

      Please tick as appropriate  ☐ Yes  ☐ No

   (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

      Please tick ONE of the following boxes

      Yes, make my response, name and address all available  ☐

      or

      Yes, make my response available, but not my name and address  ☐

      or

      Yes, make my response and name available, but not my address  ☐

   (c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

      Are you content for your response to be made available?

      Please tick as appropriate  ☒ Yes  ☐ No

   (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so.

      Are you content for Scottish Government to contact you again in relation to this consultation exercise?

      Please tick as appropriate  ☒ Yes  ☐ No
A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

   Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

   NPF3 could identify nationally significant sources of heat. Work has already been done, for example, looking at the thermal power stations in Scotland over the last few years and it is surprising that the MIR does not make direct reference to this.


2. How should we provide spatial guidance for onshore wind?

   Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government’s proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

   Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

   Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

   Is spatial guidance for onshore wind best left to local authorities?

   It would be appropriate for NPF3 to contain a map which identifies the nationally important designations specified in draft Scottish Planning Policy (those within groups 1 and 2 in the hierarchy). While this will not give a complete picture, it will give an indication of those areas afforded the most significant protection. It would be for local development plans to complete the exercise at the local level where cumulative impact, regional and local designations can be taken into account. A more detailed response to these issues is contained within comments of draft Scottish Planning Policy.

3. How can onshore planning best support aspirations for offshore renewable energy?

   Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

   Offshore renewable energy projects can have significant onshore impacts through the need to connect to (and upgrade) the national grid. There is a clear national need for such infrastructure but it is vital that it is sensitively sited and
well designed, taking into account the potential cumulative impacts of a number of proposals in the same area. The local benefits of such developments need to be maximised for the community.

The areas currently identified around the Moray Firth would appear to be misleading and not represent the intentions of developers. It is suggested that a more accurate representation should be provided for the proposed national development in NPF3 itself which encompasses the north Aberdeenshire Coast around to Fraserburgh and Peterhead.

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

The designation of the Peterhead Carbon Capture and Storage project, along with associated pipeline infrastructure as a national development is welcome. However, in the first paragraph of the description the storage will be offshore (rather than onshore) and in the second paragraph there is a need to replace 'St Fergus' with 'Peterhead / St Fergus' as these are the two possible hub locations. This supports the Proposed Aberdeen City and Shire Strategic Development Plan.

There is a clear national need to support the deployment of carbon capture and storage technologies. Peterhead seems to be the most likely project to be taken forward with DECC funding support.

The opportunities to extend CO2 networks beyond the initial demonstration project will need to be considered, including the safeguarding of key infrastructure. It is important that the National Marine Plan currently being developed by the Scottish Government reflects on the implications for the marine environment and competing uses for the seabed. In particular, there is a need to have a planned approach to the creation of a hub for the transport of CO2 to maximise the economic benefits to Scotland.

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?
It is important that the suite of grid enhancements is updated from those in NPF2 to reflect the anticipated need for such infrastructure across Scotland.

Peterhead is the possible landfall for a number of interconnectors rather than just one and has the potential to develop into a hub for the transmission of electricity, particularly in the marine environment. The link between Peterhead and the north east of England would appear to have been omitted from the diagrams within the Main Issues Report. This should be rectified before the Proposed Framework is published later this year.

However, the development of electricity transmission infrastructure seems to be extremely reactive rather than being planned in a co-ordinated way focused on efficiency and minimising impacts. The scope for a more joined-up approach should be explored, although the regulatory challenges are recognised.

Energy storage will become an increasingly significant issue over the period of NPF3 and has the potential to reduce demands on the electricity grid. The creation of hydrogen has the potential to be an important means of storage which could subsequently be used to decarbonise other sources of energy demand such as road transport. The potential link to Norway from Peterhead has a potential role in energy storage through Norwegian pumped-storage hydro schemes.

6. **Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?**

   Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

Generally, the emerging spatial strategy may help to facilitate investment at sites identified in the National Renewables Infrastructure Plan. However, NPF2 identified a strategic transport route north of Aberdeen towards Peterhead which has been omitted from the diagrams in the current Main Issues Report (particularly significant being its omission from the strategy map on page 1). The link between Peterhead and Aberdeen is vital to the local economy, critical to the oil and gas industry and to the delivery of the National Renewables Infrastructure Plan. It is also key to the delivery of Energetica and the area identified for co-ordinated action in section 6 of the MIR. It would appear to be the only part of Scotland performing a nationally significant role (including a number of national developments) which is not shown to be linked to the rest of the country in transport terms. This omission should be rectified, with the link re-instated as a key part of the spatial strategy in NPF3.

**A NATURAL PLACE TO INVEST**

7. **Can NPF3 do more to support sustainable use of our environmental assets?**
Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

Woodland expansion would be an obvious candidate for more attention in NPF3, identifying those areas which are likely to be the focus for such land use change. This should consider the multiple benefits that such expansion could bring in addition to climate change mitigation.

The potential value in the development of a National Ecological Network is unclear.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

No comment.

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Tourism is an important part of the regional economy and key to its development is building on the area’s strengths and assets. Transport (both to and within an area) and accommodation for both business and leisure tourists are important factors, as well as the softer issues of promotion and service. Protecting and enhancing the area’s natural and historic assets is important.

It is vital that the national development proposal for a national walking and
cycling network is not focused solely on tourism. While this will be an important component, active travel (everyday walking and cycling) needs to be facilitated through a high quality network and it is through this type of use that the real benefits to the country will be achieved in terms of health, reduced congestion and CO2 emissions from transport. Any active travel benefits should be seen as integral to the justification of routes.

10. Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

The policy position on waste is extremely weak. A ‘flexible, market-driven approach’ (para 3.29) is not a planning response to a significant national issue and is likely to hinder rather than facilitate the provision of the required infrastructure. If much of our waste is to be handled in small scale facilities as stated, proximity will be a key issue in determining location. It is unclear why no reference is made in Annex B to the Zero Waste Plan which sets out capacity requirements for landfill and other types of waste management infrastructure on a regional basis across the country - this would have assisted in identifying the location, scale and nature of the waste management challenge.

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?
housing for example) is vital to facilitate the growth that is already happening in the Aberdeen City and Shire (and the energy sector in particular). Investment is required to facilitate the growth that is already happening as well as support further growth. There needs to be much greater clarity about investment priorities and commitments of investment to support growth. Significant contributions from both the public and private sectors are required and NPF3 can highlight this.

Issues around town and city centres are best dealt with through SPP, town and city centre strategies and the development plan. It is difficult to see what added value NPF3 could bring.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

No comment.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

Housing need and demand varies considerably across the country. Locations where the levels are the highest need support to meet these needs. The infrastructure deficits created cause widespread public concern and real financial challenges for Local Authorities. Scottish Government infrastructure spending and revenue support needs to be more clearly directed at those areas experiencing the highest levels of growth. Although the MIR states that ‘NPF3 can play a part in ensuring that infrastructure is better co-ordinated with planned development’ (para 4.39), what this might mean is unclear. What is required is targeted support to facilitate growth. The Scottish Government have been slow in coming forward with any proposals which would facilitate development in any meaningful way.

Aberdeen City is completely covered by a pie chart in Map 21, obscuring the level of total housing supply.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?
NPF 3 Main Issues Report: Consultation Questionnaire

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

The emerging strategy fails to provide a clear spatial perspective on electric vehicle infrastructure requirements or highlight the potential for hydrogen to fuel vehicles during the lifetime of the plan (and what the spatial implications of these two fuel sources might be).

Meeting the Scottish Government’s own targets for cycling will require considerably more focus on supporting policies and infrastructure provision than is indicated in the MIR. Facilitating cycling into and within the country’s largest towns and cities should be seen as a national priority to be taken up by RTPs, SDPAs and Local Authorities (with the support of the Scottish Government, Transport Scotland and other national agencies and organisations).

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

There is a need to identify commitment to dualling the A96 between Aberdeen and Inverness.

There should also be recognition of the importance of the A90 linking Aberdeen with Dundee to ensure that this is not left as a ‘missing link’ when there are dual-carriageways linking all of Scotland’s cities. There needs to be a commitment to upgrade this section to at least the same standard (including grade-separated junctions).

There is a need to recognise the need for rail infrastructure upgrades including Aberdeen-Inverness and Aberdeen-Central Belt.

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?
Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

Support for the national development proposal at Aberdeen Harbour.

Support for the continued designation of Aberdeen International Airport as a national development. While the recognition of the importance of air links to the rest of the world (para 5.33) is welcome, from an Aberdeen City and Shire perspective links to the rest of the UK (and Heathrow in particular) are vital. However, there is a potential danger in widening the scope of the national development in the way proposed because the land uses associated with airports should properly be a matter for the development plan. In any event, airport masterplans would generally not cover areas outwith the perimeter of the airport except where this was required for an airport or wider transport-related proposal.

While retaining the current national development for high-speed rail is supported, any suggestion of expanding its terms needs to be treated with extreme caution. While generally supportive of the current national development, there is already a project to spend £750m on the rail system between Edinburgh and Glasgow. The costs and benefits of any additional high-speed rail project need to be set against other projects before this decision is made. For example, the East Coast mainline between Aberdeen and Edinburgh is extremely slow and has no prospect of being electrified for decades. For a long-distance journey between Scotland's four largest cities to be quicker by car than train is not acceptable and does nothing to support a shift to more sustainable transport options. Paragraph 5.18 identifies 'a significant level of investment' will be required to address constraints on the rail network at Usan (south of Montrose). However, no mention is made of the significance of the cost of high-speed rail.

There needs to be a clear focus on facilitating journeys by rail through a recognition of the role that local rail travel (including commuting) can have in reducing congestion, CO2 emissions and air pollution in Aberdeen and Aberdeenshire. Evidence suggests that rail use has grown considerably in the area over recent years and more needs to be done to support this trend.
Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?

2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?

3. Taking into account the environmental effects set out in the report, what are your views on:
   a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
   b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
   c) The proposed suite of national developments to be included in the Proposed Framework?
   d) Alternative candidate national developments?
   e) The policies proposed for the Draft SPP?
   f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?

5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?

6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

No comment.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

No comment.
Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

No comment.