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Submission to:

Local Government and Regeneration Committee; and
Infrastructure and Capital Investment Committee

Proposed National Planning Framework 3

This response is submitted by Nestrans and supported by Aberdeen & Grampian Chamber of Commerce.

Nestrans welcomes the publication of the Proposed National Planning Framework 3. The Aberdeen City and Shire Strategic Development Planning Authority (SDPA) have led the engagement from the north east of Scotland and responses have been jointly agreed by Aberdeen City Council, Aberdeenshire Council and Nestrans (the Regional Transport Partnership) as well as the SDPA itself.

Although the parliamentary process has given very little time to consider the contents and implications of the proposed framework (i.e. less than one week), this response has been drafted to inform the relevant parliamentary committees in their consideration of the document.

NPF3 is an important document which informs strategic and local development plans as well as private and public sector investment throughout Scotland. In light of its importance, Nestrans and the SDPA have been engaging with the Scottish Government on it over the last two years and are generally content with the Proposed Framework as published.

While it is unclear how the Scottish Government has responded to the previous responses made, there are two key issues which it is worth highlighting at this stage. These relate to the spatial implications of the growth in population and households and to the apparent priority being given to the development of high speed rail between Edinburgh and Glasgow when the justification for this project (in isolation from the wider scheme of linking Scotland to the UK network) seems limited and unassessed. This response will therefore consider each of these issues in turn.

Spatial Implications of Growth

National Planning Framework 3 has an important role in setting the context for development plans in Scotland and Derek Mackay's Ministerial Foreword makes it clear that it will also "inform future policies and investment decisions in areas such as transport, energy, health and wellbeing, climate change and land use" (page iii).

However, very little consideration is given in the Proposed Framework to the implications of the projected growth, particularly as it applies to infrastructure requirements to facilitate that growth.

The Proposed Framework (para 2.4) highlights projected household growth of 23% across Scotland as a whole and that this will be highest in Edinburgh, Perth and Kinross, Aberdeen, East Lothian and Aberdeenshire. However, neither the scale nor the implications of such growth are highlighted or addressed. It is assumed that these figures are drawn from the National Records of Scotland 2010-based Household Projections. These identify projected household growth of over 35% across Aberdeen City and Shire over the period 2010-2035.

While failing to facilitate such growth is strongly warned against, how it can be achieved in a time of severely limited public spending is not addressed. Significant household growth means significant infrastructure requirements even just to maintain existing levels of service provision. This is particularly the case where any 'spare' infrastructure capacity has already been used up, as is the case in Aberdeen City and Shire. While transport infrastructure is the obvious example, new primary and secondary schools are a significant element of expenditure as well as the need for much higher delivery of affordable housing. Some of these requirements will be highlighted in the Regional Transport Strategy and Strategic Development Plan but they will extend beyond these.

Without direct financial support from the Scottish Government, the infrastructure costs for this will be paid by the private sector and/or local government. The only alternative is the non-delivery of essential infrastructure which will be strongly resisted, not least by communities.

However, the Scottish Government's response to this issue is limited to an Action Programme reference to sharing best practice. This is not an appropriate response to an issue which has the potential to significantly undermine the ability to deliver growth and it requires more considered treatment in NPF3 and its Action Programme if the growth objectives of the framework are to be achieved. The Scottish Government has failed to address this issue adequately over recent years and this must not be the case moving forward.

The SDPA, Nestrans and both councils are at the forefront of trying to address these challenges and are keen to engage with the Scottish Government on this issue but it needs to extend beyond sharing good practice if it is to be effective.

National Developments

Nestrans welcomes those National Developments which are particularly relevant to Aberdeen and Aberdeenshire, namely:

- ND3 - Carbon Capture and Storage Network and Thermal Generation
- ND4 – High Voltage Electricity Transmission Network
- ND10 – Strategic Airport Enhancements (Aberdeen Airport)
- ND13 - Aberdeen Harbour

These are all identified in the Proposed Aberdeen City and Shire Strategic Development Plan which is currently with Scottish Ministers for approval.

There would appear to be some ambiguity as to whether the National Walking and Cycling Network development (ND8) includes the Aberdeen and Aberdeenshire coastal route (the

text suggests not but the diagrams suggest it does – p49 v p53). It is assumed that the diagram is incorrect.

However, in relation to National Development 9 (High Speed Rail) we continue to have serious concerns about including an Edinburgh-Glasgow line as a separate project to the wider link to the UK network. While the concept of linking Scotland to the high speed rail network emerging in the UK has been supported since the start, taking forward an Edinburgh-Glasgow project in advance of this is not. Although there is currently no published justification or business case for this project, prioritising it ahead of relatively modest improvements to the very slow journey times from Aberdeen to Inverness and Aberdeen to the central belt does not appear justified. This is even more significant given that a £650m project is currently underway to improve capacity and journey time between Edinburgh and Glasgow. High speed rail between the two cities is now being prioritised ahead of other improvements to the network such as electrification and journey time reductions from Aberdeen to the central belt (a 20 minute reduction on a current journey time of between 2hrs 30mins to 2hrs 40mins) by 2030. Given the importance of Aberdeen and Aberdeenshire to the economy of Scotland (recognised on page 12), the growth anticipated (see above), and significant resource scarcity, this prioritisation seems to be inappropriate or at least premature.

Nestrans is happy to expand on this submission to any of the relevant parliamentary committees if this would be helpful.

Yours faithfully



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