

**ABERDEEN CITY & SHIRE
STRATEGIC DEVELOPMENT PLANNING AUTHORITY**

Date: 14 December 2012

**Title: National Planning Framework 3 and 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 National Planning Framework 3 and 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 its 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 [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.
- 2.4 The Minister for Local Government and Planning announced details of the preparation of NPF3 and a review of SPP to the Scottish Parliament on 18 September 2012 ([Official Report](#)), along with early engagement and consultation on both in the period to 14 December 2012 and 11 January 2013 respectively.
- 2.5 At its meeting of 9 November 2012 the SDPA agreed to the principle of supporting potential national developments and receiving a report to this meeting setting out a wider response to the NPF consultation.

3 National Planning Framework 3

- 3.1 Prior to the last meeting of the SDPA a joint seminar led by the Scottish Government was held with the SDPA and Nestrans Board to consider the

preparation of NPF3 . A note was taken by the Scottish Government which is appended at Appendix1.

- 3.2 There are two elements required to respond to the early engagement by the Scottish Government. In addition comments of a more general nature (set out in more detail below), there is also a need to make submissions regarding potential 'National Developments'.

General Response

- 3.3 The proposed response is summarised below but set out in more detail in Appendix 2. It identifies a number of issues that it will be important for NPF3 and its Main Issues Report to reflect upon.
- It is important that NPF 3 recognises and takes the difficult decisions which need to be made to invest for the growth of the Scottish economy, facilitate the transition to a low carbon economy and meet the Scottish Government's Climate Change Act commitments. Aberdeen City and Shire is consistently identified as having significant potential for growth but investment is required to facilitate this growth.
 - The spatial strategy in NPF2 closely reflected the strategy set out in the current structure plan and proposed strategic development plan and this is welcome. Commitments to the AWPR and associated transport infrastructure are a welcome starting point but significant further investment in public transport, affordable housing as well as regeneration are also required if the area is to meet its potential for growth.
 - While the Energetica concept was highlighted in NPF2 it has developed considerably since then and there is a need to update this section of the document.
 - Connectivity is a key theme running through the Proposed SDP and improvements are vital for the Aberdeen City and Shire economy.
 - Aberdeen City and Shire has considerable potential to deliver infrastructure to reduce the carbon emissions from energy generation, both through energy generation, transmission and the capture and storage of CO2.
 - There needs to be a strong drive to improve the quality of new development. Development of the highest quality is essential to the future of Aberdeen City and Shire as it seeks to compete both nationally and internationally for a highly skilled and mobile workforce.

National Developments

- 3.4 In addition to a general response to inform the forthcoming Main Issues Report, a specific response is also required around potential 'National Developments'.
- 3.5 In addition to a mandatory requirement for national developments to be 'of more than regional importance', they are also required to make a significant contribution to one or more of the following:
- a) An 80% reduction in emissions by 2050.
 - b) Achieving the aims of the Zero Waste Plan.
 - c) The Scottish Government's renewable energy targets.

- d) Skills development, reducing unemployment and job creation.
- e) Strengthening Scotland's links with the rest of the world.
- f) Improving our digital, transport, utilities or green infrastructure networks.
- g) Adapting to or mitigating the effects of climate change.
- h) Improving the quality of the built or natural environment.

3.6 Of the 14 National Developments currently identified in NPF2, three are in Aberdeen City and Shire.

ND 4 - Airport

3.7 Discussions have taken place between Aberdeen Airport, the SDPA and Nestrans regarding the desirability of continuing with National Development 4 (Strategic Airport Enhancements). While it is vital that the importance of the airport continues to be highlighted in NPF3, the airport do not wish to pursue 'National Development' status at this time because their recent consultation on a revised masterplan did not highlight any schemes over the next 10 years which would merit such a designation. However, the airport is a significant asset of regional importance to the economy of the area which needs to be protected and enhanced. In particular, there is a need to deliver the planned surface access improvements as soon as possible to maximise the economic impact of the airport. These issues are highlighted in the draft response to NPF consultation (Appendix 2).

ND10: New Non-Nuclear Baseload Capacity at Existing Power Station Sites

3.8 It is not known that there is any proposal to provide new capacity at Peterhead Power Station, although it is understood that the UK government intends to publish a new strategy for gas over the next few weeks. However, there is considerable potential for the deployment of carbon capture technology at the power station and it is proposed to make a submission which encompasses both the capture of CO₂ at Peterhead as well as the transportation and storage infrastructure which takes in St Fergus, Peterhead Port and pipeline infrastructure throughout Scotland.

ND 11 – Electricity Grid Reinforcements

3.9 Two planning applications have now been approved under National Development 11 for a new electricity substation at Rothienorman ([APP/2011/2038](#)) and a substation extension at Kintore ([APP/2012/2133](#)). An application to the Scottish Ministers under s37 of the Electricity Act 1998 is anticipated in early 2013 for the re-insulation of the pylons along the route. If all permissions are obtained, this would conclude the consenting of this national development as far as Aberdeen City and Shire is concerned. However, it has become clearer over recent months that there are a number of additional electricity grid reinforcements which would merit National Development status in Aberdeen City and Shire. These focus on Peterhead in particular as a critical point in the onshore and offshore electricity transmission network. The link between Peterhead and Rothienorman may come forward for consent on a timetable which precludes any value being gained from National Development status.

3.10 As well as the three existing National Developments, three additional proposals are thought worth pursuing in partnership with others at this stage for submission as National Developments:

Carbon Capture and Storage

3.11 This proposal encompasses carbon capture at Peterhead Power Station, compression facilities at St Fergus, the importation of CO₂ to Peterhead Port and the transportation of CO₂ via pipeline. This proposal is of international as well as national importance, meeting a wide range of economic and climate change related criteria.

Aberdeen and Peterhead Harbours

3.12 Aberdeen and Peterhead Harbour developments to facilitate expansion and diversification through oil and gas, decommissioning, renewables, fishing and international trade.

Aberdeen – Inverness Dual Carriageway (A96)

3.13 A vital link between the two cities in the north of Scotland owned and managed by Transport Scotland. The route links two cities, crosses three council areas and two regional transport partnerships but is currently single carriageway for most of its length.

3.14 In addition to those proposals highlighted to the SDPA in the report to its last meeting, Members requested consideration of a regional food park as a further potential submission. The proposed development would appear to focus on the relocation of fish and other food processing businesses to one location where economies of scale could be generated and the future of food processing in the North East of Scotland secured.

3.15 It is proposed that the SDPA facilitate a meeting with Scottish Enterprise and the economic development services of both Aberdeenshire Council and Aberdeen City Council to explore the issues in further detail. Scottish Enterprise would appear to be key to any such proposal going forward as it has the potential to fit well with their focus on food and drink industries.

3.16 It is not known whether any other body is proposing to make a submission along these lines but there is insufficient information at the current time to submit it as a National Development for NPF3. However, it does feature as part of a study carried out by CBRE for Scottish Enterprise, Aberdeenshire Council and the SDPA looking at the potential for a development framework for the south of Peterhead and will also be taken forward in this context as well.

3.17 This leaves four submissions which it is proposed that the SDPA support:

- Carbon Capture and Storage
- Electricity Transmission
- Aberdeen / Peterhead Harbours
- A96 Dual Carriageway

3.18 Details of these submissions can be found in Appendix 3.

- 3.19 These submissions have been prepared with partners, although timing has for the most part precluded single submissions. Partners include other planning authorities, Nestrans and Hitrans, Scottish Enterprise, East Coast Renewables, Aberdeen Harbour Board, Peterhead Port Authority and Scottish and Southern Energy.
- 3.20 Each of these are included as proposals within the Proposed Strategic Development Plan due to be published for representations in January.
- 3.21 It is further understood that Tactran (Tayside and Central Scotland Transport Partnership) is making submissions in relation to both the A90 at Dundee and the rail constraint at Usan (Montrose). The proposed strategic development plan explicitly supports “proposals outwith the...area which reduce journey times by road and rail”. It is proposed that this support is expressed to Tactran as it finalises its submission.

4 Scottish Planning Policy

- 4.1 At the same time as announcing the start of preparation of NPF3, the Minister for Local Government and Planning announced a review of Scottish Planning Policy (SPP). The consolidated [SPP](#) was published in early 2010 so is less than three years old. However, the opportunity is being taken to review it alongside the NPF with the aim of re-focusing it on the importance of sustainable economic growth.
- 4.2 At this stage, preliminary views are sought by 11 January 2013 on those elements of the current SPP which work well, those which require amendment (with possible solutions) and what changes could be made to focus it more on sustainable economic growth and to emphasise place making.
- 4.3 It is anticipated that a draft SPP will be published by the Scottish Government in March 2013, with an opportunity at that point to respond in detail. The meeting of the SDPA in June 2013 will provide an opportunity to consider such a detailed response.
- 4.4 In the interim it is proposed that the draft response set out in Appendix 4 be submitted as the contribution of the SDPA at this stage to the review process.
- 4.5 The draft response just highlights a few issues at this stage:
- welcoming the review alongside the preparation of NPF3 and the commitment to use Plain English;
 - emphasising the importance of SPP and the need for it to be flexibly interpreted in areas with very different economic, environmental and social characteristics; and
 - highlighting a number of aspects of policy relating to housing where amendment and clarification would be welcome, including the need to make significant progress in the quality of new development.

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 – 4 as its responses to the relevant Scottish Government consultations.

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APPENDIX 1: NOTE OF JOINT SDPA / NESTRANS SEMINAR ON NPF 3 (9 NOVEMBER 2012)

Key points:

- Any proposals in NPF3 need to be deliverable, in particular the ability to fund them.
- Should consider case for re-opening Deeside and Formartine/Buchan railway lines, at least partially. Scope for the latter to support economic activity, in particular port and food related, in Peterhead and Fraserburgh if extended that far. Future fuel cost rises will make these options more attractive given increasing costs of driving.
- NPF3 needs to add value, not just reflect existing strategies and proposals. Concern though about it cutting across planning processes and local decision-making.
- Expansion of Aberdeen and Peterhead harbours may be candidate national developments. Aberdeen Harbour expansion of UK importance given opportunities for shorter sea-routes to Asia as polar ice melts due to global warming.
- Likewise carbon capture and storage proposals to Peterhead.
- Potential for integrated transport hub for the north-east.
- NPF3 should offer more direction on the scale and location of onshore wind energy development.
- Support for rail enhancements, including electrification
- Should 'invest in success' of the north-east, including requirements for new infrastructure to support the forecast growth. AWPR is being delivered to address existing issues, and infrastructure investment cannot stop at that.
- Need to recognise that finances are finite, and that favouring one project (eg High Speed Rail south to London) can reduce available finance for other projects (eg improving rail line north to Aberdeen).
- A rail tunnel under the Firth of Forth would cut journey times through Fife, and hence journey times between Aberdeen and Edinburgh.
- There is potential for a Food Park in the far north-east, delivering efficiencies for the white fish and other food sectors.
- There was a suggestion of duty-free zones around ports and harbours.
- Is there scope for NPF3 to offer a national strategy for facilities for Travelling People.
- There are big opportunities on oil and gas – exploitation west of Shetland, and in decommissioning.

Source: Scottish Government Meeting Note

APPENDIX 2: DRAFT RESPONSE TO NATIONAL PLANNING FRAMEWORK 3 – EARLY ENGAGEMENT

Thank you for the opportunity at this early stage to contribute to the preparation of National Planning Framework 3 (NPF3). This is an important document informing development plans and decision-making throughout Scotland. While this initial response is quite brief, it is anticipated that a fuller response will be required to the Main Issues Report next year.

The Strategic Development Planning Authority (SDPA) is a partnership between Aberdeen City and Aberdeenshire Councils and has a key role in guiding development over the next 25 years. Our vision is to create an even more exciting, modern and sustainable European city region - an excellent place to live, visit and do business.

The commitment in the participation statement for Scottish Planning Policy to the use of plain English and review by the Plain English Campaign is welcome. This has proved a welcome feature of the current Aberdeen City and Shire Structure Plan (2009) as well as Main Issues Report (2011) and the Proposed Aberdeen City and Shire Strategic Development Plan due to be published in January 2013. It is noted that no such commitment is made in relation to NPF3 and consideration should be given to the value it may bring to both the Main Issues Report and NPF3 itself. While this may be quite challenging, real value can be gained through removing barriers to participation and seeking consistent interpretation.

It is important that NPF 3 recognises and takes the difficult decisions which need to be made to invest for the growth of the Scottish economy, facilitate the transition to a low carbon economy and meet the Scottish Government's Climate Change Act commitments. This will require difficult spatial decisions to be made and investment priorities to be established. Aberdeen City and Shire was the only regional economy outside London to grow between 2008 and 2009 (latest available data) and is consistently identified as having significant potential for growth. Investment is required to facilitate this growth at a time when other parts of Scotland are significantly more constrained by economic fragility. Infrastructure investment needs to be aligned with the capacity of different parts of Scotland to grow.

The spatial strategy in NPF2 closely reflected the strategy set out in the current structure plan and proposed strategic development plan and this is welcome. There is a need for considerable infrastructure to deliver the growth identified in the plan and this needs to be reflected and prioritised in NPF3. Commitments to the AWPR and associated transport infrastructure are a welcome starting point but significant further investment in public transport, affordable housing as well as regeneration are also required if the area is to meet its potential for growth.

While the Energetica concept was highlighted in NPF2, it has developed considerably since then and there is a need to update this section of the document.

Connectivity is a key theme running through the Proposed SDP and improvements are vital for the Aberdeen City and Shire economy as well as national economy. Aberdeen Airport is a critical part of the transport network and it is important that improvements to surface access and the customer experience are made as soon as possible to ensure the economic impact of the airport is maximised. The rail network also has significant potential but there is an urgent need to reduce journey times both south and north of Aberdeen while facilitating local journeys through the addition of stations to the network. Digital connectivity is also a critical issue to prevent exclusion and to facilitate growth.

Aberdeen City and Shire has considerable potential to deliver infrastructure to reduce the carbon emissions from energy generation, both through energy generation, transmission and the capture and storage of CO₂. Deploying this infrastructure will be vital for Scotland to meet its carbon emissions targets. A number of potential national developments are proposed which will facilitate this.

There needs to be a strong drive to improve the quality of new development. While the current state of the economy will make this challenging, this is not an excuse for the poor quality of development so often seen in the past. Development of the highest quality is essential to the future of Aberdeen City and Shire as it seeks to compete both nationally and internationally for a highly skilled and mobile workforce.

I am happy to expand further on any of the points made above if that would be helpful but in the meantime look forward to the publication of the Main Issues Report next year. A separate submission has been made in relation to proposed National Developments.

APPENDIX 3: NATIONAL PLANNING FRAMEWORK – NATIONAL DEVELOPMENT SUBMISSIONS

National Planning Framework 3 - National Developments Proposal Form	
Proposer	Aberdeen City and Shire SDPA
Contact details	David Jennings, 27-29 King Street, Aberdeen, AB24 5AA, 01224 628214, djennings@aberdeencityandshire-sdpa.gov.uk
Date	14 December 2012
Title of development	Carbon Capture and Storage
Elements to be covered by national development status (list)	<p>The capture, transportation, compression and storage of CO₂.</p> <p>It is understood that Scottish and Southern Energy (and others) are making a submission in relation to elements of this proposal and will be better placed to define the individual components in more detail.</p>
Fit with criteria and statement of more than regional importance (guide - 500 words)	<p>This proposal is of more than regional significant because it has the potential to extend over numerous local authority areas, create a Scottish CO₂ network and establish an ability to import CO₂ from other parts of the world for storage – with a significant market potential.</p> <p>A) An 80% reduction in emissions by 2050 – emissions reductions from Peterhead Power Station would be significant but this effect could be multiplied as other sources of CO₂ (in central Scotland and beyond) make use of the transportation and storage infrastructure. Scotland has the potential to store vast quantities of CO₂ in depleted fields under the North Sea.</p> <p>D) Skills development, reducing unemployment and job creation – early deployment in Scotland has the potential for a competitive advantage to emerge in the technology which could be marketed around the world.</p> <p>F) Improving our digital, transport, utilities or green infrastructure networks – this proposal has the advantage of making ongoing use of existing pipeline infrastructure as well as enhancing the infrastructure to create a vital network to reduce CO₂ emissions for the future, stimulating further investment.</p> <p>G) Adapting to or mitigating the effects of climate change – de-carbonising the energy supply is a vital goal to achieve emission reduction targets and carbon capture and storage has a vital role to play, particularly in the</p>

	<p>medium-term.</p> <p>Scottish Enterprise reports:</p> <p>Economic Impact Assessment (2011)</p> <p>CO2 Transport Options for Scotland (2012)</p> <p>Carbon Capture and Storage Opportunities for Scotland</p> <p>Aberdeen City and Shire SDP - Main Issues Report</p>
Location (description, map reference, or map)	Peterhead Power Station, St Fergus Gas Terminal, Peterhead Harbour and pipelines linking these facilities and other potential sources of CO ₂ in central Scotland and beyond.
Public Engagement to date (guide - 100 words)	The Main Issues Report (2011) for the Strategic Development Plan highlighted the potential for CCS deployment. An earlier proposal received planning permission in 2007 but was abandoned due to lack of public sector funding.
Environmental Study / Assessment available? (yes / no)	An EIA is currently being prepared in relation to elements of the proposal.
<i>If yes, what significant effects were identified</i>	
Delivery timescale	2016 and beyond
Development lifespan	Different elements of the proposal will have different lifespans.
Consents required	Planning, Pipelines and Electricity Act among others. Marine consents will also be required.
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	No

National Planning Framework 3 - National Developments Proposal Form	
Proposer	Aberdeen City and Shire SDPA
Contact details	David Jennings, 27-29 King Street, Aberdeen, AB24 5AA, 01224 628214, djennings@aberdeencityandshire-sdpa.gov.uk
Date	14 December 2012
Title of development	Aberdeen and Peterhead Harbours
Elements to be covered by national development status (list)	On and off-site expansion of port related activity to facilitate renewables, oil and gas (inc decommissioning), fishing and transportation of CO ₂ as well as import / export activity.
Fit with criteria and statement of more than regional importance (guide - 500 words)	<p>This proposal is of more than regional significant because Aberdeen and Peterhead already play a vital role in the national as well as regional economy. However, they have significant potential to expand their impact, not just in oil and gas but also in renewables, decommissioning and general trading activity. Peterhead has the additional potential to play a vital role in the transportation of CO₂. If capacity is not available in Scotland, there is a real possibility that this work will go elsewhere in Europe.</p> <p>C) The Scottish Government's Renewable Energy Targets – offshore renewables will need to play a significant role in meeting the renewable energy targets and ports have a vital role to play in delivering on this potential.</p> <p>D) Skills development, reducing unemployment and job creation – both ports are working at record levels at the current time and need to expand to increase their positive enabling role in the wider economy.</p> <p>E) Strengthening Scotland's links with the rest of the world – both ports provide key links for trade with the rest of the world.</p> <p>F) Improving our digital, transport, utilities or green infrastructure networks – increasing the capacity of North East ports. Expansion at Aberdeen may offer greater capacity and flexibility for vessels serving the vital passenger and freight links to Orkney and Shetland.</p> <p>Aberdeen – 'Case for Growth' document published in September 2012, engaging stakeholders at this stage prior to wider engagement. Options include intensification of existing location as well as expansion in an adjacent</p>

	<p>coastal site. More information is available in the attached document ('Directions for Growth') published in support of the Harbour Board submission.</p> <p>Peterhead – The area around the port and to the south of Peterhead has significant potential to play a major role in delivering a number of key national developments. Some of the issues associated with this are explored in the attached draft 'Stakeholder Summary Report' prepared by CBRE for Scottish Enterprise and partners.</p>
Location (description, map reference, or map)	Within and in the vicinity of Aberdeen and Peterhead Harbours, recognising that expansion and associated facilities may not be located within current site boundaries.
Public Engagement to date (guide - 100 words)	Aberdeen and Peterhead are currently identified in the National Renewables Infrastructure Plan and the Aberdeen City and Shire Structure Plan (2009) and their potential was highlighted in the SDP Main Issues Report. Proposed Strategic Development Plan due to be published for consultation in January 2013.
Environmental Study / Assessment available? (yes / no)	No
<i>If yes, what significant effects were identified</i>	
Delivery timescale	Various
Development lifespan	
Consents required	Various
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	No

National Planning Framework 3 - National Developments Proposal Form	
Proposer	Aberdeen City and Shire SDPA
Contact details	David Jennings, 27-29 King Street, Aberdeen, AB24 5AA, 01224 628214, djennings@aberdeencityandshire-sdpa.gov.uk
Date	14 December 2012
Title of development	Electricity Transmission Upgrade
Elements to be covered by national development status (list)	<p>The upgrading of the electricity transmission network to enable the generation and transmission of renewable energy. Infrastructure required to enable offshore as well as onshore transmission.</p> <p>Upgrading transmission lines, substations and HVDC converter stations.</p> <p>It is understood that Scottish and Southern Energy are making a submission in relation to elements of this proposal and will be better placed to define the individual components in more detail.</p> <p>Re-insulating the line between Rothienorman and Peterhead is likely to progress in advance of NPF3 publication but should be recognised as an essential upgrade.</p>
Fit with criteria and statement of more than regional importance (guide - 500 words)	<p>This proposal is of more than regional significant because it has the potential to extend over numerous local authority areas and is essential for Scotland to meet its renewable energy targets.</p> <p>A) An 80% reduction in emissions by 2050 – emissions reductions will require the decarbonisation of the energy supply and transmission upgrades will be required to transport electricity from its source (in the north of Scotland) to central Scotland and further afield.</p> <p>C) The Scottish Government’s Renewable Energy Targets – essential infrastructure to enable onward transmission to markets and increasing security of supply.</p> <p>D) Skills development, reducing unemployment and job creation – there will be considerable job creation during the construction phase of the projects.</p> <p>E) Strengthening Scotland’s links with the rest of the world – linking electricity networks directly to England and elsewhere in Europe will facilitate a market for electricity, balance different sources of renewable energy, reduce the need for back-up generation and avoid the need for new onshore transmission lines through Scotland.</p>

	<p>F) Improving our digital, transport, utilities or green infrastructure networks – this proposal is essential to ensure the electricity network has the capacity to transmit an increasing amount of renewable energy from onshore and offshore sources from the north of Scotland. The capacity to balance renewable energy sources will also be increasingly important.</p> <p>G) Adapting to or mitigating the effects of climate change – de-carbonising the energy supply is a vital goal to achieve emission reduction targets and mitigate the impacts of climate change, linking locations of supply and demand.</p> <p>Aberdeen City and Shire SDP - Main Issues Report</p>
Location (description, map reference, or map)	<p>Peterhead acting as a hub for diverse linkages.</p> <p>There is a need to coordinate the delivery of this critical infrastructure, along with its delivery alongside other potential national developments in the same area.</p>
Public Engagement to date (guide - 100 words)	<p>The Main Issues Report (2011) for the Strategic Development Plan highlighted the potential role of Peterhead as a hub for electricity transmission.</p>
Environmental Study / Assessment available? (yes / no)	<p>An EIA is currently being prepared in relation to elements of the proposal.</p>
<i>If yes, what significant effects were identified</i>	
Delivery timescale	<p>2016 and beyond</p>
Development lifespan	<p>Different elements of the proposal will have different lifespans.</p>
Consents required	<p>Planning and Electricity Act among others. Marine consents will also be required.</p>
<p>Visual representation of the development available?</p> <p><i>If yes, please list and state if provided.</i></p>	<p>No</p>

National Planning Framework 3 – National Developments Proposal Form	
Proposer	Aberdeen City and Shire SDPA Supported by Nestrans, Hitrans, Highland and Moray councils
Contact Details	David Jennings, 27-29 King Street, Aberdeen, AB24 5AA, 01224 628214, djennings@aberdeencityandshire-sdpa.gov.uk
Date	14 December 2012
Title of Development	Completion of A96 Aberdeen-Inverness dual carriageway
Elements to be covered by national development status (list)	<p>Transport Scotland are taking the project forward and will be well placed to provide this level of detail. However, the following provides an indicative list:</p> <ul style="list-style-type: none"> • The principle of completing the dual carriageway between Aberdeen and Inverness; • The provision of appropriate junctions along the route; • The provision of high quality pedestrian and cycle links along the route; and • Associated environmental works.
Fit with criteria and statement of more than regional importance	<p>The proposal spans three council areas and two regional transport partnerships (with part also covered by an SDPA), linking Aberdeen and Inverness. The A96 is a trunk road (owned and managed by Transport Scotland) linking the two cities in the north of Scotland - a key theme of the Scottish Government's Cities Agenda. Furthermore the A96 is already identified in NPF2 as a National Transport Corridor, therefore giving recognition that the route is clearly of more than regional significance. It is important that its status is upgraded in NPF3 now that full dualling is proposed to give recognition to the connectivity benefits described below.</p> <p>D) Skills development, reducing unemployment and job creation – both Aberdeen and Inverness are experiencing economic growth, which is expected to continue and better connections into the cities and between them will help to consolidate this potential. The road will also improve access for tourists and commuters. This will also be a significant construction project in its own right which will provide construction jobs over a sustained period of time.</p> <p>F) Improving our digital, transport, utilities or green infrastructure networks – dualling of the A96 is included as a key scheme in the Government's Infrastructure Investment Plan (IIP). In line with the intention to improve connectivity between Scotland's cities, it will enable more reliable journey times between the north of Scotland's two main economic centres, Aberdeen and Inverness and remove through traffic from a number of smaller towns including Elgin, Keith and</p>

	<p>Nairn.</p> <p>The existing road has a poor safety record and suffers from delays and the effects of a traffic mix including farm vehicles, Heavy Goods Vehicles and faster traffic which combined with limited overtaking opportunities can cause frustration and accidents. Dualling will enable overtaking, improved junctions and reliable, consistent journey times helping businesses along the route and at both ends to plan their travel and goods movements better.</p> <p>The A96 also serves both Aberdeen and Inverness Airports and so consistent journey times helps to facilitate growth at both airports for connectivity to and from Scotland. Aberdeen Harbour is also a major gateway to Scotland.</p> <p>The IIP and the Cities' Alliance work recognises the importance of a high quality network of both roads and railways connecting Scotland's seven cities. This link is key to ensuring the completion of that network, with benefits to Scotland as a whole as well as the regions directly involved.</p>
Location (description, map reference or map)	The trunk road between Aberdeen at the junction with the Aberdeen Western Peripheral Route and Inverness at the junction with the A9.
Public engagement to date	Both the IIP and Cities' Alliance proposals are in the public domain and have been well received by communities across the north and north east of Scotland. The project has been included as a proposal within the Proposed Aberdeen City and Shire Strategic Development Plan which will be published for representations in January 2013.
Environmental study/Assessment available?	No
<i>If yes, what significant effects were identified?</i>	
Delivery timescale	2020-2030
Development lifespan	
Consents required	
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	<p>See Transport Scotland website:</p> <p>http://www.transportscotland.gov.uk/files/documents/projects/A96_Inshes_to_Nairn_-_Exhibition_Boards.pdf</p>

APPENDIX 4: DRAFT RESPONSE TO SCOTTISH PLANNING POLICY REVIEW CONSULTATION

Thank you for the opportunity at this early stage to contribute to the review of Scottish Planning Policy (SPP). This is an important document informing planning policy and decision-making throughout Scotland. While this initial response is quite brief, it is anticipated that a fuller response will be required to the draft next year.

The Strategic Development Planning Authority (SDPA) is a partnership between Aberdeen City and Aberdeenshire Councils and has a key role in guiding development over the next 25 years. Our vision is to create an even more exciting, modern and sustainable European city region - an excellent place to live, visit and do business.

The SDPA contributed to the last review of SPP in 2009 and will once again focus on those issues which relate to strategic planning.

The commitment in the participation statement to the use of plain English and review by the Plain English Campaign is welcome. This has proved a welcome feature of the current Aberdeen City and Shire Structure Plan (2009) as well as Main Issues Report (2011) and the Proposed Aberdeen City and Shire Strategic Development Plan due to be published in January 2013. While this may be quite challenging, real value can be gained through removing barriers to participation and seeking consistent interpretation.

It is important that the SPP can be applied in an appropriate way across Scotland – in a way which respects the different economic, environmental and social challenges each area faces. The development plan provides the mechanism for balancing these issues at the local level, within the context set by the SPP and the National Planning Framework.

While it is recognised that one of the primary aims of the review is to focus the policy more on sustainable economic growth, care is required to ensure it does not have unintended consequences given the wide variety of economic circumstances across the country and over time. Each area will have different priorities and it is important that these are respected. At a council area level in October 2012, for example, unemployment (claimant count) varied from 1.2% to 6.5% and from 2.1% to 5.8% in Scotland's four largest cities.

High quality development is critical to the economic future of Aberdeen City and Shire as it seeks to compete internationally for a skilled and mobile workforce. In this context, the objective of emphasising the importance of place-making in the revised SPP is also welcomed. However, once again it is important that this is able to find regional expression across Scotland. The text of the current SPP will need to be strengthened and re-focused if the important messages about the quality of urban design are to be given the strength they deserve.

Experience has shown over the last few years that the sections of SPP relating to housing are in need of clarification and amendment to make them both consistent and practical. This is particularly the case with the interaction between the

preparation of development plans, local housing strategies (LHS) and housing need and demand assessments in SDP areas.

It is vital that there is one set of agreed definitions which are widely understood which cover both development plans and local housing strategies. This is not the case at the moment and is leading to confusion and unnecessary work for those involved in preparing these documents and those challenging them. Terms such as 'housing requirement', 'housing target', and 'housing allowance / allocation' should be used and clearly defined in a consistent way.

It is important that a Housing Market Area approach is retained and that this approach is better reflected in LHS guidance which continues to focus on the council area level.

The mechanism set out in paragraphs 66-76 of SPP does not adequately reflect the different circumstances inside and outside SDP areas. It is important that city-region decisions are taken at the city-region level. The SDPA needs to be identified as taking the lead in this as the only relevant body with this geographical scope. An implication of this is a renewed emphasis on the inclusion of council housing services in this aspect of development plan preparation. As it stands, paragraph 69 currently suggests a different approach which is not deliverable in SDP areas.

Given the timetables for the preparation of SDPs and LDPs, the current requirement in paragraph 72 to "identify how much of the housing land requirement should be met by site allocations in the local development plan that are capable of development by the end of year 7" is unrealistic. As was the case with the Proposed Aberdeen City and Shire SDP, implementation of the previous round of LDPs will probably not be sufficiently far forward at the time a Proposed SDP is agreed to be able to make an accurate assessment of this. In any event, it will certainly not be possible when the Main Issues Report is published. This practicality needs to be reflected in the revised version of SPP.

I am happy to expand further on any of the points made above if that would be helpful but in the meantime look forward to the publication of the draft SPP next year.