

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

Tactran

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Guthrie

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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 provides a satisfactory spatial framework to achieve Scottish Government ambitions.

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?

No comment.

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?

No comment.

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 Cockerhills to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

No comment.

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?

No comment.

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?

In relation to Proposed National Development 26 : Onshore Infrastructure for Offshore Renewable Energy, and specifically the north sea area located adjacent to the Firths of Tay and Forth, the NRIP identifies Dundee as a key NRIP site and Montrose as a further potential site. Paragraph 5.23 makes reference to the potential need to prioritise access improvements to Port of Dundee. Tactran and Dundee City Council have recently upgraded road access to the Port of Dundee and Tactran has previously undertaken investigation into the potential for creating a rail freight connection into the Port.

The NPF3 omits any reference to STPR Project 29 : Improving the A90 at Dundee, which is considered to be a key omission in both the IIP (Map 23 of NPF3 refers) and the NPF3 generally. It is also of concern that the Tay and Central region is not included within the Areas for Coordinated Action at Section 6, which results in omission of 3 of Scotland's cities, a Strategic Development Planning area and the key Dundee - Perth - Stirling strategic transport corridor, in terms of coordinated action (see also answer to Question 15).

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?

No comment.

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?

The transport network - both services and infrastructure - is a key national asset which supports sustainable recreation and tourism. It is vital that efficient and effective use of the existing transport network is maximised and that the existing network is further developed in line with the Strategic Transport Projects Review, the Infrastructure Investment Plan and Regional Transport Strategies.

Tactran supports designation of a national network of long distance routes. This requires to be properly funded. It is noted that Map 11 fails to include proposed NCN routes between Perth and Lochearnhead, and between Doune and Callander.

There is scope to promote sustainable tourism through improvements to the public transport system in Scotland. In the Tactran region full implementation of STPR projects, including Highland Main Line improvements and electrification of all rail routes, would create an attractive public transport alternative to the private car to support sustainable access to recreation and tourism and also quality of the visitor experience.

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?

No comment.

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?

The NPF3 should highlight the critical importance of efficient, effective and sustainable connectivity and transport accessibility in the reinvigoration of our town and city centres.

Tactran supports the designation of Dundee Waterfront as a national development, reflecting the national significance and impact of developments included in the proposals, in particular the V&A development.

The Waterfront project includes proposals to significantly upgrade Dundee Station as a key strategic transport hub and visitor gateway. Other supporting infrastructure such as the current development of Park & Ride facilities on the strategic approaches to Dundee, in line with STPR Project 8, will also support and contribute to the sustainable economic growth potential of the Waterfront project. The maintenance and development of air services and facilities at Dundee Airport are also considered to be crucial to ensuring that the full economic growth and visitor potential of the Waterfront project is realised (see also answer to Question 16).

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

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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?

The CSGN should continue to be designated as a national development. It can play a significant role in promoting active travel, generating significant health and environmental benefits and improving access for leisure and tourism. The references to the role of planning in promoting health and reducing inequalities within 4.33 - 4.36 are strongly supported.

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?

The NPF3 should place a strong emphasis on the importance of and the need for spatial planning policy and planning decisions to have full regard to the transport and travel implications of locating housing and other development, and should provide clear and strong guidance on ensuring that development is directed towards locations which promote sustainable accessibility, travel choices and travel behaviour.

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?

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 spatial strategy is broadly consistent with the aim of decarbonising transport. However, as indicated in the accompanying response on the Draft SPP, it is considered that a stronger policy emphasis and prioritisation of the need to promote and deliver improved and more effective, efficient and sustainable transport options and solutions through the planning system will be required to support achievement of national targets for decarbonising transport. The recently published Emissions 2011 report identifies good progress generally in relation to meeting GHG targets but progress on transport emissions is less positive. Achieving Government's targets on decarbonising transport will require a stronger policy and delivery emphasis and priority on tackling transport carbon emissions through planning and other policy areas.

NPF3 is satisfactory in promoting walking and cycling, however increased

resources need to be made available to achieve the Government's aims. The NPF should give a stronger strategic commitment to “softer measures” such as Travel Planning. In terms of discussion under 5.9, Tactran would support the NPF3 highlighting the role and potential of city and town centres as integrated transport hubs and also NPF3 identifying the longer-term opportunities to promote more sustainable settlement patterns (see also answer to Question 13) that reduce the need to travel, thereby demonstrating a stronger policy commitment and support for substantially increasing the role of active travel and, more generally, the role of planning in promoting and delivering more sustainable travel choices and behaviour.

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?

A number of priorities identified in the STPR should be included and highlighted in NPF3. These are :-

Project 6: Electrification of Rail Network to Aberdeen and Inverness

Project 8: Park & Ride/Park & Choose around Dundee

Project 16: A9 upgrade from Dunblane to Inverness, including junction improvements Keir to Perth as well as dualling north of Perth

Project 28: Inverkeithing to Halbeath Rail Line

Project 29: Improving A90 through/around Dundee

Full implementation of STPR Project 15: Edinburgh to Glasgow Rail Improvement Programme to include electrification between Stirling/Dunblane/Alloa and Edinburgh/Glasgow

There is a need for a clearer and more comprehensive alignment between the transport requirements identified in NPF3 and the various strategically important transport projects and enhancement proposals identified throughout Scotland within STPR.

In addition, the strategic Perth Transport Proposals should be included as a national project, either individually or in combination with STPR Project 16. These proposals include Cross Tay Link Road and A9/A85 junction which are both existing priorities within the Tactran RTS and Delivery Plan.

The lack of inclusion of the Tay and Central region (previously included within NPF2 as the Dundee - Perth - Stirling strategic growth corridor) within the Areas for Coordinated Action identified in Section 6 of NPF3 effectively, and disappointingly, omits 3 of Scotland's cities, the TAYplan Strategic Development Planning region and the key Dundee - Perth - Stirling transport corridor, in terms of a national focus for coordinated action (see also earlier comments in relation to proposed National Development 26).

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?

Tactran supports the retention of the proposed High Speed Rail link to London as a national development. In terms of ensuring that the benefits of HSR extend to the northern parts of Scotland it is considered that previously identified STPR proposals for enhancing rail connectivity north of the Central Belt, including electrification of the rail network to Aberdeen and Inverness, Highland Main Line service improvements and rail service enhancements Aberdeen - Central Belt should be progressed in advance of any High Speed line between Edinburgh and Glasgow.

In terms of the growth of key airports the NPF2 included Dundee airport. The maintenance and future development of air connections at Dundee is considered to be vital in supporting the wider economic growth and visitor and tourism potential of the Dundee Waterfront Proposed National Development and Dundee airport should, therefore, be included within a National Development for growth of key airports within NPF3 (see also answer to Question 11 above).

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?

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The Environmental Report is considered to adequately assess the significant environmental effects of NPF3 and SPP, including strategic cumulative effects and strategic alternatives. As noted in the answer to question 15 additional national developments should be included in the Proposed Framework.

The proposed approach to mitigation and monitoring proposed in Section 6 is satisfactory.

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.

It is noted that this is only a partial Impact Assessment. It sets out a suitable set of population characteristics to be considered. However, this needs to be undertaken on the whole Framework and Policy and Tactran is not in a position to comment on the non-transport implications of these.

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.

It is noted that this is only a partial Impact Assessment. It needs to be undertaken on the whole Framework and Policy and Tactran is not in a position to comment on the non-transport implications of these.