

**Report to Partnership Meeting 23 August 2013**

**CONSULTATION**

**HITRANS RESPONSE TO THE NATIONAL PLANNING FRAMEWORK 3: MAIN ISSUES  
REPORT**

**Purpose of Report**

To inform Members of HITRANS response to the Scottish Government's Main Issues Report for the Third National Planning Framework.

**Background**

The National Planning Framework (NPF) sets the context for development planning in Scotland and provides a framework for the spatial development of Scotland as a whole.

It sets out the Government's Development Priorities over the next 20-30 years and identifies national developments which support the development strategy.

In response to an earlier NPF3 consultation call for 'Candidate National Developments' HITRANS has submitted several infrastructure projects identified in the Regional Transport Strategy as joint proposals in partnership with its member Local Authorities and NESTRANS.

In preparing this submission, HITRANS officials also liaised with other relevant organisations and joint support of our proposals is outlined where relevant. These include the following projects which while referenced in the Main Issues Report are not identified as Proposed National Developments.

- A9 Dualling and Highland Mainline Rail improvements
- A96 and Aberdeen – Inverness Rail improvements
- A82 / A83 / A95 Improvements
- North West Coast Area of Co-ordination Action

HITRANS welcomes the inclusion of the following as Proposed National Developments; Inverness Airport; A National Walking and Cycling Network and Areas of Co-ordinated Action' in association with onshore infrastructure for offshore renewable energy for Pentland Firth & Orkney Waters and the Moray Firth.

A copy of the full response is contained in **Appendix A**

**Recommendation**

1. Members are asked to note the report.

**Report by:** Neil MacRae  
**Designation:** Partnership Manager  
**Date:** 09 August 2013



## **HITRANS RESPONSE TO THE NATIONAL PLANNING FRAMEWORK 3: MAIN ISSUES REPORT**

### **Introduction**

The Highlands and Islands Transport Partnership (HITRANS) welcome the opportunity to provide comment on the National Planning Framework (NPF3) Main issues Report.

HITRANS responses to those questions in the consultation questionnaire which have relevance to strategic transport in our Area are provided below.

In preparing our response to the Main Issues Report HITRANS has worked closely with our key local authority partners in the region Argyll and Bute Council, Highland Council, Comhairle nan Eilean Siar, Moray Council and Orkney Islands Council to ensure we present a clear and consistent message with our community planning partners. This is designed to reflect local and regional priorities and link back to local development planning and the regional transport strategy.

It is disappointing that the 'reasonable alternatives' to the preferred options in the proposed framework are set out separately in the Environmental Report. Development Plans must present reasonable alternatives up front in the development plan and we would therefore expect a national planning framework to do the same to aid the transparency of the process.

Similar to Heads of Planning Scotland, we also feel that there should be a clearer and stronger link to the Government's cities agenda. We agree that this could be achieved with a greater focus on the seven Scottish Cities and their regions within NPF3, for example by articulating the key growth sectors for each city region, their transport connectivity priorities and providing a graphical representation of the key national assets and opportunities within the city regions.

The new style grey maps with colour coded themes are commended. However when viewing the document on line in particular many of maps and diagrams lack a key and are therefore difficult to interpret. Furthermore the legibility of a number of the maps is unclear due to scale and the level of information being conveyed.

### **Responses to Consultation Questionnaire**

#### **A LOW CARBON PLACE**

##### **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?*

HITRANS would welcome the inclusion of onshore infrastructure requirements for the first offshore wind developments, wave and tidal projects in NPF3 as a national development (National Development number 1 – Pentland and Moray Firth). The delivery and operation of these strategic developments is dependent on the suitability of the ports harbours and/or related development sites which serve them. HITRANS therefore welcomes the recognition in section 5.23 of the need to invest in the landward transport infrastructure to these areas such as the Far North Line and A9 between Scrabster and Inverness to reflect the dramatic increase in abnormal load movements that have resulted from both onshore and offshore renewable development in recent years. Similar consideration should also be given to other strategic landward connections important in serving other NRIP sites including the A83 to Campbeltown and the A890 for Kishorn. In the case of the Moray Firth the ‘balloon’ indicating the national development area should be drawn more widely to include the Caithness and Sutherland coast from Wick to Helmsdale, plus Nigg and Ardersier. The NRIP should not be viewed as the last word on how Renewable Energy Projects are served in terms of infrastructure requirements however particularly in regard to the infrastructure requirements for maintenance. Other ports may be ideally placed to serve this emerging sector and Buckie is particularly well placed to act as a service and maintenance centre for the Moray Firth. NPF3 should allow for investment in ports such as Buckie to be made in timely fashion if this is deemed the preferred port for renewable energy related activities.

### **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?*

HITRANS welcomes the focussed strategy being established through NPF3. However, the potential of several sites will not be fully realised without co-ordinated action to transform the connectivity of these sites. In particular, those sites on the west coast at Kishorn, Arnish and Campbeltown. To help facilitate investment in these sites there is a need for additional ‘areas of coordinated action’ that are focussed on a number of development opportunities on the west coast that encompasses areas of Highland, Argyll and Bute and Comhairle nan Eilean Siar. Further information on this potential additional area of coordinated action is provided in submissions made by our member local authorities and HITRANS supports these submissions especially in relation to strategic transport improvements.

### **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?*

HITRANS supports the designation of a national network of long distance routes as a national development and is disappointed that only a Central Scotland Green Network is identified in NPF3 MIR. The completion of the NCN78 between Inverness and Campbeltown is one long distance route which should be prioritised. However, It is also vital that the national development proposal for a national walking and cycling network is not just focused on the potential of tourism. While this will be an important component, active travel (everyday walking and cycling) needs to be facilitated through a high quality network of short links 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. HITRANS have leading the way in this regard through the development of a series of Active Travel Audits and Masterplans for the seventeen main settlements within its area and are actively seeking to implement the priorities which the Audits identified. Towns including Inverness and Elgin have among the highest levels of walking and cycling in the country and offer a realistic opportunity of achieving the Cycling Action Plan for Scotland vision of 10% of all trips by 2020 with the right investment.

## **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?*

*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?*

Section 4.21 and 4.22 emphasise the importance of cities and city regions in both NPF2 and NPF3. In order to support and develop key growth sectors within national economy including Energy, Life Sciences and Whisky which are based in Inverness and the surrounding Moray Firth, investment is required to bring the transport and telecommunication links with the wider economy up to a standard enjoyed by Scotland's other cities. This would be best facilitated through the inclusion of step change improvements to the road and rail corridors between Inverness and Perth and between Inverness and Aberdeen as National Developments.

HITRANS welcomes the inclusion of Stornoway and Fort William as strategic hubs and sites such as Nigg and Arnish as Enterprise zones but would highlight the importance of improving strategic transport links to enable these locations to realise their economic potential in their wider areas.

### **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 the top priorities should be? How can it better link with other infrastructure projects in Central Scotland?*

Please refer you to sections of our response to Question 9. HITRANS welcomes the approach to green networks. However, this a Scotland-wide Green Network should be brought forward as a national development rather than just focused on the Central Scotland Green Network as this tool/mechanism is being used elsewhere (including throughout the HITRANS area as indicated in Q9) and is a necessity if the Scottish Government's vision in the Cycling Action Plan for Scotland is to be realistically achieved.

## **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?*

HITRANS welcomes the focus of NPF3 in promoting cycling and walking networks provided that this has a national focus and is targeted towards those actions which can achieve the most significant modal shift.

### **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 the commitment to dualling the A96 between Aberdeen and Inverness.*

HITRANS, NESTRANS, The Highland Council, Moray Council Argyll and Bute Council and Aberdeen City and Shire Strategic Development Planning Authority worked collectively to promote the following schemes as candidate National Developments; the dualling of the A96; Inverness to Aberdeen rail line; dualling of the A9 between Perth and Inverness; Highland mainline between Inverness and Perth; A9 improvements between Inverness and Scrabster, A95 upgrading to better serve whisky production and A82 improvements.

NPF3 does not identify any road or rail improvements (except High Speed Rail which will have little or no direct benefit for the North of Scotland) as proposed national developments. HITRANS is disappointed that these strategic transport projects have not been identified as proposed national developments and continues to press for their inclusion as national developments (with support from the partners identified above) for the reasons outlined below.

Section 5.17 appears to argue that the reason for not identifying these strategic transport projects is that many of them are already identified in the Government's Infrastructure Investment Plan. It is appreciated that for the A9 and A96 there is a Ministerial commitment for the dualling of these roads to be delivered within a specified timeframe and a level of funding has been committed. However, for the most part, these projects are not committed in land use terms as they are not identified in development plans and do not have planning permission or other required consents. It is therefore considered that there would be significant merit in designating these roads projects for the purpose that national developments are designated for – to facilitate developments through the consenting process. Through designating the dualling of the A9 and A96 as national developments this would prevent the principle being debated during the consenting process.

HITRANS together with several other relevant public bodies consider the dualling of the A9 and A96 would bring significant benefits to the North of Scotland including; economic growth; improved road safety; improved journey times and reliability; improved access to tourism and recreation sites and improved links to pedestrian, cycling and public transport facilities.

Similarly to the position adopted in the Report on the A9 and A96 HITRANS believe there is a case for greater recognition of planned rail investment on the Highland Mainline and Inverness – Aberdeen line. These projects together with the EGIP (Edinburgh to Glasgow Improvement Package) were recognised as the main priorities for investment in Scotland's rail infrastructure in STPR and they should be recognised as such in NPF3 to ensure that they remain the main focus in delivery terms for the next major rail investment after completion of the Borders Railway and EGIP. These investments can bring truly transformational benefits for the movement of passengers and freight between Scotland's cities. They should assume a greater urgency in the next planning period than longer term developments including High Speed Rail. Consideration should be given to electrification of the Highland Mainline and Inverness – Aberdeen lines which will help tap into the vast renewable energy generation potential of the Highlands and Islands and allow this to decarbonise these rail corridors.

HITRANS would support greater recognition of the importance of the A95 (T) (Keith to Grantown) road for the whisky, food products and tourism sectors. This route is Moray's key connection with the A9 for a significant volume of food, drink and timber produce, and Speyside is referred to in this respect in para 4.16. The whisky industry in Moray is going through a multi-million pound expansion programme, with new, re-opened and expanded distilleries. This will increase the strategic role of the A95 from Speyside, and the requirement for the area to become "connected". The A95 does not feature on the Movement map on page 53 as a key transport route, but HITRANS is of the opinion that it does have this status and would wish to see it recorded as such. The map on page 55 does show A95 as a strategic road, but there are no proposals to carry out Transport Projects in the Infrastructure Investment Programme. Although it is stated in 5.4 on page 54 that NPF3 is not re-visiting transport infrastructure priorities, it is felt that this route should be afforded greater priority in future STPR and IIPs, and that it should still be identified in NPF3. The main Speyside artery (A95) between

Aviemore and Aberlour causes problems due to being too narrow for the size and volume of vehicles which use the route – in addition, soft verges along this route result in regular vehicle ‘rollovers’ – the resulting high accident/incident rates create costs, delays and safety impacts for both the industry and other users of this important route. Noting the value of the whisky industry to the Scottish economy, there is felt to be merit in considering a range of interventions to maintain and improve the A95/A941 corridor as a strategic route.

## 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 as 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 the longer-term spatial strategy?

HITRANS welcomes the proposed national development status for the enhancement of Inverness Airport. The facility and its enhancement is a connections node vital to the growth of the A96 Corridor, the surrounding Highlands and the national economy in terms of air freight exports and international tourism.

The MIR notes that there are proposals to improve connections to, and facilities within, Dundee and John O’Groats/Wick Airports, and the prospect of a new airstrip on Skye. It is also noted that Wick is shown as a regional airport in the ‘Connected Place’ graphic. Whilst the reference to these airports is welcomed, it is felt that NPF3 should give them greater emphasis. Air traffic has continued to grow at Wick John O’Groats Airport largely as a result of oil-related activities, and the airport also is well placed to service the growing renewables industry, in particular offshore wind farms. The airport will play a key role in for the development of the Orkney, Pentland Firth and North Caithness Area of Coordinated Action.

With regards to the prospect of Airport in Skye a feasibility study was published in March 2013 which found a forecast demand of 21,500 passenger per year and four options for creating the infrastructure and the minimum capital investment required, ranging from £2.3m to £15.3 million. There is wide support for the development of an airport from the Highland Council, HITRANS and Highlands and Islands Enterprise. It is therefore considered that NPF3 should give greater

support to the development of an airport in Skye, and reference to it should be included in an additional 'North West Coast' Area of Coordinated Action. The bid for a 'North West Coast' Area of Coordinated Action is explained further below.

#### *Other Comments*

Map 25 does not need to show every harbour as it makes it difficult to identify which are the important ones, i.e. many harbours have very limited/no economic activity and these should not be included. Others ports such as Wick and Scrabster appear to be illustrated in the same way as the smaller harbours despite being major hubs for various industries including renewables (onshore wind), timber, oil gas etc.

#### **Areas of Coordinated Action**

##### *Area 1: Orkney, Pentland Firth and North Caithness*

With regards to the opening paragraph for Area 1 on page 66 although it is correct to note the issues (decommissioning of Dounreay) and constraints (historic environment) in the area, we would request that NPF3 should also highlight the opportunities (renewables/energy) and strengths (workforce, economic base) which will continue to exist. The area benefits from a highly skilled workforce including a range of engineering expertise, the highest levels of health and safety and working with hazardous materials skills etc. The current workforce of Caithness, together with the continuing development of grid improvements etc., means that the region will play a leading role in the future of the renewables/energy industry in Scotland. This should be recognised in NPF3 in order to ensure that the skilled workforce is retained and not diverted elsewhere and to promote the wider benefits of inward investment, e.g. existing engineering base, proximity to wave, tidal and offshore wind sites.

##### *Area 2: Inverness and the Inner Moray Firth*

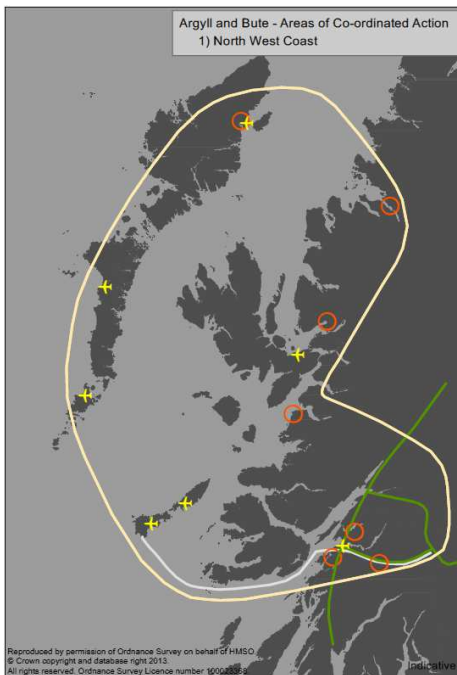
HITRANS also welcomes the continued identification of Inverness and the Inner Moray Firth as an Area for Co-ordinated Action. It is, as stated, an area identified for major change and investment. The specific, additional reference to West Link is welcomed but this should perhaps be broadened to include other strategic, Inverness City, transport improvements. For example the STPR and National Infrastructure Plan includes an A9/A96 connection improvement. All these strategic City transport improvements are to facilitate sustainable economic growth without compromising placemaking objectives. For example, West Link will allow peripheral expansion of the City without increasing city centre congestion and its environmental quality impact.

##### *Additional Area of Coordinated Action: North West Coast*

In common with Argyll and Bute Council, Highland Council and Comhairle nan Eilean Siar we feel that NPF3 fails to recognise the significant potential Scotland's North West coast can contribute to the sustainable economic growth

of Scotland. The proposed national developments and areas of coordinated action are distinctly focussed on the east coast and the central belt. As such, the Highland Council consider that an additional area of coordinated action should be included in the Proposed NPF3 that focuses on the North West coast of the country. Argyll and Bute Council and Comhairle nan Eilean Siar have confirmed they are supportive of this proposal. We are aware that both these Councils intend to present similar proposals demonstrating that many of the issues are connected and require coordinated action to address them.

The indicative area we wish to be included in an additional North West Coast Area of Coordination Action is shown below.



The area encompasses the neighbouring coastal parts of Highland, Argyll and Bute and Comhairle nan Eilean Siar. It would stretch from Oban in the south, through Mallaig/Arisaig, up to Ullapool to the north, and including the eastern coastline of the Western Isles.

The area would be focussed on a number of development opportunities including:

- Regeneration/enhancement of Ports and Harbours at Kishorn, Arnish and the Lorn Arc;
- Electricity grid reinforcements between Lewis to Ullapool and Tiree and Dalmally;
- Offshore renewables;
- Oban and Skye Airports;
- Improvements to the A82 and A85

- trunk roads;
- Tourism related developments; and
- Ferry links.

The National Renewables Infrastructure Plan (N-RIP) positions Kishorn and Arnish as key locations that can play an important role in support the development of a globally competitive offshore renewables industry based in Scotland. They form part of a West Coast cluster and together provide locations attractive to the supply chain for offshore renewables infrastructure. Arnish was also identified by the Scottish Government as an Enterprise Area. The Lorn Arc project is an ambitious £20 million proposal to improve marine and road infrastructure in the Lorn area. The proposal covers Oban, Dunstaffnage, Dunbeg, North Connel and Barcaldine.

The upgrading and reinforcing, including new links, of the existing electricity transmission network is vital to unlock the potential growth of renewable energy generation on the west coast and the expansion of onshore wind and hydro.

Improvements to the grid are also vital to allow the area to contribute to meeting national renewable energy targets. Key links on the North West coast that should be identified in the area of coordinated action include a subsea power cable between Lewis and Ullapool and Tiree and Dalmally.

The area contains a nationally significant marine resource in terms of offshore wind, tidal and wave energy. A number of major offshore renewables projects have been permitted and planned in the area including the world's largest commercial wave farm off the north-west coast of Lewis.

Oban Airport operates a limited number of scheduled services to neighbouring island communities. Momentum is building for the possible reintroduction of air links to Skye. A feasibility study was published in March 2013 which found a forecast demand of 21,500 passenger per year and four options for creating the infrastructure and the minimum capital investment required, ranging from £2.3m to £15.3 million. There is wide support for the development of an airport from the Highland Council, HITRANS and Highlands and Islands Enterprise. It is important that NPF3 recognises the investment made by relevant Councils and partner organisations to allow further investment be forthcoming to develop these airports further and allow them to link to a wider Highlands and Islands network to aid connectivity with the rest of Scotland and beyond.

The A82 and A85 form the main traffic corridors for the transport of residents, visitors, goods and services in and out of West Highlands, from nearby islands and then south to Glasgow and the wider central belt. Much of the route fails to meet modern standards for carriageway width and this brings with it issues of maintenance, congestion, traffic safety and traffic flows which impact on the economic growth potential for the wider area. Significant investment and improvements to the A82/A85 are therefore required to allow the proper functioning of the route as a strategic transport links serving the West Highlands and Islands.

Tourism makes a significant contribution to the economy of Scotland's North West coast. Many visitors take advantage of the numerous outdoor activities on offer in the area, particular tourism 'hot spots' include Fort William and the wider Lochaber area, Skye, Oban, Mull and the Western Isles. There are significant opportunities to develop additional tourism accommodation and to improve visitor attractions and experience in the area. Long distance walking/cycling routes are also important for the development of tourism. In particular the Hebridean Way is a key 'missing link' in the network and would maximise the economic benefits that can be derived from the islands natural environment and expose the significant Hebridean nature-based assets to a new audience.

Ferry links provide an essential transport link for many remote and fragile islands communities and are essential to the social and economic sustainability of these communities. We support an enhanced sea link network to and from the islands, with the re-establishment of a link between Lochboisdale in South Uist and Mallaig. The re-establishment of this ferry link would facilitate a reduction in travel times to market for locally produced goods and for people travelling to and

from the mainland, and also to shorten vehicles journeys between Uist and major destinations on the mainland resulting in lower carbon emissions. Additionally, this could further boost the economic impact of the investment in the road network between Mallaig and Fort William.

The key issues in this therefore area include:

- Building long-term community, economic and infrastructure resilience – in relation to addressing population decline and fragile areas
- The importance of tourism to the current and future economy
- Improved grid connection, broadband connections and mobile phone coverage
- Lifeline roads, airports and ferry services/facilities
- Retaining/upholding the population and particularly young people
- The importance of aquaculture to the economy
- The importance of the emerging off shore renewables industry

#### *Additional Area of Coordination Action: Island Arc*

We also support the promotion of an 'Island Arc' area of coordinated action which relates to tackling issues relevant to the islands Councils including Argyll and Bute, Comhairle nan Eilean Siar, Orkney and Shetland and the islands of our area. It is understood the relevant Councils are preparing a more detailed bid outlining key projects and opportunities in this area.

#### *High Speed Rail*

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 Highland Mainline between Inverness and Edinburgh / Glasgow is slow and even allowing for the planned investment identified in STPR and IIP it will remain quicker to undertake a long-distance journey between Inverness and the central belt by car than train. There are no plans for electrification of this route and we believe this should warrant the same consideration as any new High Speed Rail Infrastructure investment and would do more to deliver a decarbonised transport system.