

Report to Partnership Meeting 22 April 2022

CONSULTATION

National Planning Framework 4

Purpose of Report

This report introduces HITRANS response to the consultation on the draft National Planning Framework 4

Background and Introduction

A link to the consultation on the draft fourth National Planning Framework (NPF4) can be found at the following link <https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft/>.

NPF4 is a long-term plan that will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities. Importantly Draft NPF4 sets out Scottish Government's proposed approach to how planning and development will help to achieve a net zero, sustainable Scotland by 2045. HITRANS made submissions to an initial 'Call for Ideas' consultation that was to help inform the preparation of NPF4.

A report was taken to the Partnership Meeting in February outlining the key elements of the draft NPF4 spatial strategy and the proposed National Developments.

HITRANS Response

A copy of HITRANS response is attached as an appendix to this report. The final response reflected many of the key issues highlighted in the report to the February Partnership meeting including;

- a range of significant concerns in the way NPF 4 has handled the Highlands and Islands as a Region with major omissions contained in the strategy in terms of an absence of key National Developments in this region
- Welcome the fundamental aims of the National Planning Framework in providing a new spatial strategy for Scotland and its alignment with wider government policy, including the National Transport Strategy but identify a bias towards urban areas combined with a crude application of a rural label which misses the urban context and opportunities of parts of the HITRANS area.
- NPF4 and the strategy and action areas could do much more to address the disparities and inequalities between communities across Scotland
- Welcome commitment to an Islands Hub for Net Zero but highlight that the lack of detail as to what it entails and question why it only applies to Island Local Authorities rather than to all islands
- Highlight lack of reference to committed strategic transport priorities which are vital to the area and referenced in the National Transport Strategy including upgrades to the A82 and

A83 as well as A9 and A96 dualling programmes and rail infrastructure improvements to the Inverness to Aberdeen line and Highland Mainline

- Need for NPF4 to provide support and detail of how it will assist the transition to electric and hydrogen as alternative fuels
- Welcome the inclusion of a National Walking, Cycling and Wheeling Network as a National Development and the potential for HITRANS to play a key role in supporting its delivery.

RTS Delivery

Impact - Positive

Comment – The policies outlined in this key policy document will underpin the prioritisation of the projects within the RTS Delivery Plan

Policy

Impact - Positive

Comment – This policy documents provide a detailed and coordinated framework of policies at a national level which will have a direct impact on local and regional priorities

Financial

Impact – Positive

Budget line and value – No direct impact but the policies and priorities will provide a focus for future Business Plans

Equality

Impact –

Comment – Enabling a just transition is a key priorities of the updated National Planning Framework 4 but HITRANS has identified a number of concerns within our response where we feel that need to be addressed if NPF4 is not to reinforce existing regional inequalities.

Members are invited to;

1. Note the report

Report by: Neil MacRae
Designation: Partnership Manager
Date: 14th April 2022

Appendix A: HITRANS response to the National Planning Framework 4 Consultation

The Highlands and Islands Transport Partnership (HITRANS) welcome the opportunity to comment on the draft National Planning Framework (NPF4).

HITRANS response covers only those questions in the consultation questionnaire which have relevance to strategic transport in our Area. In preparing our response to the draft document, HITRANS response has been prepared by officers on behalf of the Partnership but we have worked closely with our partner local authorities in the region (Argyll and Bute Council, Highland Council, Comhairle nan Eilean Siar, Moray Council and Orkney Islands Council) as well as HIE and the Highlands and Islands Regional Economic Partnership 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.

HITRANS support each of our partners responses particularly where they offer a greater granularity of information at a local level.

National Planning Framework 4 - General Comments

There are a range of significant concerns in the way NPF 4 has handled the Highlands and Islands as a Region with major omissions contained in the strategy in terms of an absence of key National Developments in this region. While the timescales around ScotWind have made this a difficult fit with the production of the draft NPF4 the failure to recognise this huge national opportunity and seek to support the industrial activity that will be required by realising each lease area is a glaring omission in a Spatial Strategy that seeks to support development in Scotland to 2045.

The fundamental aims of the National Planning Framework in providing a new spatial strategy for Scotland and its alignment with wider government policy, including the National Transport Strategy, are welcomed. However, in the Action Areas and National Developments identified we consider there is a bias towards urban areas combined with a crude application of a rural label which misses the urban context and opportunities of parts of the HITRANS area.

It is felt that NPF4 and the strategy and action areas could do much more to address the disparities and inequalities between communities across Scotland. Given the vast majority of National Developments are either very generic or do not apply to the Highlands and Islands it is difficult to understand how NPF4 will help tackle the challenges facing the area including the requirement for significantly more per capita investment to achieve net zero. Beyond the recognition of the need to upgrade networks to support the expansion and transmission of renewable energy from the Highlands and Islands, NPF4 underplays the strengths of the region to contribute to national strategies and priorities across a wide range of sectors.

The commitment to an Islands Hub for Net Zero is welcomed but is lacking in detail as to what it entails and it is disappointing that it applies only to Island Local Authorities rather than to all islands. It would appear this commitment has been lifted from the Islands Deal with the geographic limits that creates but with the Island Centre for Net Zero rebranded as Hub instead of Centre? If this ambitious project can support the just transition to net zero for all island areas surely there is merit in extending this beyond the three unitary Island local authorities? Similarly, reference is made to optimising Oban Airport Drone activities as developed through the Argyll and Bute Regional Growth Deal but no reference is made to the Sustainable Aviation Test Environment project in Orkney that is providing a world lead in the move towards sustainable aviation and the use of new technologies including UAV Drones.

In terms of strategic transport priorities there is no reference to several advanced projects which are vital to the area and referenced in the National Transport Strategy including upgrades to the A82 and A83 as well as A9 and A96 dualling programmes and rail infrastructure improvements to the Inverness to Aberdeen line and Highland Mainline. Again, we appreciate that the timing of the Strategic Transport

Projects Review 2 would have made incorporating the strategic transport commitments within this challenging but several of these hugely significant projects for the Highlands and Islands have been longstanding commitments whose delivery would benefit from inclusion in NPF4.

Given the level of investment and planning required to support the expected transition to electric and hydrogen as alternative fuels we would also have expected NPF4 to provide more strategic support and vision for the infrastructure required for the transition to low carbon in transport and other sectors.

We welcome the inclusion of a National Walking, Cycling and Wheeling Network as a National Development and will outline the potential for HITRANS to play a key role in supporting its delivery.

The labelling and overlap between Action Areas causes some confusion with Highland, Moray and Argyll and Bute being covered by three overlapping Action Areas. Further, splitting Scotland into the proposed areas does not reflect the way in which key assets such as ports and harbours operate with the focus being local, Scottish, UK, EU and international in nature.

The reference and importance given within this national spatial strategy to the role the region can play in the national spatial strategy is limited in detail. The Highlands and Islands has the scope and assets to play a significant role in the delivery of the National Spatial Strategy. There needs to be greater focus on how to optimise the opportunities offered by this region while addressing the key challenges that currently limit its potential. Greater emphasis is needed on optimising the opportunities throughout the region while addressing its challenges in sustainable population terms, dispersed population and the infrastructure needed to better connect the region both physically and digitally.

NPF4 is going to be crucial to guiding planning policy in Scotland in the coming years. There are many welcome elements of the draft document but it is let down by being overly urban centric. This can be overcome by revisiting National Developments proposed by stakeholders. This should include reappraising the position taken on critical Transport Infrastructure Programmes in the Highlands and Islands including A9 and A96 Dualling, upgrading the A82 and A83 regionally significant road and rail programmes and the infrastructure investment needed to maximise the opportunities linked to ScotWind. Addressing this alongside the many positive proposals made in NPF4 such as the welcome inclusion of a National Walking, Cycling and Wheeling Network can help deliver a fairer Scotland that fosters opportunity in every part of the country.

Part 1 – A National Spatial Strategy for Scotland 2045

1. Sustainable places. Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment.

Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

The objective of the strategy ‘to encourage low- and zero-carbon design and energy efficiency, reduce the need to travel unsustainably, and diversify and expand renewable energy generation’ is welcome. However, the current reality in terms of travelling sustainably in rural areas is often very challenging with local bus service mileage declining while many services are becoming more remote from people in rural areas.

HITRANS has produced several recent reports that highlight how current support mechanisms for bus such as the National Concessionary Travel scheme and the Bus Partnership Fund are biased towards urban areas.

A regional approach to achieving targets such as the 20% reduction in car km by 2030 is needed. Travel is a means to an end and while many services can now be accessed online it is essential for Planning policy to ensure that the full costs of service delivery are understood rather than at present where efficiencies are being made by reducing the number of locations services are provided, the impact is higher costs being borne by the population who have travel further to access them.

2. Liveable places. Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.

Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

We support the vision set out under the theme of Liveable places but there is insufficient detail provided on the policies that will support this vision for us to comment on whether the ambitious vision will be realised in our region.

4. Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.

Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Again it is hard to make an assessment based on the amount of detail provided. For example what specific policies will enable our “towns and cities to be reshaped”?

6. Spatial principles. Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

We welcome the adoption of the principle for “compact growth” and higher density settlements. Evidence shows that higher density neighbourhoods are more walkable as well as being easier and more attractive to serve by public transport.

We also welcome the principles of local living but as highlighted elsewhere in our response there needs to be specific policies to help deliver this positive vision in rural areas. Communities that were previously 20min neighbourhood have now lost services from banks to healthcare and also suffered from reduced public transport.

It is not clear what benefit there is to rural areas within the action for “urban and rural synergy”.

7. Spatial Strategy Action Areas. Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

As we set out in our general comments the labelling and overlap between Action Areas is confusing with the apparent desire to express strategy through a number of action areas has, we

feel, forced differences of approach between areas when that is not always justified. For example, we contend that digital is already being relied upon for modernisation of service delivery and remains a high priority for further investment in the short and longer term in all areas. Similarly the Islands Hub for innovation should apply to all Scotlands Islands not just the Island Authorities.

The national spatial strategy is confusing for Argyll and Bute, Moray and especially Highland – which is covered by 3 action areas. This contrasts with the clearer vision established throughout most of the rest of the country.

8. North and west coastal innovation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?

We support the adoption of Action area 4 to ‘Strengthen resilience and decarbonise connectivity’. The target for the Highlands and Islands to become a net zero aviation region offers a great opportunity to decarbonise and make more efficient what is a lifeline form of connectivity for many islands and remote communities in the region.

9. North and west coastal innovation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?

There is little sense of the priorities needed to support the ‘strengthening resilience and decarbonising connectivity’.

10. Northern revitalisation. Do you agree with this summary of challenges and opportunities for this action area?

Do you agree with this summary of challenges and opportunities for this action area?

This includes Highland with parts of Argyll and Bute, Moray and much of the national parks. Again, while we agree with the issues, priorities and actions for this area we believe they extend beyond the boundary identified.

11. Northern revitalisation. What are your views on these strategic actions for this action area?

What are your views on these strategic actions for this action area?

This Action Area fails to recognise the unique and disproportionate contribution that Highland and Islands already plays, and will increasingly play in the future, to address national ambitions for net zero and particularly the decarbonisation of energy networks. This importantly includes the Opportunity Cromarty Firth project, which is referenced within the text, but this reference fails to recognise the national impact and significance, irrespective if OCF is awarded Greenport / Freeport status, that this project could have for the country in terms of renewables investment and hydrogen development, whilst concurrently acting as the catalyst for net zero.

As previously outlined it also fails to recognise the strategic Transport projects already committed and which are essential for the region to deliver its potential

13. North east transition. What are your views on these strategic actions for this action area?

Decarbonise connectivity

The projects referenced under the Decarbonise connectivity have already been constructed or relate to Aberdeen. There is no reference to strategic links within Moray. How will this action enable Moray to decarbonise connectivity within its area?

18. National Spatial Strategy. What are your overall views on this proposed national spatial strategy?

What are your overall views on this proposed national spatial strategy?

Part 2 - National developments

19. Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

20. Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

No.

21. Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Major committed transport schemes should be included in the list of national developments. Such a step would assist their delivery but also give confidence to business and local communities that these improvements will be delivered. These include the following projects:

- A9 and A96 dualling;
- A83 upgrade at the Rest and Be Thankful;
- A82 Tarbet to Inverarnan;
- Improvements to Highland mainline and Inverness Rail Station.

Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

Please see answer above