

General -

6b Publications and Consultations

o Purpose of Report

The purpose of this report is to inform members of a number of recent publications and consultation papers and to seek approval of draft responses as appropriate.

o Aberdeen City Council LDP Main Issues Report

Aberdeen City Council are currently consulting on a Main Issues Report as part of the development of the next Local Development Plan (LDP).

The Aberdeen Local Development Plan Main Issues Report (MIR) was approved at Enterprise, Strategic Planning and Infrastructure Committee on 12 November 2013. The MIR will be consulted on from **Monday 13 January until 24 March 2014**. The MIR sets out the options to address the most important planning issues in Aberdeen through the next Local Development Plan. All information can also be found on Aberdeen City Council website at

http://www.aberdeencity.gov.uk/planning_environment/planning/local_development_plan/pla_2016_main_issues_report.asp

A proposed response to this consultation is provided in Appendix A for consideration.

o National Planning Framework 3

The Scottish Government published 'National Planning Framework 3: Proposed Framework' on 14 January 2014 and laid it before the Scottish Parliament for 60 days' scrutiny. The Scottish Parliament will prepare a report for Scottish Ministers who will take this into account and publish the final version in June 2014.

The Proposed Framework and draft Action Programme are available from the links below:

<http://www.scotland.gov.uk/Resource/0044/00441850.pdf> (Proposed Framework)

<http://www.scotland.gov.uk/Resource/0044/00441815.pdf> (Draft Action Programme)

Four parliamentary committees (Local Government & Regeneration, Infrastructure & Capital Investment, Economy, Energy & Tourism and Rural Affairs, Climate Change & Environment) have put out calls for evidence to inform their scrutiny of the issues raised by National Planning Framework 3. Closing dates for comments vary but are either 30 January or 12 February 2014.

However, there are two issues which it is worth highlighting at this stage to inform the Scottish Parliament's scrutiny of the Proposed Framework.

The first critical issue is that the Proposed Framework doesn't address the spatial implications of growth across Scotland. The scale and location of expected household growth and the infrastructure implications of that growth are significant issues which are hardly touched on by the document. The Framework (para 2.4) highlights projected household growth of 23% across Scotland as a whole and that this will be highest in Edinburgh, Perth and Kinross, Aberdeen, East Lothian and Aberdeenshire. However, neither the scale or implications or such growth are highlighted or addressed. The only action identified in the Action Programme to address this is to "examine current planning authority approaches to aligning planning and infrastructure investment, and share good practice" (action 4). This recognises neither the scale nor urgency of this issue, with the text of NPF3 suggesting that facilitating growth is not an important priority for the Scottish Government.

The second critical issue is that the Proposed Framework identifies high speed rail between Edinburgh and Glasgow as a National Development. There is still no published justification for this project in isolation from the wider HS2 project from London yet delivery is identified for the mid-2020's (para 5.15). Over £650m is currently being spent to improve the rail network between the two cities – increasing capacity and reducing journey times. High speed rail between the two cities is now being prioritised ahead of other improvements to the network such as electrification and journey time reductions from Aberdeen to the central belt (a 20 minute reduction on a current journey time of around 2hrs 30mins to 2hrs 40mins) by 2030. Given the importance of Aberdeen and Aberdeenshire to the economy of Scotland (recognised on page 12) and the growth anticipated (see above), this prioritisation seems to be inappropriate or at least premature.

In order to meet the deadlines, a response has been prepared and submitted in collaboration with the SDPA to the Local Government & Regeneration and Infrastructure & Capital Investment Committees. The full response is provided in Appendix B.

o **Recommendation**

It is recommended that the Board:

- a) note the content of this report and the documents referred to above
- b) approve the suggested responses to the consultations.

RGM/RD/KC 4 February 2014

12 February 2014

Our Ref
Your Ref

KC/N14/5

Local Development Plan Team
Aberdeen City Council
Business Hub 4
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Marischal College
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Dear LDP Team

Aberdeen Local Development Plan Main Issues Report

I am writing in response to the consultation on the Aberdeen Local Development Plan Main Issues Report (MIR). As the Regional Transport Partnership for Aberdeen City and Aberdeenshire, we have focussed our comments on those issues that are relevant to transport. We generally support the policies and issues raised in the MIR and the objectives of the Local Development Plan. We would however like to raise the following specific points:

- **Main issue 1 - Greenfield housing and employment allocations:** We support the preferred option to carry over existing LDP sites and not to release further land from greenfield sites, other than the existing Phase 2 housing allocations and the sites identified at Peterculter. In relation to the issue raised regarding Raiths Rail Freight Facilities (site B0105) however we would wish to see this site retained for transport in order to preserve the potential for expansion of the rail freight facility. In relation to site B1202 Craiginches, we would also highlight the opportunity that the redevelopment of this site provides for improvements to Wellington Road, particularly for buses, pedestrians and cyclists and would request that consideration of such opportunities be given in any redevelopment proposals.
- **Question 1 – Review of city centre boundaries:** When carrying out a review of the city centre boundaries, it will be important to consider the impact that this will have on parking controls in any areas to be included or excluded from the city centre boundary. Consideration should be given to the objectives of the Regional Parking Strategy when considering any changes that might impact on parking controls.
- **Main issue 3 – Retail in the city centre –** We support the preferred option identified however would note that the site identified at Denburn / Woolmanhill is remote from the existing city centre retail locations and if this were to be taken forward significant improvements in pedestrian links between this and other city centre retail sites and careful consideration of car parking requirements would need to be given to ensure that this site is accessed primarily by sustainable modes.
- **Question 6 – Sustainable urban mobility plan –** We support the development of the SUMP and believe that one of the key objectives of this should be to reduce congestion and improve air quality in the city centre. Pedestrian priority should form a key part of this plan and this is supported through the Regional Transport Strategy.
- **Question 7 – A masterplan for the Beach Leisure Area:** We support the proposals to change the zone of this area and to create a Masterplan for the area, a key focus of which should be pedestrian, cycling and public transport links between the Beach Leisure Area and the existing city centre as well as consideration of appropriate parking supply and controls

- **Section 5 Infrastructure and transport:** We welcome the references made in section 5 to the Cumulative Transport Appraisal and the Strategic Transport Fund. In order to avoid confusion, it would be helpful if the presentation and wording of the interventions to be delivered through the STF were consistent with the way they are presented in the Strategic Development Plan.
- **Question 13 – Sustainable and active travel:** The proposed Strategic Development Plan makes reference to the development of strategic walking and cycle routes and Nestrans is currently in the process of developing an Active Travel Action Plan which will look at identifying a strategic active travel network for the region. Recognition of the need to develop and connect into a strategic as well as local active travel network should be made in the LDP to support the aims of the SDP and Regional Transport Strategy.
- **Main Issue 7 – Aberdeen Harbour Expansion:** Nestrans are supportive of the preferred option to create a new deep water harbour facility at Nigg Bay. The identification of a primary access from the coast road via Wellington Road and through the Altens Industrial Estate is supported however a full and detailed examination of the transport access requirements and the impacts of the development on the existing network, including the need for a second access, should be undertaken as part of the planning process.
- **Re-zoning of urban green space at Dyce –** We would request that consideration be given to reallocation of a section of land currently zoned as urban green space at Dyce, close to the railway station, to land available for transport purposes. This would provide an opportunity to enhance access to the railway station at Dyce and to increase parking available both for users of the station (which has seen significant patronage growth in recent years) and users of the Pitmedden playing fields and the Formartine & Buchan Way.

Thank you for the opportunity to comment on the Main Issues Report and I hope that these comments are helpful in developing the proposed plan. If you would like to discuss any of the points raised in more detail, please do not hesitate to contact me.

Yours sincerely

Kirsty Chalmers
Transport Executive (Strategy & Delivery)

Proposed National Planning Framework 3 – Call for views

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

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

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

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

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

Spatial Implications of Growth

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

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

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

While failing to facilitate such growth is strongly warned against, how it can be achieved in a time of severely limited public spending is not addressed. Significant household growth means significant infrastructure requirements even just to maintain existing levels of service

provision. This is particularly the case where any 'spare' infrastructure capacity has already been used up, as is the case in Aberdeen City and Shire. While transport infrastructure is the obvious example, new primary and secondary schools are a significant element of expenditure as well as the need for much higher delivery of affordable housing. Some of these requirements will be highlighted in the Regional Transport Strategy and Strategic Development Plan but they will extend beyond these.

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

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

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

National Developments

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

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

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

There would appear to be some ambiguity as to whether the National Walking and Cycling Network development (ND8) includes the Aberdeen and Aberdeenshire coastal route (the text suggests not but the diagrams suggest it does – p49 v p53). It is assumed that the diagram is incorrect.

However, in relation to National Development 9 (High Speed Rail) we continue to have serious concerns about including an Edinburgh-Glasgow line as a separate project to the wider link to the UK network. While the concept of linking Scotland to the high speed rail network emerging in the UK has been supported since the start, taking forward an Edinburgh-Glasgow project in advance of this is not. Although there is currently no published justification or business case for this project, prioritising it ahead of relatively modest improvements to the very slow journey times from Aberdeen to Inverness and Aberdeen to the central belt does not appear justified. This is even more significant given that a £650m project is currently underway to improve capacity and journey time between Edinburgh and Glasgow. High speed rail between the two cities is now being prioritised ahead of other improvements to the network such as electrification and journey time

reductions from Aberdeen to the central belt (a 20 minute reduction on a current journey time of between 2hrs 30mins to 2hrs 40mins) by 2030. Given the importance of Aberdeen and Aberdeenshire to the economy of Scotland (recognised on page 12), the growth anticipated (see above), and significant resource scarcity, this prioritisation seems to be inappropriate or at least premature.

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