

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to [npfteam@scotland.gsi.gov.uk](mailto: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

The South West of Scotland Transport Partnership (SWestrans)

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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?

### 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?

There is an potential conflict between the need for wind-farm development and conserving Scotland's rural landscape character. The safeguarding of celebrated landscape areas will increase pressure for development in less well known rural areas such as Dumfries & Galloway, where the landscape is an important tourism asset, particularly on transport corridors such as long-distance cycle routes and rural rail routes. Scottish Government could lead on gathering data to inform a national view on Scotland's capacity to generate renewable energy from wind within its landscape limits

### 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?

### 4. How can we support the decarbonisation of baseload generation?

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

**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?

**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?

**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?

**8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?**

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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?

## 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?

A national network of long distance routes should be designated as a national development. However, a greater national understanding is needed of what already exists and what is in development, possibly through an audit and mapping exercise. The map of routes (Map 11, page 33) needs to recognise routes in development, including National Cycle Route 73, Euro Velo Route 1, and the Southern Upland Cycleway in Dumfries & Galloway. Completion of NCR73 will provide an international connection to the long distance path network from Ireland via the Loch Ryan Ports. However, this is dependent on a Transport Scotland road improvement scheme at Drummuckloch to Innermessan, an outstanding element of the Port Facilities National Project. An early indication of when this project will be progressed would be welcome.

In rural areas such as Dumfries & Galloway designated long-distance routes are enhanced by key local routes and a network of low traffic minor roads which can play a role in connecting the long distance routes into local services and places of interest.

Rail connections into the long distance path network in rural areas are a valuable asset. Six of the seven existing stations in Dumfries & Galloway provide such connections: Gretna (NCR7); Annan (Annandale Way, NCR7); Dumfries (NCR7); Sanquhar (Southern Upland Way, Southern Upland Cycleway); Lockerbie (NCR74); Stranraer (Mull of Galloway Trail, Southern Upland Way, NCR73, EuroVelo 1, Southern Upland Cycleway). It is clear from Map 11 that Moffat is at the hub of many long-distance routes. However, the nearest rail-head to Moffat is at Lockerbie, some 15 miles distant. The Regional Transport Strategy for the South West of Scotland includes an aspiration for a station at Beattock to serve Moffat and the surrounding area, and there is a clear synergy of this aspiration with the proposed National Development. Other station aspirations in the Regional Transport Strategy,

including Thornhill, Eastriggs, and Dunragit/Glenluce could provide additional connectivity into the rural long-distance route network. There is potential linkage of the proposed National Development with the Scottish Stations Fund.

The recent Transform Scotland report 'The Value of Cycle Tourism: Opportunities for the Scottish Economy' makes a number of recommendations which should be considered as part of this national project.

The recognition within the draft Framework of the tourism potential of the Southern Scotland Biosphere Reserve and the Dark Skies Park is welcome.

## 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?

## 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 proposed National Project for Airport Enhancements including Prestwick, together with Prestwick International as an Enterprise Area, is welcome, as is the recognition of Dumfries as a 'Strategic Hub'. However, the Gretna/Lockerbie/Annan Triangle area is not recognised, and connectivity issues for Dumfries & Galloway associated with these designations are not addressed (see Q15 below).

The Framework should introduce an additional Area of Co-ordination to cover the east of Dumfries & Galloway, and to include:

- a) Dumfries Regional Capital: New hospital, Learning Town proposal, Crichton Quarter Masterplan, Ladyfield project, Whitesands Masterplan.
- b) Chapelcross Masterplan.
- c) A74(M) Development Opportunities.
- d) GLA Corridor: Implementation of masterplans for Gretna, Lockerbie and Annan.
- e) Recognition of Carlisle's importance to the South of Scotland's economy and transport networks in this area of co-ordination.

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

**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?

**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?

**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?

As a region without a city the South West is overlooked by the 'Links between cities and their regions' objective. The draft Framework recognises the need to connect to fragile communities to address rural disadvantage, but no specific intervention addresses external connectivity for the heart of Dumfries & Galloway. In particular, connectivity of the regional capital Dumfries with the national capital Edinburgh remains poor. Greater recognition should be given to the need for improvements on the strategic A76 corridor which provides cross-border connectivity to Prestwick Airport via Dumfries.

#### **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?

SWestrans supports development of High Speed Rail on a West Coast alignment with access to services at Carlisle. A High Speed Rail connection to London should be retained as a national development. However, the proposal needs to recognise the potential economic impact on the South West, depending on the provision of access at Carlisle. The City of Carlisle has an important transport hub role for communities in the south of Scotland, and a potentially economically critical role in the development of the National Project for High Speed Rail. Although it lies outside Scotland it may be desirable for NPF3 to recognise Carlisle's role in Scottish transport networks.

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### **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?



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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?

**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.

**Business and Regulatory Impact Assessment (BRIA)**

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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.