



**SCOTTISH CHAMBERS
OF COMMERCE**

Consultation Response

Scottish Government

**National Planning Framework 2
Discussion Draft**

Overview

1. Scottish Chambers of Commerce welcomes the progress since devolution towards reforming Scotland's planning system. The Planning etc. (Scotland) Act 2006 creates a platform upon which devolved government, local government, business and communities can work together to build a planning and development regime fit for the 21st century and focused upon the growth of Scotland's economy and the future prosperity of our citizens and businesses.
2. The National Planning Framework has a central role to play in setting out the structural challenges faced by Scotland and providing a route map to their resolution. It is important that the NPF is a truly Scotland-wide document and that it is tied together with the Government Economic Strategy, the National Transport Strategy, Skills for Scotland, and a National Energy Strategy, together with other relevant initiatives.
3. Business requires a means of feeding into the Government's strategic development planning in Scotland and needs a National Planning Framework which sets out clearly and unambiguously the Government's priorities for our national infrastructure, how these will be funded and delivered and by whom.

Transport Infrastructure

4. Scottish Chambers of Commerce believe that the nine national developments set out in the National Planning Framework 2 are all essential contributors to Scotland's future growth and prosperity. However Chambers of Commerce from around Scotland have indicated dissatisfaction at the focus on largely Central Belt projects to the virtual exclusion of nationally important developments elsewhere in Scotland. There are a number of additional contenders from throughout Scotland for inclusion in this list.
5. The future development of Aberdeen Airport receives only passing mention in NPF2, yet this is crucial not only to linking the United Kingdom's recognised centre of expertise in Oil and Gas to global markets, but also in ensuring that Scotland's rapidly growing renewable energy research and technology base has direct links to international centres. **SCC recommends that Aberdeen Airport enhancement should sit alongside Glasgow and Edinburgh Airport enhancement in the list of national developments.**
6. Scotland's other main regional airports at Prestwick, Inverness and Dundee will also continue to make significant contributions both to their respective local economies and to the Scottish economy as a whole. A report published in March 2008 concludes that Prestwick Airport generates £79 million Gross Value Added in Scotland each year, with a total expenditure of over £200 million per annum and supporting almost 3,000 jobs. All Scottish airports have key roles to play in growing Scotland's economy and ensuring that our nation and our businesses are connected with domestic and international markets.
7. Scotland's rail links are vital in linking up our economy both internally and externally, easing business travel and the free movement of labour and goods.

SCC welcomes the investment which has been made to date in creating additional capacity in Scotland's rail network, and we welcome future capacity enhancements which will help facilitate passenger and freight access to the railways, such as the Glasgow Airport Rail Link, which will not only create a much-needed multi-modal link but also increase line capacity on rail links to Ayrshire and West Central Scotland.

8. SCC supports the commitments contained within NPF2 to the facilitation of faster and more frequent links between Scotland's cities. However **we recommend an urgent commitment to Glasgow and Aberdeen Crossrail projects, together with further improvements to facilitate enhanced services at Edinburgh Waverley Station.**
9. SCC believes that Scotland's cross-border main line rail connections are essential for business and leisure purposes and provide future potential for efficient links to continental Europe. In addition, the East Coast main line provides vital intercity connections along the east of Scotland. These lines must be key priorities for future investment, and this will mean joint planning and investment between the Scottish Government and the UK Government. It is regrettable that the United Kingdom Government has not placed a higher priority on investment in High Speed Rail links between Scotland and London, and **SCC recommends that the Scottish Government should take the initiative by designating cross-border High Speed Rail as a national development.**
10. The future development of Scotland's road transport network is essential for our economy. In a survey conducted by the Chambers of Commerce, 95% [check] of businesses said that road transport was either essential or very important to their business. Scotland's economic success is dependent not only on fast and effective road links between our cities but also to rural Scotland, facilitating the growth of regional businesses and the tourist industry. Paramount among the demands of businesses throughout Scotland is the need for a new Forth Crossing, and SCC welcomes the commitment of the Scottish Government to this project. However more clarification is required on how this project will be financed. Announcements made by the Scottish Government of delays in vital projects such as the Aberdeen Western Peripheral Route are disappointing, as is the absence of any road transport projects on the NPF2 list of national developments, other than the Forth Crossing project. **SCC recommends that strengthening of our trunk road infrastructure should be a national development, including completion of the AWPR, M8 improvements and upgrading of the A9, A96, A82, A77 and A75. In particular, the development of the East Coast transport corridor on both road and rail, linking Aberdeen and the North East with Angus, Dundee, Fife, Edinburgh and onwards to London should be afforded priority status.**
11. Scotland's maritime transport links are of vital current and future importance and the strong focus on developing international port facilities within NPF2 is welcome. However SCC is concerned at the Scottish Government's reclassification of the Stranraer Waterfront Development Project from a 'national' to a 'local' priority. Stranraer is a key international gateway, linking Scotland not just with Northern Ireland but also indirectly to Republic of Ireland. **SCC**

recommends that the Stranraer Waterfront Development Project is restored to a national priority development.

General Infrastructure

12. The Planning etc. (Scotland) Act 2006 paved the way for a new approach to development which emphasised facilitation rather than opposition. A number of planning applications in Scotland are of such a scale that they take on a national, and indeed international, significance. Such applications are sometimes difficult to predict in advance and therefore cannot be incorporated into a static list of 'national developments', nevertheless they have a direct bearing not just on our economy as they directly impact on it, but also on Scotland's international reputation as a place of choice in which to do business. It is essential that these planning applications are identified at an early stage and fast tracked into the 'national development' planning route.
13. Since devolution, successive Holyrood administrations have been successful at facilitating the roll out of broadband internet services across Scotland. However some areas of the country, particularly in the Highlands and Islands, do not yet have access to this vital service. In addition, Scotland is in danger of falling behind our international competitors in terms of the data transfer speeds available on current services. It is essential that action is taken to enable better provision of broadband services in Scotland.

Energy

14. Any long term National Planning Framework must address Scotland's future energy needs. Clearly energy is a policy area where political responsibilities are divided between the Holyrood and Westminster Governments, and this is all the more reason to ensure that the respective administrations north and south of the border develop and operate coherent energy and planning policies designed to ensure that our economy can look forward with confidence to a future in which we can rely on a reliable, efficient, affordable and sustainable supply of energy.
15. SCC supports the designation of reinforcement and development of the electricity grid in Scotland as a national development. This work is essential if Scotland is to meet its renewable energy targets and create an electricity supply infrastructure fit for the needs of the 21st century. However it is important to recognise that Scotland's energy needs extend beyond renewable power, and NPF2 requires a greater focus on the planning requirements of non-renewable electricity generation capacity, which currently accounts for in excess of 80% of Scotland's generated electricity.
16. SCC recognises that the Scottish Government has expressed opposition to the long term use of nuclear power in Scotland, but it has yet to be demonstrated by the Government that Scotland's energy needs and its carbon reduction commitments can both be met in the absence of the replacement of Scotland's existing nuclear generation capacity with a new generation of nuclear reactors. The National Planning Framework should reflect the need for future non-

renewable energy developments in Scotland and **SCC recommends that Scotland's large scale electricity generation infrastructure should be designated as a national development in terms of NPF2.**

17. In terms of renewable energy, NPF2 misses an opportunity to set out a coherent and comprehensive policy for the siting of new generation developments. If Scotland is to meet its renewable targets whilst at the same time recognising genuine environmental and community viewpoints, then a firm set of criteria must be established for new developments which would give certainty to all parties with an interest. This would also assist in planning the future shape of the national and international energy grid. **SCC recommends that the Government sets out a clear geographical map and timescale for meeting our renewable energy targets as part of a comprehensive Energy Policy for Scotland with the objective of increasing economic growth at its heart.**

Key Recommendations

- **SCC recommends that Aberdeen Airport enhancement should sit alongside Glasgow and Edinburgh Airport enhancement in the list of national developments.**
- **we recommend an urgent commitment to Glasgow and Aberdeen Crossrail projects, together with further improvements to facilitate enhanced services at Edinburgh Waverley Station.**
- **SCC recommends that the Scottish Government should take the initiative by designating cross-border High Speed Rail as a national development.**
- **SCC recommends that strengthening of our trunk road infrastructure should be a national development, including completion of the AWPR, M8 improvements and upgrading of the A9, A96, A82, A77 and A75. In particular, the development of the East Coast transport corridor on both road and rail, linking Aberdeen and the North East with Angus, Dundee, Fife, Edinburgh and onwards to London should be afforded priority status.**
- **SCC recommends that the Stranraer Waterfront Development Project is restored to a national priority development.**
- **SCC recommends that Scotland's large scale electricity generation infrastructure should be designated as a national development in terms of NPF2.**
- **SCC recommends that the Government sets out a clear geographical map and timescale for meeting our renewable energy targets as part of a comprehensive Energy Policy for Scotland with the objective of increasing economic growth at its heart.**

About Scottish Chambers of Commerce

Chambers of Commerce comprise the world's largest business support organisation. In the UK, membership is voluntary and the Scottish Chambers, along with the British Chambers of Commerce, are prominent members of the worldwide movement of Chambers.

Membership is open to any firm or company irrespective of size. The current membership ranges from the country's largest companies to the smallest retail and professional operations. The present membership ranked by market capitalisation, includes 23 of the top 25 companies, and 38 of the top 50 companies in Scotland. Together Scotland's Chambers provide well over half the private-sector jobs in Scotland and provide an unequalled geographical and sectoral representation throughout Scotland.

The Scottish Chambers of Commerce is the umbrella organisation of the local Chambers of Commerce. Its prime functions are to promote and protect the interests of local Chambers and their member companies throughout the length and breadth of Scotland. It helps promote co-operation between the local Chambers in the provision of services and represents the common interests of Chambers at a national and international level. The President of the Scottish Chambers of Commerce is Her Royal Highness, The Princess Royal.

Scottish Chambers policy is determined by a Council on which all Chambers have equal representation, and is executed under their direction. Policy groups, formed from a wide cross section of member Chambers, are used to develop policy initiatives. The national body represents the interests of members to the Scottish, UK and European Parliaments, opposition parties, the Scottish Executive and other Government officials, Enterprise bodies, COSLA and other public bodies, and works with other private-sector business support bodies in Scotland on areas of mutual interest.

**Scottish Chambers of Commerce
April 2007**