My Ref:

POL 58 Scottish Government Consultations

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**NP11** 

**David Cullum Local Government & Regeneration Committee** The Scottish Parliament Edinburgh **EH99 1SP** 

**Dear Sirs** 

## PROPOSED NATIONAL PLANNING FRAMEWORK 3

I refer to the Parliamentary scrutiny of the third National Planning Framework (NPF3), which is being considered by the Local Government and Regeneration Committee on the 29th January 2014.

The Call for views on the Proposed NPF3 states that the Committees of the Scottish Parliament are 'seeking views on those aspects of NPF3 that are relevant to their remit.' To allow the Committee to take account of views, submissions are required to be submitted by midday on Thursday 30 January 2014. However, this submission date is after three out of the four Committees sit to hear the evidence on NPF3.

The Participation Statement, which accompanies NPF3, states that 'The Scottish' Government is committed to encouraging interest and wide public involvement in the preparation of NPF3.' The Participation Statement indicates that during the time when the Proposed Framework is laid before the Parliament for the 60 day period, the Proposed Framework is available for comment. We are aware that it is for the individual Committees to decide on the approach to engagement, including the form that the call for evidence will take, but there is very little up to date information on this on the Scottish Parliament website.

Based on the above shortcomings, Renfrewshire Council would like to submit points for the Committee to consider when they meet on the 29 January 2014. This is a holding response in order to give Renfrewshire Council members an opportunity to review the NPF3 Proposed Plan and associated documents and then put forward a formal response to proposed NPF framework.

The main points we would like the Committee to be aware of is the deletion of the improvements to surface access from Proposed National Development 10 - Strategic Airport Enhancements. Surface access improvements have been consistently part of the





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NPF since its first iteration and Glasgow seems to be the sole Scottish airport where a solution to these issues has not been delivered. It is welcomed that the business and economic development potentials of land surrounding the airport are recognised by the proposed NPF. However, these opportunities are just as affected by access issues as the airport. Deleting the surface access reference is therefore doubly significant in undermining the airport but in also undermining the economic development opportunities that surround it.

In particular, NPF3 Proposed Plan sets out the following statements in relation to infrastructure investment:

- The Ministerial Forward states 'NPF3 is the spatial expression of the Government's Economic Strategy and of the plans for infrastructure investment.' In relation to Proposed National Developments although the inclusion in NPF3 does not imply funding, it does suggest that priorities identified in NPF3 will be taken into account when future spending programmes are developed or reviewed;
- The Vision outlined in NPF3 identifies improved internal and international transport links to facilitate the ambition for growth. It is therefore disappointing to note that this does not include improving surface access to Glasgow Airport, which would help deliver this vision.
- Glasgow Airport is identified as having a 'Gateway Role' bringing economic and connectivity benefits, but again there is no mention of the connectivity to the airport in the Connected Place Section of the Proposed Plan or as detailed in Statement of Need and Description for Proposed National Development 10 -Strategic Airport Enhancements.
- NPF3 states 'connections, within our country and with the rest of the world, are crucial.' The Scottish Government's Infrastructure Investment Plan sets out the programme for investment in transport, with the Strategic Transport Projects Review providing the evidence base for this investment. Neither of these documents identifies improved access to Glasgow Airport and therefore by removing reference to this in NPF3, there is therefore no basis for investing in better routes to Glasgow Airport.
- Part of Proposed National Development 10 Strategic Airport Enhancements identifies progress on the delivery of the airport masterplans during the lifetime of NPF3. A fundamental part of implementing Glasgow Airport's masterplan is improved access to and from the airport to facilitate the significant opportunities for investment and business development.

Renfrewshire Council considers that this is a significant modification because it removes or significantly alters this proposal in the plan. There should be an opportunity for

everyone to provide views on this alteration and that comments regarding this could be put before all Committees for consideration when reviewing NPF3.

I would appreciate if the above information could be passed to the Committee Members for consideration.

Yours faithfully

Fraser Carlin

Head of Planning & Economic Development