



Aberdeen City Council Response

to

**National Planning Framework –
Call for Ideas**

Response to the National Planning Framework 4 – Call for Ideas.

1.0 Introduction

Aberdeen City Council welcomes this opportunity to engage in the preparation of the next National Planning Framework (NPF4) and furthermore we would welcome the opportunity to engage further on any aspects of our submission which the Scottish Government would like to explore.

We understand the broad range of consultations and policy work currently being undertaken by Scottish Government departments. We would stress the importance of this work being undertaken on a codesign basis, as was proposed at the start of the planning review. It is important that the views of the very professionals who will be tasked with the implementation of NPF4 at Planning Authorities across the country, is at the heart of the redesign. It is these officers, who understand the daily challenges the planning system faces and why many applications never make it past the preapplication phase. For our part we have engaged with officers across Aberdeen City Council to prepare this response.

In relation to the revised format of the NPF, combining NPF with Scottish Planning Policy (SPP), this we feel is a logical step and one which we greatly support.

Moving the Scottish Government's policy direction away from SPP to a statutory footing of NPF4 gives all parties to the planning system, the public, applicants, planning authorities and the Planning and Environmental Appeals Division (DPEA), a clearer understand of what is required of them. While SPP is a useful document what weight it carries in decision making can often be confusing. We would also suggest that NPF4 should be aligned across all Scottish Government key indicators such as the National Performance Framework, as the focus must be on achieving outcomes.

Where these policy positions can also be aligned with infrastructure delivery, or infrastructure investment, this will provide the greatest opportunities to see the visions of Local Development Plans (LDP), Regional Spatial Strategies (RSS) and NPF4 being delivered. This is particularly important in the context of the Scottish Government's commitment of achieving Net Zero by 2045, the subsequent ambitions of Local Authorities and the Infrastructure Commissions Initial report:- *Phase 1: Key findings report – A blueprint for Scotland*. Our national Net Zero by 2045 target means that there is no longer time to make the mistakes of the past and leave it for future generations to rectify them. To quote the Intergovernmental Panel on Climate Change (IPCC), "*Limiting global warming to 1.5°C would require rapid, far-reaching and unprecedented changes in all aspects of society.*" NPF4 must be one of those changes.

2.0 Format of our submission

Below we have set out a range of policy topic areas which we feel should be included, including our justification for their inclusion. We have also included a range of infrastructure projects which are either of Regional or National importance. Where possible we have tried to align Policies with Infrastructure projects, recognising that some of these crosscut other areas such as transport and housing. While NPF4 cannot necessarily set policies in those areas we feel it is important that NPF4 is used as an opportunity to influence policy formation and decision making in those areas. We have recently submitted a response to the Housing 2040 consultation which echoes many of the comments below. We and our regional transport partners NESTRANS similarly feed into the National Transport Strategy (NTS).

3.0 The Vision of NPF4

We feel that the vision for NPF4 must be strong and clear with a timeline and expected deliverables built in. Setting ambitious targets is laudable, but our focus must now be very clearly on achieving them. Net Zero by 2045, or sooner, must be the central tenant of the vision and all investment and infrastructure projects must be focused on that outcome. In terms of sustainable development, the environmental pillar must now be given greater weight. Our natural environment is by far the most cost-effective means of addressing climate change both in terms of carbon reduction and offsetting, but also in terms of dealing with the inevitable changes which it is clear our environment is undergoing. We can either plant trees and support our farming communities to provide floodplains upstream on rivers, or we can spend £100's of millions of pounds trying to prevent them flooding our towns and cities.

4.0 Timeline for review of NPF and The Housing Technical Discussion Paper

We note that housing land allocations will now be set in NPF for each LA. We continue to have concerns about how this will operate in practice and have set them out below. Of more practical concern is the inference that all future LDP reviews will therefore be tied to the review of NPF. This would suggest that all LDP's will need to be prepared in a window after the adoption of NPF. While there could be clear benefits to this, there are massive resource implications on all the key agencies, public sector bodies and other groups involved. As an example, our Habitats Regulation Appraisal (HRA) is approved by Scottish Natural Heritage (SNH) before submission to examination. This would suggest that all the LDP's across the country will require to be assessed by SNH in a very short window. This would be the same for Transport Scotland, Scottish Water and even more significantly for the Centre for Housing Market Research who may be required to assess multiple Housing Needs and Demand Assessments from the same area. The overriding concern here is of LDP's running out of date. While these are practical issues they are issue that must be addressed now while there is time to work our solutions before it begins to delay development across Scotland.

4.1 Context

The Housing Technical Discussion Paper (the Paper) is the first document produced by Scottish Government in support of the emerging National Planning Framework 4 (NPF4) and is an opportunity to engage on the subject of housing land. The objective is to provide clarity as to the quantum of housing land required while increasing streamlining and transparency of engagement. The Scottish Government can request support in terms of evidence to inform NPF4's housing land targets (HLT).

4.2 Developing Housing Land Targets

The Paper suggests that a Housing Need and Demand Assessment (HNDA) would be undertaken at a national level by the Scottish Government which would set individual HLTs for each Local Authority. While it is understood that the conversation around housing land for NPF4 is at an early stage the Paper raises numerous questions and resource implications.

The streamlining of the planning system through setting HLTs at a nation level and by also the gate check of future LDPs would seem to be counterintuitive. If Local Authorities are to be asked to comment on HLTs in any draft version of NPF4 or be a party to the development and setting of the HLT they will:

- need to be a key stakeholder in the national HNDA process; or,
- provide alternative proposals or scenarios which will mean producing their own parallel HNDA in order to have a robust evidence base to challenge HLTs. The NPF's HLTs would be open to debate and amendment in the Scottish parliament therefore as much evidence as possible should be available for MSPs for consideration; and,
- produce or refresh a HNDA to support the review of a LDP at the point of Scottish Government gate check.

This would seem duplication for Local Authorities of considerably resource intensive work and that the evidence which results from this may not be given the weight of consideration that it warrants.

4.3 Housing Market Areas

Setting HLTs at a Local Authority level would seem to ignore the reality that some Local Authorities share Housing Market Areas (HMAs). HMAs, which consider travel to work areas, are not defined by where one Local Authority ends, and another begins. Rather they should consider where people work and wish to reside. Aberdeen City Council and Aberdeenshire Council share the Aberdeen Housing Market Area which reflects the need and desire of residents of both Authorities to live and work in a transboundary manner.

4.4 Financial Considerations

The NPF's HLTs will not be set a tenure level. This will need to be resolved through Local Housing Strategies and LDPs. It is a missed opportunity for the setting of a bellwether for both the SG and LAs to plan both land allocations and capital investment for non-market housing needs. The NPF would seem to be moving towards the direction of a National Development Plan and it would seem sensible to align long term capital investment with affordable housing targets.

4.5 Engagement and Consensus

The Paper suggests that should a LA not agree with the HLT set in the draft NPF that it would need to provide an alternative scenario agreed by the Housing Market Partnership and Homes for Scotland/the Development Industry. Any scenario developed by either SG or a LA is based on the HNDA tool. The HNDA seeks to understand housing need across tenures with a focus on affordable and non-market housing. The delivery of affordable housing is not the primary function of the Development Industry.

The draft NPF HLTs will not consider the tenure and quantum of affordable housing. If it were to consider this, it should be reflective of deliverability and funding available and not dependent on the market sector to make up shortfall. HFS has promoted the narrative that under delivery in the AHMA is a result of an insufficient land supply and not market forces. And yet there has never been more housing land allocated in the AHMA.

Should a LA undertake a HNDA which results in a HLT for its area lower than that of the proposed NPF it is unlikely that an agreement with HFS on alternative scenarios would be reached. The consideration of such alternative scenarios would have previously taken place through the Examination of a Strategic Development Plan in a transparent and impartial manner.

The alternatives proposed by The Paper would not seem to be streamlined, considerate of a Local Authority's agency to produce an independent LDP or understand that the HNDA tool was designed for understand housing need across all tenures.

	Policy and Infrastructure Proposal
5.1	Policy Topic Areas
5.2	<p><u>Introduction.</u></p> <p>While as noted above, ACC welcomes the inclusion of polices within NPF to provide statutory guidance in decision making, as well as providing some consistence across Scotland, we do nevertheless have some concerns. We must caution against any erosion of the Planning Authorities ability to set policies within our local context. Planning Authorities must continue to have the ability to set the necessary polices to meet the challenges they face either locally, or regionally though Regional Spatial Strategies. The importance of this local policy setting agenda is made even more acute, when you consider the different and often contradictory challenges that Planning Authorities, and in broader terms Local Authorities can face even within their administrative boundaries. This could also be compounded with Local Development Plans moving to a 10 years cycle. As recent history has shown, the economy can change significantly in a short time frame and Planning Authorities need to be able to support the local economy where they can.</p> <p>As an example, to support our City Centre Masterplans (CCMP) aim of increasing the number of people living in the City Centre, and to complement our Conservation Area Regeneration Scheme (CARS), ACC recently introduced an Affordable Housing wavier within our City Centre. A downturn in our economy since the polices were set in our Local Development Plan was making development in the City Centre unviable. While the assessment of development viability is always an option, for many of the property owner's in the city centre who are not developers, this process was too complex. Our ability to set, or in this case temporarily suspend a policy allows the Planning Authority to support other important initiatives by ACC, and to maximise both public and private investment. An overarching policy within NPF which didn't allow us to make these local decisions or presented an opportunity to appeal against a locally set policy, could weaken our ability to deliver the vision of our future Local Development Plans.</p> <p>That said we would greatly welcome clear policies, or policy support, for national objectives which can support or replace the need for local policy setting, some examples are set out below. Furthermore, this would remove the often laborious process of every planning authority in Scotland having to justify nationally set objectives through each of their LDP examinations. An example of this is the Low and Zero Carbon Generating Technology policy required in LDP's from the Climate Change Act. While this policy is generally supported through examination, every Planning Authority appears to take a different approach to its application and is therefore often required to justify it though examination. This is costly for Planning Authorise and leaves the development industry understandably frustrated. This is an example of a national policy objective that should be set in consultation with Planning Authorities and the development industry at a national level, and while clearly a building standards issue, if required, a planning policy could be included in NPF. This would set a</p>

	<p>clear national picture and would help allow national Carbon Emissions to be calculated with greater accuracy while getting economies of scale from having a national approach. We have further comments below on this policy.</p>
<p>5.3</p>	<p><u>Health and Wellbeing</u></p> <p>Ensuring physical and mental health relies on creating environments that foster better health, have reduced inequalities in wellbeing and which allow people to live active, engaged, independent and healthy lifestyles. Planning is of particular importance for reducing the burden of unhealthy environments:</p> <ul style="list-style-type: none"> • Access to safe, convenient active travel and good neighbourhood design promotes physical activity, enhances social connections and strengthens mental health. • Compact neighbourhood design with walkable local facilities and public transport accessibility allows car free access to services, amenities and employment which increase health benefits and reduces the impact of poverty • Increased access to natural and planned open space with varied and safe opportunities to play and meet has a positive impact on physical activity levels and mental health. • A mix of good quality affordable homes of all types and sizes to meet differing needs increase health benefits and reduces the impact of poverty. • Protection from environmental hazards; increasing air and water quality, reducing noise pollution, and reducing carbon emissions has a positive impact on physical and mental health. <p><u>Aberdeen City Council's approach:</u> Aberdeen City Council (ACC) have taken a proactive approach to health and wellbeing in our Proposed Local Development Plan 2020. The Planning (Scotland) Act 2019 makes explicit reference to health and health impact assessments. In many ways taking planning back to its origins, and while health has always played a part in the planning system, this clear reference is a welcome one. In producing the Proposed Plan, ACC have taken a collaborative approach and established a health and wellbeing working group with Aberdeen City Health and Social Care Partnership, and Aberdeen City Council's inhouse teams from housing strategy and social care.</p> <p>Health and wellbeing is at the forefront of the Plan, and a twofold approach developed. The Public Health Priorities for Scotland were embedded within the Health and Wellbeing chapter of the Plan, and a health in all policies approach has been taken. At local and international level, Aberdeen City Council's Local Outcome Improvement Plan and the United Nations Sustainable Development Goals was also paramount in developing the Proposed Plan. Policies were co-designed with our health and wellbeing working group over a number of workshops, and specialist advice was taken from West Lothian NHS and West Lothian Council on their existing planning guidance on health impact assessments via phone call and a sit down meeting with the working group.</p>

There will be further involved of Aberdeen's health and wellbeing working group to develop and finalised Aberdeen City Council's planning guidance on health impact assessments. It is important that any policy or policy support included in the NPF4 is codesigned with Planning Authorities and we would welcome the opportunity to be involved in that process.

What we would like NPF4 to do:

To support health and wellbeing in the planning system NPF4 should:

- **Place Standard**
We recommend that the Place Standard should be used as the basis of evaluating developments and this should be imbedded in the planning process.
- **Health in all polices approach**
This approach would support a broad range of government objectives such as reducing obesity, alcohol consumption, better diets, while also reducing emission, car use etc through active travel.
- **Health Objectives**
Set clear planning based health objectives. Scottish Government Public Health Priorities for Scotland could be the starting point for drilling down to planning focused health objectives.
- **High Level Health Policy**
Have a general policy on health and wellbeing, but allow for further development.
- **Health Impact Assessment**
Support Health Impact Assessment (HIA) by giving guidance on the general parameters of a HIA and what should be included, such as is given by key agencies for Environmental Impact Assessments. This guidance should be codesigned with Planning Authorities and we would be happy to be involved in that process.
Support HIA's statutory nature.
- **Low Emissions Zones and No Emission Zones**
Support Air Quality polices around Low Emission Zone.
- **Active Travel**
Support active travel more explicitly. Should a development be refused because it doesn't have active travel links.
- **Space Standards**
Space standards for internal room sizes and external private and public space will ensure homes can be adapted to suit the ever-changing needs of Scotland's population and cope with changes in demographics. This will ensure homes are more sustainable in terms of embedded energy and are able to adapt to changing requirements. Access to public and private open space also has positive impacts on physical and mental health, access to daylight has a positive impact on mental health.

5.4 **Climate Emergency**

In order to meet the Scottish national objective of being Net Zero by 2045 it is crucial that the planning system plays its part. To do this NPF4 needs to support Planning Authorities in changing the focus of development across Scotland. From site selection to the design of buildings, the focus must now turn to reducing carbon emissions. Many of the changes required also support other national and local objectives, and the broader Place agenda. Nevertheless there are several areas, particular around energy where NPF4 can help to drive change.

Decarbonising Our Energy

Fuel (EV charging and Hydrogen)

Scotland's climate change legislation setting a target for net-zero emissions of all greenhouse gases by 2045 will require changes across our whole society – the way we manufacture goods, the way energy is generated, how we heat our homes and businesses, how we use our land and the way we travel.

Aberdeen City Council is preparing an EV Strategy (due late 2020) which aims to encourage further uptake of electric vehicles and expansion of the infrastructure.

Rapid growth in global interest in hydrogen is driving innovation and scale. Many countries now have national strategies for hydrogen and Scotland is in danger of falling behind unless it steps up its activity. ACC have taken a proactive approach and is one of the few cities in the UK that has prepared a Hydrogen Strategy & Action Plan (2015-2025) for the city region. This strategy has objectives and actions covering vehicle deployment, renewable hydrogen, refuelling infrastructure, non-transport applications of hydrogen, supply chain development, communication & education and policy & regulation. In the lifetime of the strategy Aberdeen has achieved key milestones: the city now has 52 hydrogen vehicles, with 39 more expected in 2020 and there are 2 hydrogen refuelling stations that are available to the public.

What we would like NPF4 to do:

We would welcome clear national policies on the following:-

- **Alternative Fuel Strategies**
Support hydrogen strategies and EV strategies more explicitly and give guidance on the general parameters of what should be included. This national support will help LA, Developers and Utility providers to plan for the future.

- **High Level Electric Vehicle Policy**
 Have a general policy supporting EV charging infrastructure. Set thresholds expecting all developments, residential and non-residential, over a certain sizes to include provision of EV infrastructure. We would suggest all major developments would be a good threshold. Require new or expanded “filling stations” to include EV and/or Hydrogen fuelling points as standard.
- **High Level Hydrogen Policy**
 Have a general policy supporting various uses of hydrogen as an alternative fuel. These include but are not limited to transport (vehicles, trains and ferries), heating (boilers in homes, or through a centrally distributed gas heating network), cooking, electricity and export. Allow for further development of the policy nationally and locally. Explicitly support generation of green hydrogen for transport uses.
- **Hydrogen Refuelling Stations**
 Support the roll-out of hydrogen refuelling stations (HRS) across the country.
 Encourage local development plans to allocate land in strategic locations for hydrogen refuelling stations.
- **Hydrogen Projects**
 Support the Aberdeen Hydrogen Hub Project. This project seeks to:

 1. Provide a cost-effective supply of green hydrogen to the market to support existing and proposed transport projects (this includes hydrogen generation from offshore wind and hydrogen storage).
 2. Expand in the short to medium term to connect to larger volume utilisation of hydrogen – trains, trucks and marine
 3. Economy-wide roll-out of hydrogen: further low carbon and renewable energy sector development and expansion of local skills base and supply chain.
- **Low and Zero Carbon Generating Technology**
 A clear national policy for this topic which links in with building standards. This should support particular types of technology to allow developers to get scalable solutions. Air/Ground source heat pumps, Solar and Bio-Mass are all well tested technologies already in use in Scotland.
 A national policy would also remove a lot of the complexity from the examination process in relation to LDP’s.
- **Battery Storage**
 Battery Storage developments in Scotland under 50 megawatts require planning permission. A policy supporting these developments would be extremely useful given the growth in wind energy. Any policy should identify what criteria are necessary to make a development acceptable:- such as suitable land use classifications, environmental impacts and impacts on residential amenity.

- **Heat Networks**

These provide one of the most deliverable and scalable energy solutions for urban areas. The Heat Network Bill Scotland is expected to impose regulations on heat networks and standards for heat network providers and operators, and we welcome this clarity.

1. To support this, we would recommend a national heat network policy which supports Planning Authorities in requiring heat networks within new development. Aberdeen City Council through the Scottish Cities Alliance helped to draft a policy which could be used as a template. A copy is attached to this submission in Appendix 2.
2. Amended Permitted Development rights are required around the installation of heat network pipes to align heat network operators with other utility providers.
3. This policy, irrespective of whether it is included NPF4 or simply supported in LDP's through NPF4, requires centralised expertise to support planning authorities to assess proposed heat network schemes. A proposal for this was also included in the work of the Scottish Cities Alliance, included in Appendix 2.

5.5 **Protecting our Biodiversity**

While the Climate Emergency has understandably gotten significant focus over recent years, the ongoing damage and loss of our natural biodiversity is similarly alarming. Whether this is direct loss through the building of new developments or subsequent "development creep" through house extension or hard surfacing of green spaces, this loss and fragmentation is having significant impact on our flora and fauna. As mentioned earlier our natural environment is by far the most efficient and cost-effective way of managing both climate change and climate mitigation. It is therefore more important than ever that we protect and enhance it. Including the protection of biodiversity within NPF4 either as a policy or as support for

What we would like NPF4 to do:

A policy or supporting statement should include:-

- **Protecting Biodiversity.** There should be strong support for developments being biodiversity positive wherever possible, not simply mitigating a loss of biodiversity. As an example this should include:-
 1. All planting should be native, insect and particularly pollinator friendly.
 2. Open spaces should include areas of naturalised open space.
 3. Developments should not fragment habitats and wherever possible should try to join up existing habitats through green networks and habitat corridors.
- **Tree Cover.** New developments should seek to increase the nations tree cover with native species and limit the loss of existing particularly

	<p>mature trees. This should be supported by stronger protection for existing trees through NPF and in particular the appeals process, and more support for the use of Tree Protection Orders (TPO).</p>
<p>5.6</p>	<p><u>Place</u></p> <p>Placemaking has been at the forefront of Scottish Planning for many years and should continue to be so. Place has both tangible and intangible connections to people. Successful places are linked to improving the health and wellbeing of people, improve quality of life, flattened out social inequality, helps to mitigate against climate change, improve biodiversity, and ensure sustainability for current and future generations.</p> <p><i>What we would like NPF4 to do:</i></p> <p>Cultural Heritage (built environment, landscape)</p> <p>A national policy, or strong support for local polices in LDP's to protect and actively seek to enhance Scotland's built heritage and architecture. Scotland's architecture and landscape is fundamentally intertwined with our identify and our built and natural heritage should be protected. A policy or supporting statement should include:-</p> <ul style="list-style-type: none"> • A brownfield first policy. Focusing on redevelopment and rejuvenation of Scotland's existing brownfield sites, including our town and city centres. This will have a significant impact on the quality of our place and support struggling areas. • Stronger support for town and city centres. Out of town retail developments should only be acceptable in exceptional circumstances. The mix of uses within a town centre is fundamental to ensure vitality and vibrancy. Rejuvenating and transforming existing areas makes better use of embodied energy, and existing infrastructure and services, than developing greenfield sites. If Scotland to achieve a net zero carbon emissions target by 2045, there needs to be serious consideration given to where development takes place. • Reusing and renovating our existing stock needs to be the priority. • Protecting Character. A strong emphasis on protecting character, building and materials which contribute to sense of place - the 6 principles within Historic Environment Scotland's Policy for Scotland outline what is expected. <p>Placemaking (Demographics)</p> <p>Place if fundamental to everting the planning system aims to achieve. Developing a strong sense of Place will help to achieve a health, vibrant and sustainable community and a strong economy. To achieve this housing, particularly a mix of good quality sustainable housing, is crucial. A policy or supporting statement should include:-</p>

	<ul style="list-style-type: none"> • A requirement for a mix of housing within development. Places which offer a variety of housing types and models for multi-generational living, and housing which suits people in a variety of stages of life allowing them to remain within the same community. • Support for appropriate densities. Appreciation that density varies across a development, city or region. While increasing density must be a key objective to reduce the loss of agricultural land, density must be set within its local context. • Climate Mitigation and Adaption. Our climate is changing and while we must seek to mitigate these changes through more sustainable and low carbon developments, we must also ensure they are adapted to our changing climate. Better integration of climate mitigation and adaptation measures in redevelopments and new designs, with expected interventions, e.g. open space, green walls, de-culverting water courses, solar shading, permeable surfacing, food growing, larger gutters and grey water capture, biodiversity etc • Adaptable places. All new developments should include electric/hydrogen charging, broadband and modern technology for delivery of services, live-work units and adaptable floorplan buildings.
5.7	<p><u>Infrastructure delivery</u></p> <p>Infrastructure delivery is fundamental to the delivery of successful places. With greater pressure on national and local government finances developments must pay for the infrastructure required to deliver them. Doing so will also focus development on brownfield and infill sites where infrastructure already exists. A policy or supporting statement should include:-</p> <ul style="list-style-type: none"> • Infrastructure Levy. Stronger support for infrastructure delivery including support for regional/local infrastructure levy. • Development Viability. Developments which are not financially viable or which cannot deliver the required infrastructure should not be supported if they. This must be considered from the initial site allocation in the LDP through to the approval of planning permission. • Land Value Capture and Compulsory Purchase. Land value capture and compulsory purchase should be considered as a way of delivering the right development in the right location. Land Value Capture can help deliver the required infrastructure while separating it from the final development process. This may however only work in the context of the option of Compulsory Purchase.

5.8 Hierarchy of Centres and Retail

Retailing is changing across the country for a variety of reasons including internet retailing, business rates, big box retailing, suitability of city centre units, servicing and access issues etc. Across the country, in both cities and towns, vacant units and 'To Let/May Sell' signs are common. This can be further exacerbated by reluctance for retailers to move into a locality where the trading environment is seemingly poor. Vacancies in turn have a negative impact on the setting and experience of a city or town centre for residents and visitors.

Aberdeen City Council (ACC) have revised their policy position with regards to the primacy of retail in the city centre through the Proposed Local Development Plan 2020. In producing the Proposed Plan ACC undertook a retail study refresh which detailed retail and city centre use trends with maps produced of uses in the city centre. Whilst we continue to recognise the importance of a hierarchy of centres, and associated sequential approach, the Proposed Plan has embraced the trends away from traditional retailing and in line with the City Centre Masterplan and Delivery Programme promotes uses which encourage vitality, viability and vibrancy of place. A positive policy position with regards to encouraging a broader mix of uses in the city centre and active frontages recognises the shift in retailing patterns to support a vibrant city centre, encourages a repopulated city centre with reduced need to travel and with knock on effects on sense of place, public realm / streetscapes all being key to attract further inward investment.

What we would like NPF4 to do:

- Continue to support hierarchy of centres;
- Continue to direct significant footfall generating development to appropriate locations sequentially;
- Support a balanced approach to allow land use planning to create the right physical and policy environment for further development proposals to achieve development of quality places and enhance the social, economic, environmental and cultural attractiveness of a place.

A policy or supporting statement should include:-

- **Agent of Change.** Imbed Agent of Change principle in NPF4 to protect existing uses but also ensure appropriate amenity of new uses. This will be crucial to achieve a broader mix of uses in city centres.

Name of proposed national development	Scotland's Energy Transition Zone
Brief description of proposed national development	A dedicated Energy Transition Zone in the area immediately adjacent to the Aberdeen Harbour South expansion where there will be a presumption in favour of the development, production, assembly, storage and/or distribution of infrastructure required to support energy transition, including renewable energy related industries (offshore wind, tidal, hydrogen and solar).
Location of proposed national development (information in a GIS format is welcome if available)	Adjacent to the Aberdeen Harbour South Extension which is included in NPF3.
What part or parts of the development requires planning permission or other consent?	Developments within the proposed site allocations will require planning permission.
When would the development be complete or operational?	Development will come forward as opportunities in the sector present themselves, The first phase will coincide with ScotWind licensing and developments in 2021/22.
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	Yes, both an Energy Transition Zone Policy and Site Allocations are included in the recently approved Proposed Aberdeen Local Development Plan 2020
Contribution of proposed national development to the national development criteria (maximum 500 words)	<p>The rationale for the development is both to deliver environmental and economic benefits in response to the climate change targets. It positions Scotland and Aberdeen as a world leader in the energy sector, and a n economic driver for the city, region and Scotlan as a whole. In the current 'perfect storm' of exposure to the effects of Covid-19 and a substantial fall in oil barrel prices to \$22, the city's recovery phase will not be like previous downturns and the imperative to develop the zone is even more compelling, coinciding with the oil and gas sector consider new sustainable and low/zero carbon energy. Aberdeen is ideally placed to capitalise on new energy transition opportunities in safeguarding the region's economic future. Grasping the emerging opportunity is critical to ensure that Aberdeen, and therefore Scotland, does not lose its competitive advantage against other cities around the North Sea.</p> <p>Energy transition refers to the global energy sector's shift from fossil-based systems of energy production and consumption — including oil, natural gas and coal — to renewable energy sources like wind and solar. It also refers to the use of hydrogen as an energy vector for the use in transport and heat.</p>

Scotland's 'Energy Transition Zone' ('ETZ') is not a universal term, however, in this context it is a vehicle to promote Aberdeen as a city region with strong credentials and expertise in offshore and subsea development. The Zone prepares the necessary sites and infrastructure required to support future offshore development.

Aberdeen City Council, Invest Aberdeen and Opportunity North East commissioned a Feasibility Report to review the potential to accommodate a major international energy transition zone within an area of search around St Fitticks, land south of Torry, Altens, East Tullos, the Bay of Nigg and land around Aberdeen South Harbour in response to the commercial opportunities that energy transition will bring. In particular, in offshore renewables and subsea engineering -an area of strength in and expertise for Scotland.

Much of the activity is centred around existing ports, as the rise on offshore wind and the need to land significant kit for offshore manufacture and assembly means that efficient marine access is intrinsically involved in energy transition. Common themes include a requirement for relatively large areas of flexible quayside space, new land accommodate this growth and good road, rail and freight transport connections are key.

Aberdeen is ideally placed, geographically, to lead on the Crown Estates Scotland's next Offshore wind leasing round for the benefit of energy transition within the City Region and beyond. The city region already provides the company base, expertise and skills that are immediately transferable to this sector, and the infrastructure (including the new South Harbour), road and rail links are in place.

The City does, however, need land that can accommodate these uses and / or investment in existing industrial land that can support this transition. Scotland's Energy Transition Zone has identified some 90Ha of new net development land.

A dedicated Energy Transition Policy has been created in the proposal Local Development Plan 2020 ('LDP') for the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries; this includes offshore wind and hydrogen.

The Energy Transition Zone has been developed to establish a designated area south of the city that promotes new investment in a defined 'special economic area'. This will facilitate the expansion of an energy transition cluster in the immediate vicinity of Aberdeen Harbour South expansion focusing on two major opportunities for the Scottish economy: offshore wind and hydrogen. The location of the planned zone capitalises on the new marine competitive advantage the harbour expansion offers Scotland and includes shore to ship electrification; the existing energy supply chain located in the north east of Scotland; and the supporting technology and innovation environment provided by two universities and the recent work by industry net zero solutions in the offshore oil and gas sector.

The initial phasing within the zone involves two transformational projects that could ultimately deliver a climate positive impact. They focus on integrating world class

subsea engineering expertise to immediate opportunities in Offshore Wind Production and Manufacture; and Hydrogen Power Production, Storage and Distribution, and developing a world class centre of expertise, immediately adjacent to at least three ScotWind East Region sites. Alone, they could deliver a 25+ year opportunity in operations, maintenance and manufacturing related to these developments, and provide a progression from the European Offshore Wind Deployment Centre, and subsequent floating windfarm development out of Aberdeen.

At the same time, a hydrogen production, storage and distribution network of green hydrogen and a global export hub within the zone is an ambitious project that builds on the phasing of H2 Aberdeen. It extends the provision of hydrogen powered transport to other modes and users, housing and ultimately export, capitalising on offshore wind opportunities in the immediate vicinity. The Aberdeen City Council Local Development Plan has responded with a new Energy Transition Zone policy and allocation of certain sites to deliver initial phase around ScotWind developments.

Supporting information is provided in Appendix 1.

Name of proposed national development	Aberdeen City Region Water Management and Flood Alleviation.
Brief description of proposed national development	<p>Water management scheme for the Aberdeen City Region stretching from the Cairngorm National Park through Aberdeenshire to Aberdeen. The purpose of the scheme to combine and manage :-</p> <ul style="list-style-type: none"> • The Potable Water Supply for Aberdeen City Region (500,000 residents) • The Coastal Flood Protection Scheme • City wide Drainage Scheme (80% of regions flood risk is in Aberdeen City) • River Dee and River Don Strategic Flood Management Programs
Location of proposed national development (information in a GIS format is welcome if available)	<p>Various Locations across the region but significant elements are:-</p> <ul style="list-style-type: none"> • River Dee and Catchment (includes Aberdeen City and Aberdeenshire local authority area, and Cairngorm National Park authority area). • River Don and Catchment (includes Aberdeen City and Aberdeenshire local authority area, and Cairngorm National Park authority area). • Aberdeen Coastal Defences • Aberdeen City Drainage System
What part or parts of the development requires planning permission or other consent?	<p>Various aspects including:-</p> <ul style="list-style-type: none"> • Possible reservoir to deal with water supply (including desalination) increasing security of supply and resilience • Coastal Defences • Various flood mitigation measures along the Dee, Don and coast
When would the development be complete or operational?	<p>This would depend on support and funding available. Some aspects could be completed relatively quickly others will take a significant period of time. All will involve multi agency support.</p>
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	<p>No – Limited work is underway with SEPA and Scottish Water looking at Aberdeen City from a flooding perspective, but this only looks within the administrative boundary and does not include the catchment. No work currently underway to address the potable water supply to the City Region.</p>

Contribution of proposed national development to the national development criteria (maximum 500 words)

The North East's river and coastal systems are intertwined through geography and development which has modified those systems. The River Dee flows across two Local Authorities and the Cairngorms National Park. The Coastal system runs along Aberdeen City Council and Aberdeenshire and offers connections internationally through Aberdeen, Fraserburgh and Peterhead harbours. The systems provide a range of tangible benefits (e.g., freshwater supplies, habitat for economically significant species, mitigation against extreme weather events, tourism and recreation opportunities) and intangible benefits (e.g., physical and mental health) which both directly and indirectly contribute to human well-being.

In terms of its national significance the River Dee supplies the whole of Aberdeen City and over half of Aberdeenshire's domestic water supply (approximately 375,000 people) and for businesses, industries and the agricultural sector. It is therefore a key component to the North East's infrastructure. At present this water supply is reaching capacity and any further abstraction will negatively impact on the rivers SAC status and as such will be unacceptable to Scottish Natural Heritage. An inability to deliver additional freshwater capacity will prevent the economic growth of the north east and will have a significantly detrimental impact on one of the most important Salmon rivers in Scotland. Aberdeen Harbour and Aberdeen Harbour South are of vital significance to the City Region's economy and its place in the energy sector and driving the energy transition toward NetZero.

There is now an opportunity to enhance the services these natural systems provide through improving; the quality and scale of their habitats and therefore our resilience to extreme weather events, sea level rises and coastal erosion. Such improvements would offer numerous benefits:

- An opportunity to manage the cumulative flow of the River Dee in order to ensure water supply security through extended droughts and extreme increases in flow. Water supply security should be future proofed now before the effects of climate change become acute. New infrastructure in the form of reservoirs or the capturing of storm water runoff for alternative use needs to be explored to guarantee the long-term water supply security for the North East.
- An increase in the ability of the River Dee system to mitigate against extreme weather events through removal of modifications to the river's floodplains, rejuvenation, expansion, and rewilding of riparian areas. This would have the benefit of expanding green networks and spaces, improving natural habitats and reducing groundwater runoff.
- Managed retreat from rising sea levels through the reinstatement of coastal saltmarshes and wetlands. Managed retreat not only has benefits for coastal flooding alleviation and protecting property from catastrophic sea wall breaches, but it has considerable benefits for biodiversity too. Once established, salt marshes are a great habitat for wildlife. The close proximity of the Donmouth Local Nature Reserve along with the Ythan Estuary and Forvie National Nature Reserve a few miles up the coast, there are

populations of wildlife close by that would soon expand their range into the newly formed habitats. Such an area so close to the City centre would increase wildlife tourism.

- Wetland soils are globally important carbon stores, and natural wetlands provide a sink for atmospheric carbon dioxide (CO₂) through ongoing carbon accumulation. Recognition of coastal wetlands as a significant contributor to carbon storage (blue carbon) has generated interest into the climate change mitigation benefits of restoring or recreating saltmarsh habitat.

A coordinated approach on would lead to increases in; water security, climate change resilience and biodiversity. A plan to protect the city's shoreline, people, place, historic assets, and natural environment from erosion and coastal inundate through encouraging natural coastal defence where possible.

Name of proposed national development	Aberdeen City Region Transport Network. Improved International, national and inter regional connections.
Brief description of proposed national development	<p>Transformational change in strategic transport connections within the north east and connecting the region to the Central Belt, rest of the UK and Europe.</p> <ul style="list-style-type: none"> • Improved rail links Aberdeen to Central Belt • Regional commuter rail services (Montrose - Aberdeen – Inverurie, with additional local stations) • Improved surface access connectivity to Aberdeen International Airport via public transport • Regional Rapid Transit (Ellon, Inverurie, Westhill, Stonehaven to Aberdeen, with complementary infrastructure, including Park & Ride site at Portlethen) • Sea freight and ferry connections to Orkney and Shetland.
Location of proposed national development (information in a GIS format is welcome if available)	Widespread across the region.
What part or parts of the development requires planning permission or other consent?	<p>High Speed Rail - A development within one or more of the Classes of Development described is designated a national development.</p> <p>Rapid Transit - depending on the scale of physical transformation required, planning permission and compulsory purchase are possibilities. This will become more apparent as the detail of projects advances. New rail stations may also require planning permission and/ or compulsory purchase.</p>
When would the development be complete or operational?	2026-2040
Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.	<p>Rail - Improved rail links Aberdeen to Central Belt NPF3 (pg76)</p> <p>The classes of development support the development of a high-speed rail network to Scotland. This aims to provide a more efficient, lower carbon travel option to connect Scotland with London. A link between Edinburgh and Glasgow as an initial phase would realise early benefits from the project, and aims to release</p>

	<p>capacity on the existing rail network serving cities north of the Central Belt.</p> <p>Regional Transport Strategy All</p> <p>Rail connections and Park & Ride site at Portlethen originally identified in STPR and confirmed through Aberdeen City Region Deal; Aberdeen Rapid Transit, connectivity to airport identified in Strategic Transport Appraisal and key elements of Nestrans' Regional Transport Strategy 2040.</p> <p>North East Freight Action Plan.</p> <p>Aberdeen City's Local Transport Strategy supports improved rail connections to and through, as well as transport interchange for both bus and rail, and infrastructure improvements such as bus priority to 'lock-in' the major investment of recent years and reverse the decline in bus patronage. The City's Local Outcome Improvement Plan also recognises the importance of public transport to those who live and work in the City and opportunities to make this more attractive. The Air Quality Action Plan and emerging Low Emissions Zone (LEZ) rely on measures to encourage more sustainable travel for everyday trips. Aberdeen City Council is already in receipt of funds from Transport Scotland for the LEZ, and the City Region Deal, funded by the local Councils, private sector, Scottish and UK Governments.</p>
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Contribution of proposed national development to the national development criteria (maximum 500 words)

Increasing the use of public transport through high speed rail links to and from Aberdeen to Inverness, the central belt, rest of the UK and Europe, and investing in Aberdeen Crossrail will release wider capacity on Scotland's rail network, will ensure a reduction in emissions from private and road freight vehicles, will enhance commuter services and connections into intercity communities in the corridor, and coupled with progressive decarbonising of transport networks will contribute to meet Scotland's net zero target. Faster and better rail links will improve connectivity and reduce perceptions of remoteness, provide an alternative to car and air travel, which will encourage mode shift, have environmental benefits, and enhance the productivity of business travel, which is beneficial to inclusive growth. Aberdeen Crossrail may be suitable for a zero-carbon hydrogen trains pilot, helping the Scottish Government's aim of decarbonising the railways and contributing to the climate change criterion.

Lower emission rates and reduced reliance on private car ownership and road freight travel will help to enhance poor air quality, therefore ensuring better health and wellbeing for people. Rapid rail movements support inclusive growth by reducing journey times.

Rapid Transit will offer transformational change to the public transport, encourage modal shift, reduce carbon emissions and other pollutants and utilise road space more effectively. Bus services provide the most effective and efficient form of motorised road transport and are essential in providing socially-necessary transport for people without access to a car, which is over a third of households in some parts of the north east. A tram-like scheme with complementary priority infrastructure and a pedestrian/cycling/bus only will be a central tenet in rejuvenating Aberdeen City Centre, through supporting living the city centre, increasing air quality and ensuring public to access the facilities on offer in North East's regional centre. Better access to rapid transit will address social exclusion issues and ensure better accessibility to priority areas, such as health services. Rapid Transport will support people, sustainability and quality of life contributing to modal shift and improving place.

The harbours in the north east have a long history of supporting the economic viability of the area, and have continued to have a vital role as freight and ferry hubs linking to the islands and international locations. Support for coastal and promoting passenger and freight movement by short sea shipping routes will again support people and inclusive growth by ensuring quality of life and enabling more equal access to services and facilities. Increased short sea shipping routes will remove road freight and may help to meet the net zero emissions target.