

30 April 2020

Area 2-F (South)
Planning and Architecture Division
The Scottish Government
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Dear Sir/Madam

Scottish Ports Group Submission to the National Planning Framework 4 Call for Ideas

Thank you for the opportunity to be involved in the shaping of Scotland's fourth National Planning Framework (hereafter referred to as NPF4). This response is made by the British Ports Association (BPA), on behalf of the Scottish Ports Group. The BPA represents the overwhelming majority of ports in Scotland. The Scottish Ports Group is part of the BPA but has its own defined network, activities and publications.

The ports sector in Scotland and throughout the UK is financially and strategically independent of government. Investment decisions are based on market need and changes in demand. Ports ask for very little from the Government but they do rely on a stable economic and policy framework, modern transport infrastructure and, of particular relevance to this consultation, an efficient planning system.

Scottish ports produce £9.9bn in turnover and £9.6bn indirectly in the supply chain and induced wider spending. They also provide economic activity and employment, often in areas of deprivation. Scotland's ports keep supermarket shelves stocked, facilitate energy production and ensure that the construction industry has materials for development, to name just a few of their functions. Ports play a significant role in securing a prosperous Scotland – so we would expect the considerations of the National Planning Framework 4 to reflect this.

Ports speak to many of the themes of NPF4. With regards to addressing climate change, the industry supports a rapidly growing offshore renewables sector, as well as offering low-carbon freight transport, compared to other modes. Prosperity derived from port activity is often shared amongst many, though job creation and boosting the economy of rural communities. For example, by ports acting as the cornerstone for the marine tourism and cruise sectors in Scotland, many associated sectors benefit.

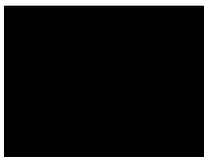
Outlined in the engagement document for NPF4 are considerations of how to boost rural, coastal and island communities and how we could unlock the potential of vacant and derelict land. The BPA is currently preparing a response to the UK government's consultation on Freeports, which features discussion of a streamlined planning framework. In our response, we are calling for the chosen Freeports model to include a terrestrial and marine planning consents system that supports fast-track planning around ports, which we echo here. We are also calling for the government not to limit their ambition to just ten Freeports, so all ports, in any part of the UK, can benefit from this. We believe this policy can draw investment into our coastal communities and stimulate development on brownfield sites that are either next to or inland from a port site.

Furthermore, in continuation of our suggestion that the ports industry needs to see planning systems and consenting processes that are more supportive of sustainable development; we ask that you consider further integrating transport connectivity into the national planning framework. Although ports are financially independent of government, they do rely on publicly funded road and rail infrastructure to facilitate goods, passengers and visitors. Within NPF3, Scottish ports valued the consideration of 'connected places', which mentioned Cairnryan, Peterhead, Stornoway, Scapa Flow and Hunterston directly. NPF3 also included a list of priority infrastructure projects, which included the Nigg Bay development at Aberdeen Harbour. The Scottish Ports Group is calling for further development of this approach, which considers a network of projects across Scotland.

We therefore direct you to appendix A attached below, which lists specific infrastructure needs across the country, collated by the Scottish Ports Group. Within the development of NPF4, we see a potential to form a port connectivity strategy for Scotland, built into this planning framework. This would allow Scottish ports to act as efficient gateways by better connecting them to wider freight networks and further aid the future prosperity of Scotland.

We look forward to submitting a response to the consultation on the draft NPF4 document. We hope our initial comments are of help and we are always happy to supply further background or to meet with the planning team to discuss this.

Yours faithfully,



Phoebe Warneford-Thomson

Policy and Economic Analyst, British Ports Association

Appendix A: Scottish Ports Group – Infrastructure Needs

The Scottish Ports Group has collated a list of specific infrastructure needs across the country and it is as follows in alphabetical order:

ABERDEEN

Problem: Main access to port is constrained by busy roads.
Increased vessel sizes associated with existing and new traffic flows requires longer and deeper berths.

Capacity constraints resulting in increased costs and risks for established oil and gas.

Desired Works: Freight priority lanes in roads.
Construction of additional berthing capacity at Nigg Bay.

Steps Taken: The port authority has been in discussion with the Local Authority to discuss these infrastructure needs. Construction has commenced on the Aberdeen Harbour Expansion Project in Nigg Bay and is scheduled for completion in 2020.

CAIRNRYAN / LOCH RYAN

Problem: Poor road access to the ports of Cairnryan and Loch Ryan, particularly on the A75 and A77. The lack of dual carriageway on parts of these roads places limits on the traffic the ports can handle. The ports are in competition with Heysham, Fleetwood, Liverpool and Holyhead for Irish Sea traffic

Desired Works: Dual carriageway extension on the A75 and A77 all the way to the ports and better overtaking capabilities further on, on both roads.

Steps Taken: None so far.

Additional issue: Operation Stack. Cairnryan area. Resilience issue.

An incident occurred during December 2014 when the berth at Stena's terminal was damaged stopping its service and subsequently bad weather closed the P&O terminal. The port of Heysham had already closed earlier, so the combination of high-end year volumes, additional traffic due Heysham being closed meant that local road quickly became clogged causing significant disruption to local residents and there was also no adequate facilities for hauliers trying to cross to Northern Ireland. This resulted in lorries parked in dangerous locations and also made it difficult to pull traffic forward for loading in an orderly manner once port facilities were opened.

Desired Works: An area is required in the event of port closures due to technical or weather problems over a protracted period for freight vehicles to park that is safe and does not congest the local area.

Steps Taken: Discussions are in progress and an advanced stage with the local council and P&O / Stena to utilise an airfield about 5 miles from the port in the event of port closure and the necessity to implement "Stack". Never-the-less the facility is not yet operational.

CROMARTY FIRTH

Problem: Far North Rail Link and rail capacity

Desired Works: Increased frequency of trains between Invergordon and Inverness and improved links north, to help deliver inclusive economic growth and meet low carbon objectives. It will also improve connections for goods, services and people.

Steps Taken: Budgeting consideration but not confirmed if on Transport Scotland's Action Plan.

Problem: Transport links between Inverness and Invergordon and links further north

Desired Works: Improved public transport for workers and cruise passengers to reduce congestion e.g. rail as above and new/increased public bus provision to deliver inclusive economic growth and meet low carbon objectives.

Overtaking lanes on the A9 between Nigg and Tore roundabouts to reduce travel time and congestion (e.g. one each way on the hill to the north of Tore roundabout and one each way between the Cromarty and Nigg roundabouts)

Also better road network north for cruise passengers and for workers travelling from rural communities to work in the Cromarty Firth. This would connect with requirements for the NC500 route and support Scotland's tourism offer.

FORTH PORTS

Port of Grangemouth

Problem: Ongoing lack of investment in main arterial route connections of M8 motorway and further enhancement to M9 motorway junctions.

Consideration to be given to appropriate flood defences for the upper Forth to protect the Port and Grangemouth.

Desired Works: Upgrade of the A801 Avon Gorge to provide an improved HGV connection between the M8 and M9 motorways.

Flood defences to be installed at appropriate parts on the upper Forth and Grangemouth, including the Grange Burn and River Carron.

Steps to take: Both Falkirk and West Lothian Councils have completed all design and technical evaluations of the A801 upgrade, including the necessary land purchases.

Flood defence options for the Grangemouth area are currently being developed by Falkirk Council in conjunction with a number of partners.

Port of Leith

Problem: Congested and inefficient road connections to the Port.

Desired Works: Improved road connections via the East to the Port.

Steps to take: Limited, with some initial masterplanning undertaken in preparation for NRIP.

FRASERBURGH

Problem: Delays on the A952/A90 south of Fraserburgh reduces the efficiency of moving freight to/from the port onto the AWPR. This problem relates to a number of aspects including the transport of fresh fish which is time sensitive for onward transport via the main transport hubs either for processing or export. Transfer of cargo and personnel for oil, gas and renewables industry.

New industrial land zones at the south of Fraserburgh with access issues.

Road safety risk on the A952, the main south bound artery to A90 trunk.

Desired Works: A project to dual the carriageway between Aberdeen and Ellon and to provide a bypass around Aberdeen is underway. The dual carriageway should be extended north of Ellon to Fraserburgh to remove congestion and delays on this stretch and alleviate accident blackspots.

Formation of a fifth spur at roundabout at south entrance to Fraserburgh.

Steps Taken: Nestrans has commissioned a study to look at transport links between Aberdeen and Fraserburgh, investigating rail and road options.

INVERNESS

Problem: Presently access and egress is controlled by traffic lights and this can cause congestion at peak traffic flows. Also need for duelling of the A9. The present arrangements for access to the A9 from the port in a southerly direction are good and the improvements that were undertaken a couple of years ago with a filter lane for southbound traffic assists long loads in gaining access have helped. Arrangements to the north are not so good as traffic is not allowed to access the roundabout to go north but has to go in a southerly direction first for half a mile before exiting the A9 at the Millburn Roundabout and go round it to go back onto the road in a northerly direction, thus having to go round the Longman Roundabout again.

Desired Works: New grade separated junction at the Longman Roundabout. This is the main access and egress from the A9 for port traffic. The proposals are linked into the duelling programme of the main A9. It would be hoped that a grade separated junction would allow traffic to go north directly from the roundabout without doing away with the present wider slip road heading south.

Steps Taken: The port has been in discussion with Highlands Council who appear supportive. The port understands that Transport Scotland may have made a provision for this to be undertaken between 2020 and 2025 but this is a long way off.

LERWICK

Problem: Freight ro/ro linkspan at Lerwick Harbour is from 1977 (38 years old) and narrow and a constraint on the size and configuration of ro-freight vessels that can use it.

Desired works: Replacement of the linkspan with a wider linkspan to suit the next generation of ro-freight vessels, anticipated 2024. Also a modern linkspan requires one operator (compared to two with the current infrastructure) therefore saving operational costs.

Cost: **£2.95 million** (2015 prices and not including optimism bias).

MONTROSE

Problem: Failure to improve road access to the port is restricting development of the potential of the port.

Desired Works: Improved road links to the port to and from the A90 Aberdeen / Dundee and the A92 Montrose / Dundee.

Steps Taken: The port has continuing dialogue with Angus Council, Scottish Enterprise and Scottish Government.

OBAN

Problem: Access to the port involves negotiating the very congested town centre and across a railway bridge.

Resilience issue - in the event of this bridge being considered inadequate for heavy traffic, there is no other access to the port.

No room for port expansion. Having gained access to the terminal, in the summer months at least, it is not unusual for vehicles arriving early for a sailing to be told to go away and come back later, as the place is choked with traffic. There is no HGV parking in Oban, and this often results in trucks orbiting the town's one way system, with obvious consequences.

Desired Works: Improvements to road system in the town and replace bridge. Also replace the railway tracks with more accessible tramline tracks which maintain the train line but would allow roads vehicles to drive over the tracks when the line is not in use. This would create more queueing space at the port terminal relieving pressure in the town centre.”

PERTH

Problem: Failure to improve road access to the harbour is restricting development of the potential of the port.

Desired Works: Improved road links to and from the harbour to and from Edinburgh Road and Junction 10 of the M90 (steep hill and sharp bend). New access road required from harbour to Edinburgh Road / M90. Currently there is no access from the Southbound M90 or access to the Northbound M90 at Junction 10 requiring harbour traffic to go through the congested City Centre.

Steps Taken: Limited steps taken with some high-level route planning for new access road.

PETERHEAD

Problem: Delays on the A90 south of Peterhead reduces the efficiency of moving freight to/from the port. This particularly affects the transport of fresh fish which is time sensitive.

Large items of project cargo have difficulty accessing the Smith Quay / Merchants Quay berths at the port due to road width restrictions at the junction in Peterhead between Kirk St and Charlotte St.

Desired Works: A project to dual the carriageway between Aberdeen and Ellon and to provide a bypass around Aberdeen is underway. The dual carriageway should be extended north of Ellon to Peterhead to remove congestion and delays on this stretch.

The junction at Kirk St / Charlotte St in Peterhead should be realigned to facilitate larger vehicles making the turn.

Steps Taken: Nestrans has commissioned a study to look at transport links between Aberdeen and Peterhead, investigating rail and road options.

SCRABSTER

Problem: Poor road access to the port via the A9, particularly Berriedale Braes. The steep gradient and hairpin bend at the Braes is a very challenging road alignment, especially for HGVs and other long vehicles.

Desired Works: Removal of hairpin bend and improve road alignment. These works would improve journey times and road safety by removing the need for vehicles to slow down or stop to negotiate the bend.

Steps Taken: Following inception and design workshops and public consultation, draft road orders for the Berriedale upgrade were published in December 2014 but there is no current commitment to undertake the works.

STORNOWAY

Problem: Linkspan resilience on main passenger and freight route onto the islands. The freight/reserve link span at No. 1 Pier in Stornoway is more than 40 years old, and can only be used in emergencies. Should there be issues with the 20 year old linkspan at No. 3 Pier, there would be no other linkspan in the Outer Hebrides where the new Loch Seaforth ferry could berth.

Desired Works: Replacement linkspan.

Steps Taken: Issue raised at meetings with Transport Scotland's ferries and ports teams and other representatives.

ULLAPOOL

Problem: Poor access via the A835 causes major traffic problems at the port and in the town. The narrow road which has unchecked parking restrictions and poor issues with road markings has a huge impact on the ferry turnaround times.

Desired Works: Widening of the A835. Relatively straightforward and not a huge cost, circ £80K.

Steps Taken: Transport Scotland produced a draft report after a site visit and discussion with Scottish Water (who have infrastructure under the road). Report is now finalised with costing in place, Transport Scotland are pushing forward the proposal with BEAR and are planning a public consultation later in 2017.

All North West Coast Ports

OBAN, MALLAIG, FORT WILLIAM, TOBERMORY, CRAIGNURE, UIG, PORTREE and on to INVERNESS and others

Problem: All North West Ports depend on the A82 with the A82 branching to Oban, to Mallaig A830 and the A87 to Portree and Uig.

In many parts; the structure, the width, the alignment of this the only west coast artery / major trunk road are still in the 19th century.

Desired Works: Improve all sections of the A82 below modern twin track trunk road standards before 2020

Passenger and Freight numbers and volume from these ports are collectively funding for the A82