

Euan Donald  
Clerk to the Local Government, Housing and Planning Committee  
Scottish Parliament

09 March 2022

**By email only to [netzero.committee@parliament.scot](mailto:netzero.committee@parliament.scot)**

Dear Euan,

#### **DRAFT NATIONAL PLANNING FRAMEWORK 4**

We would be grateful if you could share this letter with members of the Local Government, Housing and Planning Committee to inform their scrutiny of the draft National Planning Framework 4 (NPF4).

By way of introduction, AGS Airports operates Aberdeen and Glasgow airports, who between them:

- support over 30,000 thousand jobs;
- generate in excess of £2 billion in GVA annually;
- serve 13 million passengers; and
- handle over a quarter of Scottish exports by value.

Scotland is a relatively peripheral country. Air travel is the only mode providing international passenger connectivity to/from Scotland and the only feasible and convenient mode for many UK and intra-Scotland routes. Connectivity may be an abstract concept, but the jobs, family links, trade routes and social and cultural experiences that it enables are very real.

Scotland's connectivity has historically lagged that of similar countries, creating challenges for people and the economy around cost, accessibility, profile and productivity. These challenges and the priority need to address them have been recognised by consecutive National Planning Frameworks, most recently in the NPF4 Position Statement. Scottish Government trade, tourism, transport and even climate change policies all recognise the need to enhance connectivity.

Despite this, and without any rationale or justification, the draft NPF4 fails to make any reference whatsoever to airports as the country's principal gateways within the national spatial strategy. The strategic airport enhancements national development designation – so important for investor confidence and the ability of airports to develop and decarbonise – has been revoked, again without any rationale or justification.

NPF4 comes at a pivotal time for Scotland, set against a formidable backdrop of Covid-19, Brexit and net zero carbon emissions targets. Our airports can deliver vital connectivity and are committed to achieving net zero by 2045. However, these commitments will only be delivered if NPF4 provides the required vision and support.

It is imperative that the final NPF4 restores strategic connectivity as a national spatial priority and a designated national development. We have attached our representations to previous NPF4 consultations for your information. We would welcome the opportunity to discuss this matter in greater detail with the committee or with individual members.

Yours sincerely

Ross Nimmo MRTPI  
**Head of Planning and Development**