

<b>Issue 2.7</b>	<b>Key Areas of Change – Fife</b>	
<b>Development Plan reference:</b>	<b>The Spatial Strategy, Key Areas of Change Fife, pages 24 – 25, para 3.24 – 3.28</b>	<b>Reporter: [Note: For DPEA use only.]</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr Keith Bedborough (856480) Forth Ports Ltd (929573) I and H Brown (039375) Musselburgh Conservation Society (927996) Mrs Susan Hunter (039853) Mr Bill Livingston (030023) Mrs Mirabelle Maslin (928549) Mrs Debra Nixon (031941)	RSPB Scotland (031480) Scottish Government (034404) Scottish Wildlife Trust (038549) ScottishPower Generation (034698) Shepherd Offshore (Scotland) Ltd (038954) Cllr Mike Shirkie (038796) South Dunfermline Community Council (039583)	
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy - Key Areas of Change and Fife.	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr Keith Bedborough (856480)</u>  Support for Key Areas of Change Fife but seeks clarification on paragraph 3.26, with more clarity on the south eastern boundary of Dunfermline and clarification on whether the Eastern Expansion of Dunfermline is now complete.</p> <p><u>Forth Ports Ltd (929573)</u>  The Port of Methil and the Port of Kirkcaldy should be identified in the Proposed Plan as Forth Coast Cluster locations. Seeks re-wording of paragraph 3.25 to differentiate proposals at Rosyth from provision of additional freight handling capacity on the Forth, i.e. elsewhere at existing ports.</p> <p><u>I and H Brown (039375)</u>  Seeks to identify land to south west of Kelty as an area identified for strategic growth, including residential and employment land.</p> <p><u>Musselburgh Conservation Society (927996)</u>  The Proposed Plan should make provision for regenerating Fife's mining towns and should also include scope for one or more new settlements in Fife.</p> <p><u>Mrs Susan Hunter (039853)</u>  Seeks clarification on boundaries of development to the east of Dunfermline, in particular the eastern expansion.</p> <p><u>Mr Bill Livingston (030023)</u>  Proposed Halbeath / Kingseat housing development requires to be carefully</p>		

phased in line with road infrastructure to avoid congestion.

Mrs Mirabelle Maslin (928549)

Paragraph 3.28 should be revised to make this more precise and to ensure this aim does not become side-lined.

Mrs Debra Nixon (031941)

Supports the aim of a Green Network Priority Area close to Dunfermline, and the opportunities / aims 'to strengthen the landscape setting of the settlement to the north and west and provide a more joined up walking and cycling network providing access to Townhill Country Park.' Questions route of any northern relief road including potential loss of green space and biodiversity/wildlife impact.

RSPB Scotland (031480)

Should make more reference to nature, habitat and protected areas. Representation also seeks for St Margaret's Marsh SSSI to be given due consideration as part of any development at Rosyth Waterfront.

Scottish Government (034404)

Proposed Plan should be modified to have greater consistency with reference to Scottish Government supported task forces, and in the case of Fife, the Fife Economy Partnership.

Scottish Wildlife Trust (038549)

Insufficient detail on biodiversity in relation to proposed Green Network Priority Areas (paragraph 3.28).

ScottishPower Generation (034698)

Key Areas of Change Fife does not take account of NPF3 policy relating to the former Longannet Power Station.

Shepherd Offshore (Scotland) Ltd (038954)

Support for the Proposed Plan identifying the Forth Bridges as a gateway to employment and business. Support is also noted for the plan's focus on Fife, in particular strategic growth in Dunfermline, and representation also promotes site at Halbeath. Plan should go further to offer support to allocated sites which have infrastructure constraints. Recommends that the findings of the review of the planning system be considered during preparation of the Proposed Plan.

Cllr Mike Shirkie (038796)

Seeks amendments to wording of paragraphs 3.24 and 3.25 of the Spatial Strategy in relation to the Forth Bridgehead area and Rosyth Waterfront.

South Dunfermline Community Council (039583)

General support for Key Areas of Change Fife but seeks clarification on paragraph 3.26 and whether the Eastern Expansion of Dunfermline is now complete.

**Modifications sought by those submitting representations:**

Mr Keith Bedborough (856480), South Dunfermline Community Council (039583)

Modify paragraph 3.26 to include more clarity on the south eastern boundary of Dunfermline and clarification on whether the Eastern Expansion of Dunfermline is now complete.

Forth Ports Ltd (929573)

Modify paragraph 3.25 to read as follows: 'However, if the plan's vision is to be delivered in full, it is important that Fife's social and economic needs continue to be met locally, where possible, in order that the area's towns can continue to thrive and the need to travel to employment is reduced. Rosyth Waterfront, the Port of Burntisland, the Port of Kirkcaldy, the Port of Methil and Energy Park Methil [part of the 'Forth Coast Cluster'] provide a range of business opportunities, including renewable manufacture and servicing, as well as other port related operations. Potential exists for the development of some additional Freight Handling Capacity on the Forth [a National Development] needed in relation to the heavily used North Sea freight shipping routes at Rosyth Waterfront. Further environmental assessment work is currently being carried out to support the marine consents needed to progress work related to proposals at Babcock Rosyth.'

Modify Figure 3.4 to identify the Port of Kirkcaldy and the Port of Methil as Forth Coast Cluster locations.

I and H Brown (039375)

Add direct reference to land at Kelty South West as a strategic growth area to paragraph 3.27.

Add land to South West of Kelty as an area of strategic growth to Figure 3.4.

Mrs Susan Hunter (039853)

No modification specified, however, representation requests clarification from the Proposed Plan on boundaries of development to the east of Dunfermline, in particular the eastern expansion.

Mr Bill Livingston (030023)

Proposed Halbeath / Kingseat housing development requires to be carefully phased in line with road infrastructure to avoid congestion.

Mrs Mirabelle Maslin (928549)

Paragraph 3.28 should be revised to make this more precise and to ensure this aim does not become side-lined.

Musselburgh Conservation Society (927996)

No modification specified, however, Key Areas of Change Fife section of the plan should be modified to make provision for regenerating Fife's mining towns and should also include scope for one or more new settlements in Fife.

Mrs Debra Nixon (031941)

No modification is specified, however the representation seeks that any new northern relief road for Dunfermline avoids Townhill village and specifically Townhill Park.

RSPB Scotland (031480)

Modify Key Areas of Change Fife (paragraphs 3.24 – 3.28) to highlight the need to consider biodiversity impacts on the key areas of change.

Scottish Government (034404)

Modify paragraph 3.27 to add new second sentence as follows: 'There is also a need to support economic growth and employment creation, with particular focus on delivery of an agreed economic recovery plan for the Glenrothes and Central Fife sub-region. This is being taken forward by the Fife Economy Partnership.'

Scottish Wildlife Trust (038549)

Paragraph 3.28 should be modified to add greater detail on the biodiversity elements of proposed Green Network Priority Areas.

ScottishPower Generation (034698)

Add the former Kincardine Power Station as a Forth Coast Cluster (Figure 3.4).

Add new first line of paragraph 3.27 to read as follows: 'Whilst electricity generation at Longannet Power Station recently ceased, the site retains a national development designation within NPF3, encouraging continued baseload generation. Proposals for such development should be supported, as should any development consistent with policy emerging from any NPF review during the lifetime of SESplan.'

Shepherd Offshore Scotland Ltd (038954)

No modifications specified, representation indicates further support should be given by the Proposed Plan for sites where there are infrastructure constraints.

Cllr Mike Shirkie (038796)

Delete paragraph 3.24 and insert following: 'The Forth Bridge, the Forth Road Bridge and the soon to be completed Queen's Crossing provide a unique gateway to Fife and are key to employment and business. This coupled with the City Region Deal and other initiatives will ensure that Fife continues to prosper. The award of World Heritage status to the Forth Bridge adds a further dimension to this unique site of three bridges spanning the Forth, built in three different centuries.' □

Modify existing paragraph 3.25 and insert 'mixed use including tourism' to line 10, to read as follows: 'However, if this plan's vision is to be delivered in full, it is important that Fife's social and economic needs continue to be met locally, where possible, in order that the area's towns can continue to thrive and the need to travel to employment is reduced. Rosyth Waterfront, Burntisland Port and Energy Park Methil (part of the 'Forth Coast Cluster') provide a range of business opportunities, including renewables manufacturing and servicing and mixed use including tourism'.

Delete existing third line of paragraph 3.25 and replace with the following: 'Such is the size and scope of the Rosyth Waterfront site it can readily accommodate both mixed use and port related industrial development. Projects are in hand to develop additional Freight handling capacity. Mixed use development will allow the development of tourism, a recognised growth area in our economy, thus taking

maximum advantage of this unique site’.

### Summary of responses (including reasons) by Planning Authority:

#### **Economy / Employment**

Scottish Government (034404)

The Fife Economy Partnership plays a role in conjunction with the Scottish Government, private sector businesses and Fife Council in setting economic development priorities and identifying priority areas for investment within Fife. If the Reporter is so minded, in the interests of clarity and to reflect the existing position in central Fife, Proposed Plan text could be made clearer in paragraph 3.27 by addition of a new second line to read as follows: ‘There is also a need to support economic growth and employment creation, with particular focus on delivery of an agreed economic recovery plan for the Glenrothes and Central Fife sub-region. This is being taken forward by the Fife Economy Partnership’. **No modification proposed.**

#### **Environment, Biodiversity and Green Networks**

Mrs Mirabelle Maslin (928549), Scottish Wildlife Trust (038549)

Disagree with proposed modification. The Enhanced Green Networks section of the plan (paragraphs 5.20 – 5.21) outlines clear guidance to member authorities on this issue. Paragraph 5.20 directs that ‘SESplan member authorities will prepare non-statutory Frameworks for the other Green Network Priority Areas and incorporate the key elements of these frameworks into the relevant Local Development Plan at the first opportunity’. Paragraph 5.21 states that ‘These frameworks will: Identify and safeguard those elements of the green network that provide, or have the potential to provide, the greatest benefits for people and nature; Identify strategic enhancements to green networks that will add value to existing settlements, developments for which land has already been allocated, and any new allocations in subsequent Local Development Plans; Provide an additional context for planning decisions’. SESplan consider this provides sufficiently clear detail to suitably direct LDP’s and to expand on paragraph 3.28. **No modification proposed.**

RSPB Scotland (031480)

Disagree with proposed modification. Development guidelines in relation to SSSI can be found in other legislation, including SPP, which there is no requirement to repeat in the Proposed Plan. The Placemaking Principles of the plan makes a clear direction that the contribution of the natural and historic environment to making distinctive places should be maximised. Environmental impacts of specific development proposals will be assessed by the LDP process through planning applications and/or site masterplans where appropriate. In addition, FIFEplan is supported by a Habitat Regulations Assessment which screens and assesses policies, proposals and sites where required (ASD78). **No modification proposed.**

#### **Energy, Infrastructure and Transport**

Mr Bill Livingston (030023)

No modification is specified, but representation states that proposed Halbeath / Kingseat housing development requires to be carefully phased in line with road infrastructure to avoid congestion. This is not a comment on a strategic

development plan matter, and is more related to the LDP and site masterplan. The Masterplan is required to have reference to a list of detailed requirements which address phasing and strategic and local road improvements. In addition, in the Examination Report of FIFEplan (ASD05), a further statement was recommended for inclusion to the plan as follows: "To address concerns about the effect of development on the transport network, including Halbeath Road corridor, Kingseat Road (railway level crossing), Whitefield Road, Townhill Road and East Baldrige Drive, transport assessments for each individual development must be carried out. The assessments will not be confined to the locations just mentioned but will consider the effects on the whole of the transport network. The assessments must include the effects of traffic on air quality. The assessments must identify mitigation measures needed to maintain the efficiency of the transport network and to avoid unacceptable effects on air quality." SESplan consider the above provides a clear response to this issue. **No modification proposed.**

Mrs Debra Nixon (031941)

No modification is specified, however the representation seeks that any new northern relief road for Dunfermline avoids Townhill village and specifically Townhill Park. FIFEplan identifies an indicative route (ASD79); a detailed alignment will be defined though the planning applications for the associated developments. FIFEplan will identify Green Network Priorities for this proposal. **No modification proposed.**

Shepherd Offshore (Scotland) Ltd (038954)

Development is required to deliver necessary infrastructure alongside development. Individual authorities assess local development infrastructure requirements, including health, education and transport. Where it is identified that new development will have an impact on infrastructure it is the responsibility of the developer to ensure that this impact is mitigated. It is not the responsibility of individual local authorities to fund the mitigation of new development, or fund in advance of development. **No modification proposed.**

**Plan Designations**

Mr Keith Bedborough (856480), Mrs Susan Hunter (039853), South Dunfermline Community Council (039583)

The planned Dunfermline Eastern Expansion is not complete. FIFEplan sets out the settlement boundaries and the settlement plan for Dunfermline (ASD79). **No modification proposed.**

Forth Ports Ltd (929573)

Disagree with proposed modifications. Disagree with requirement to have separate Forth Coast Cluster designations separating Port of Methil with Energy Park Methil. Energy Park Methil Significant Business Cluster is intended to include the Port of Methil. Disagree with insertion of 'as well as other port related opportunities' - the text clearly allows for a range of flexible uses with a focus on economic activity and growth, including a clear direction to member authorities that 'Local Development Plans will adopt a flexible approach to allow for new long term employment opportunities' (paragraph 4.5). This is also further expanded on by text in Table 4.1 Significant Business Clusters which outlines the range of opportunities considered appropriate in Forth Coast Cluster locations. **No modification proposed.**

I and H Brown (039375)

Disagree with proposed modification. Although land at Kelty South West is not identified in Figure 3.4 as a Strategic Growth Area, this does not prohibit consented development from taking place there – Kelty South West is an allocated site in Proposed FIFEplan (site reference KEL 005) and a planning application is before the Council for the development of this allocated site (ASD79). Important to note that the Strategic Development Plan highlights areas of Strategic Growth and Rural Growth Areas within Fife, but does not prohibit development in other areas from being put forward for consideration through the LDP programme. **No modification proposed.**

Musselburgh Conservation Society (927996)

Disagree with proposed modifications. Important to note that the Strategic Development Plan highlights areas of Strategic Growth and Rural Growth Areas within Fife, but does not prohibit development in other areas. In relation to a new settlement for Fife, as set out in paragraph 5.8 of the Proposed Plan, current housing land estimates (Table 11.2 in Housing Background Paper) indicate that there is sufficient housing land supply to meeting the Fife Housing Land Requirement (ASD22). Therefore it is currently estimated that the next Fife LDP will not be allocating additional housing land. In relation to regenerating Fife's mining towns, SESplan notes the response and acknowledges the need to support economic growth and employment creation. Location specific programmes within Fife are being taken forward by the Fife Economy Partnership. **No modification proposed.**

ScottishPower Generation (034698)

Disagree with proposed modification. Longannet Power Station is identified as a Forth Coast Cluster and the Proposed Plan clearly supports a range of uses in this location (see Table 4.1 Significant Business Clusters). The text specifically highlights that 'Subject to a review of the National Planning Framework, locations at the former Longannet and Cockenzie power station sites may have potential for a wider range of uses.' The site of the Former Kincardine Power Station has not been identified as a Forth Coast Cluster, but this does not prevent development from taking place in this location. **No modification proposed.**

**Fife Spatial Strategy**

Cllr Mike Shirkie (038796)

Disagree with proposed modification. It is too early to predict the impact of a City Region Deal. The Forth Rail Bridge and its World Heritage Site status has been referenced under the SESplan Assets section of the Proposed Plan. The Forth Bridges have been acknowledged by the plan as a key gateway to employment and business.

Disagree with proposed modification. SESplan considers the Proposed Plan text clearly allows for a range of flexible uses with a focus on economic activity and growth, and that this could include tourism where appropriate. This is also expanded by Table 4.1 Significant Business Clusters which outlines the range of uses and opportunities at Forth Coast Cluster locations, including Rosyth Waterfront. It is noted that the reporter considering this matter in the recent

FIFEplan examination (ASD05 published November 2016) found no reason to make changes to the Proposed Local Development Plan. Reference was made to Policy 2 of the approved SESplan which says that development of mixed communities on strategic employment sites may be appropriate but noted that this does not endorse such development in all instances. For reasons given below, the reporter found that a mixed-use development of the kind put forward in the representation would not be appropriate on the representation site.

Disagree with proposed modification of third line of paragraph 3.25. SESplan do not support the addition of mixed use to text relating to Rosyth Waterfront. Text in the Proposed Plan, including Table 4.1 Significant Business Clusters, clearly allows for a range of flexible uses with a focus on economic growth. **No modification proposed.**

15 representations of support for this section of the Proposed Plan are noted.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]