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Fife Council Response to National Planning Framework (NPF) 4 Call for Ideas

Comments, on how Scotland should look by 2050, are sought by 31st March 2020. The Scottish Government National Planning Framework 4 Call for Ideas consultation focuses on 5 key issues as set out below: -

1. What development will we need to address climate change?
2. How can planning best support our quality of life, health and wellbeing in the future?
3. What does planning need to do to enable development and investment in our economy to benefit everyone?
4. How can planning improve, protect and strengthen the special character of our places?
5. What infrastructure do we need to plan and build to realise our long-term aspirations?

1.0 Overview

1.1 This response provides initial ideas on nationally important landuse priorities for Fife. Key document references are included in Annex 1.

1.2 NPF3 sets out a number of key national priorities for landuse across Fife and the Council consider that NPF4 needs to build upon this. The Local Outcome Improvement Plan, the Plan4Fife (2017) clearly sets out the outcomes which the Council is working towards and places a central focus on Mid Fife - citing the need to address a lack of jobs, poor health outcomes and high deprivation indicators in addition to poor accessibility connections. The key projects relevant to, and submissions made by, Fife within the published NPF3 are listed in Annex 2.

1.3 The Fife Council area is the third largest local authority area within Scotland by population and is a locale which is situated within and serves Central Scotland – linking the North Sea and Forth or Tay Estuary's with the remainder of the Scotland and beyond. Critically, the authority area also contains several nationally significant sites such as UK Ministry of Defence Estate Assets at Leuchars, deep water internationally significant ports at Burntisland and Rosyth in addition to the site of Scotland's last coal fired power station, Longannet (which closed early in 2017).

1.4 It is considered that within Fife, NPF4 will require to not only acknowledge the existing nationally significant sites but consider the further opportunities as set out in this initial response. Fife Council will develop these opportunities further in written and graphic forms for submission to Scottish Government by end June 2020 to inform NPF4 further.

2.0 The Five Questions in the Call for Ideas

Question 1 - What development will we need to address climate change?

2.1 Fife Council declared a climate emergency in 2019. It is recognised that Fife Council and the wider community have made considerable progress at reducing emissions and increasing resilience, but that we now need to mobilise to accelerate

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the pace and ambition of our response to the climate crisis. Climate Fife is Fife's most recent response to the climate emergency.

2.2 Planning authorities will have to rethink how and where we build; how we use land; how we move around and how we heat and power our homes and businesses. All of this will need to be considered against the backdrop of public investment programmes and the viability of the private sector to fund change.

2.3 Fife has a strong and growing profile of low carbon sector businesses, a range of site development locations, world-class training and research facilities, and a local authority committed to supporting innovation in carbon reduction. Examples of this include recent investment in Glenrothes District Heat Scheme/s, Lochhead Landfill which includes renewable energy and a heat network and the progression and the establishment at Energy Park Fife, including a wind turbine demonstrator.

2.4 By 2045 Fife Council consider Scotland should be: climate friendly, having transformed the economy, infrastructure, land use and energy system to decarbonise how we live; climate ready, with plans and projects to increase the resilience of communities and the economy to help minimise the impacts from unavoidable climate change; and climate just, ensuring that all communities and the wider environment can benefit from this transition.

2.5 Fife Council is being ambitious in this regard publishing a Climate Fife Action Plan in 2019 which (with associated policies and projects) it is expected will inform and drive future spatial planning strategies. Key areas of focus sought are: Energy Efficiency; Low Carbon Energy; Movement, Storage and Transformation of Energy; Sustainable Transport; Carbon Sequestration; Adaptation; and Innovation and Co-ordination.

2.6 This will require a spatial and land use focus including revised Development Plan strategies, development of design and building policies aligned to energy technology incorporation, continued promotion of sustainable urban drainage networks and green corridors aligned with energy storage or sequestration infrastructure and the promotion or safeguarding of land for community led energy technology schemes. In addition, there is an increase required in renewable energy capacity and output. Fife is well positioned for this with the latent heat resource opportunities of the North Sea and Forth and Tay estuaries and the geothermal opportunities of the central Fife coalfield. This contribution can also be enhanced by the co-location of compatible technologies such as storage and solar.

2.7 In addition, the alignment of Regional Spatial Strategies with other regional activities for example City Region Deals, Regional Economic Partnerships and Regional Transport Partnerships will become critical if the environmental low carbon objectives are to be integrated and achieved. Up to date information and data is also important, such as Scotland's flood maps and priority should be given by the Scottish Government and its agencies to ensure these are kept updated.

2.8 Fife is well placed to build on its strategic business clusters and its circular economy. Clean growth corridors identified nationally could be part of this approach. Green corridors aligned with energy storage or sequestration infrastructure and the promotion or safeguarding of land for community led energy technology schemes, could also be complimented by zero carbon research and innovation projects led by

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an alliance of academia and industry. Within Fife, opportunities arise in the Longannet -Burntisland – Levenmouth corridor (including Forth Ports, Babcock & the Fife Energy Park) and between Dundee and St. Andrews (including St. Andrews University's renewable energy project at Eden Campus, Guardbridge) where assets such as strategic sites and physical and digital infrastructure already exists.

2.9 National policies and funding should have more focus to support regeneration to assist communities and make use of any capacity within existing infrastructure but also, to reduce greenfield land consumption. The importance of Prime Agricultural land should be further protected through national policy.

2.10 Consideration requires to be given as part of Scottish Government Planning Reform to how building regulations and planning policies align to ensure that shared building adaptability targets or similar standards are met. Much of this change should be through building regulations to best ensure that these changes are introduced timeously and are not optional.

Question 2 - How can planning best support our quality of life, health and wellbeing in the future?

2.11 Spatial planning has the potential to lessen the impact of global climate change and help achieve sustainable development. Planning, along with Transportation and aligned, relevant Community Planning strategies, can facilitate increased usage and access to public transport, walking and cycling modes, for example by encouraging higher density development around transport nodes and an increase in mixed land-uses thus helping create balanced communities. National planning policies should be enhanced to help ensure that development proposals deliver good quality places.

2.12 *Homes for all*, a key objective of the Edinburgh & East Scotland Regional Housing Partnership, should also be a central objective for NPF4. The government should set housing targets. Spatial planning through, Local Development Plans, must carefully consider the location, density and type of homes which will be required by 2050. Homes need to be affordable to all, in locations which encourage use of public transport and are protected from environmental changes (such as flooding). As a result of climate change, it may be appropriate to stop further growth in certain areas. The allocation of land to smaller towns and villages, where appropriate, could provide housing choice for local communities, and help sustain local services. The type of houses delivered by housing providers will also become more important as demographic changes continue. Not only do homes need to be delivered in the right locations alongside sustainable modes of travel but they need to be built to accessible standards and of the right size to meet the needs identified in the relevant Housing Needs Demand Assessment.

Question 3 - What does planning need to do to enable development and investment in our economy to benefit everyone?

2.13 Strategic employment sites are identified at Longannet, Rosyth, (these sites are also identified in NPF3 as existing National Developments) Inverkeithing, and in Mid Fife at Burntisland and Methil (Energy Park Fife). The delivery of these sites continues to be a central focus. The Fife Economic Strategy, the emerging Mid Fife

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Action Plan and respective City Deal programmes complement this by aligning economic growth activities, inward investment sector support and funding to ensure that the objectives of Inclusive Growth, Investment, Internationalisation and Innovation are achieved. Through this and other funding streams strategic employment focus is being placed on the realisation of future business infrastructure at Mitchelston Kirkcaldy, Queensway Glenrothes, Hillend and Donibristle, Dalgety Bay, Eden Campus Guardbridge and in Levenmouth.

2.14 Focus also continues to be placed on supporting town centre regeneration especially in Kirkcaldy, Dunfermline, Leven and Cupar. The decline in retail outlets and the changing role of town centres presents an opportunity for different town centre uses, for example housing, workspace and leisure, around a strong public realm.

2.15 Whilst it is recognised that growth brings many benefits, the increased revenue implications to the public sector is becoming challenging and the Scottish Government is urged to recognise and consider this in NPF4. This is particularly challenging in areas like Dunfermline where, growth on a very large scale requires significant new infrastructure, which will require future maintenance. The revenue costs of new schools required in these areas are of a scale that will impact significantly on the financial sustainability of the Council.

2.16 Fife comprises of a number of small and medium sized towns. These settlements have relied upon jobs in traditional manufacturing industries (which are in decline or transitioning to differing forms of sector activity or operational processes) and the public sector (which is experiencing significant funding pressures) and are experiencing the resulting economic impact. Brexit may also compound problems over the next few years, depending on what trade deals are agreed. These may be particularly relevant to land use patterns in North Fife where the rural economy including food production and the international role of Ports such as Dundee, Burntisland and Rosyth may be directly affected. Junction 4 Gateway should continue to be a focus for distribution and access to national leisure activities serving Central Scotland. Junction 3 also provides a Gateway around a strategic employment site, Fife College and park and choose facilities.

2.17 The importance of agriculture and food industries in Fife should be recognised. The identification of potential agri-business corridors should be considered.

Question 4 - How can planning improve, protect and strengthen the special character of our places?

2.18 Digital lifestyles, and the internet, has also changed how communities, businesses and individuals work. Enhancing places to make it easier to walk and cycle to school, local shops and other facilities and improving public realm particularly within town centres. As town centre uses continue to change, accessibility and inclusiveness should be central to their future role. The decline in retail outlets allows for more flexible housing, workspace and leisure activities in town centres.

2.19 Fife's historic, built and natural environments continue to need protection and enhancement – with good place making within communities at the heart with the protection of areas, and buildings, of special character. Within Fife, a Built Heritage

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Strategy is to be progressed during 2020 but meanwhile recognition should be given nationally to the role of Fife in serving the World Heritage Site at the Forth Bridges and in providing national planning support to the promotion and realisation of Mid Fife as a tourism destination, recognising the recently opened long distance footpath which traverses the region linking the Forth and the Tay – The Fife Pilgrims Way.

2.20 Continuing to identify the Central Scotland Green Network as a national development will increase the opportunity to further develop connected, multi-functional greenspaces across the area to add to the already significant resource that is available. This can also include new active travel routes such as paths and cycleways including in Fife the Pilgrims Way and the coastal path network.

2.21 Afforestation projects, especially those involving urban greening and on higher ground upstream, offer a wide range of benefits over and above carbon sequestration: cleaning air, reducing flood risk, and reducing the impact of climate change.

2.22 The protection and enhancement of existing green and blue infrastructure cross Fife towns, as well as the introduction of new spaces, is important to the health and wellbeing of communities, as well as reducing flood risk, and reducing the impact of climate change. Fife has strategic potential in this regard recognising the regional role economically and recreationally of the Forth and Tay but also in promoting further with Scottish Government the regeneration value that is being borne in Mid Fife at Levenmouth assisted by SEPA who are progressing a river corridor project along the River Leven.

Question 5 - What infrastructure do we need to plan and build to realise our long-term aspirations?

2.23 A high frequency, affordable, sustainable transport system should sit at the heart of any National Planning Framework. Multiple benefits include health & wellbeing via active travel; greater connectivity; and reduced carbon footprint. Energy infrastructure to ensure that our places are more sustainable, and green infrastructure particularly in key locations to mitigate climate change impacts.

2.24 Fife's location between two city regions can currently exacerbate regional inequality between cities and hinterlands – better interconnectivity could improve this allowing wider opportunities for more of the population to contribute to the economy, as well as affording the opportunity to access cultural and historical assets. The presence of major transport networks across the region (M90, A92, East Coast Mainline Railway, Queensferry/Kincardine/Tay and Forth road and rail bridge crossings) is not fully recognised with limited national investment in the connecting transport infrastructure within Fife, much of which could contribute positively in improving accessibility within Fife and in turn improve investment opportunities and population retention. This is particularly important within Mid Fife which requires transport improvements to stimulate growth and achieve regeneration. In terms of rail, the electrification of the east coast mainline and/or Fife Circle through Fife would be a significant boost allied with enhanced rail station capacities and facilities, complemented by committed rail investment already announced during 2019/2020.

2.25 The delivery of the Strategic Development Areas (SDAs) are central to the spatial strategy. SESplan, TAYplan and FIFEplan propose a number of SDA sites for development. Development of the SDAs will help achieve the outcomes of the Plan 4

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Fife, Fife's Local Outcome Improvement Plan, and, in particular, contribute to the themes of thriving places and inclusive growth and jobs.

2.26 Strategic Development Areas in Dunfermline, Kirkcaldy, Kelty and St Andrews are progressing. Dunfermline is also one of the seven strategic sites identified in SESplan as a key area of change and growth and is reflected within the Edinburgh & South East Scotland City Deal. Delivery of the remaining strategic development areas, in Cupar, Levenmouth and across the Ore Valley continues to be a central focus. The SDA sites will deliver a large number of affordable homes, and in some cases employment land, as well as delivering a significant scale of new community infrastructure. The delivery of strategic transportation interventions and community facilities (including secondary and primary school provision) to support this growth and the associated revenue costs will continue to be a challenge.

2.27 The onus must shift regarding infrastructure provision for growth from requiring developer or local authority led assessments and provision to preparing a costed, funded and nationally ambitious strategy(s) which recognise that Scotland can and will have connected and cost-effective sustainable infrastructure

2.28 A series of internal Regional Spatial Strategy workshops were held during February and March 2020 from which infrastructure priorities have emerged. These areas of focus, however, require National recognition and resourcing.

3.0 Conclusion

3.1 By 2045 Fife Council consider Scotland should be: climate friendly, having transformed the economy, infrastructure, land use and energy system to decarbonise how we live; climate ready, with plans and projects to increase the resilience of communities and the economy to help minimise the impacts from unavoidable climate change; and climate just, ensuring that all communities and the wider environment can benefit from this transition.

3.2 In conclusion, it is recommended that the forthcoming National Planning Framework should consider addressing the following key issues: -

- Connectivity - high frequency, affordable, sustainable transport system should sit at the heart of any National Planning Framework;
- Infrastructure – especially transportation and greener energy will require public investment programmes to fund change; and
- Economy – supporting greener economies and inclusive growth.

3.3 In the context of the above, it is recommended that National Planning Framework 4 should consider including the following projects for Fife: -

- The strategic transport infrastructure investment required in Fife to support the Council's Strategic Development Area programme as set out within FIFEplan LDP 2017 and, in the case of Dunfermline, reflected within the Edinburgh and South East of Scotland City Deal;
- Promote shared infrastructure in Fife including road networks serving Forth, Kincardine and Tay Bridgeheads. The National Transport Strategy, Strategic

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Transport Projects Review and NPF4 should seek to promote river borne transport or help to repurpose strategic river networks such as the Forth and Tay for economic activity including aquaculture, tourism and local access or biodiversity purposes whilst ensuring that existing road or rail networks serving these locations support this;

- The importance of utility companies identifying new capacity and network reinforcement to support growth and ensure continued water and electricity supply across Fife and beyond;
- Recognise that district heat networks within development growth areas should be considered through legislation to ensure implementation to deliver the stepped change needed in the design of new sustainable places. It may be that opportunity also exists nationally for strategic energy opportunities to also be identified, again using river corridors where opportunities including carbon storage or heat production (geothermal) can be realised. This is exemplified currently on Fife's western boundary where adjacent authorities progressing the Stirling and Clackmannanshire City Deal are scoping a regional energy masterplan – this could be considered nationally for/in the Forth and in turn benefit Fife and beyond;
- The delivery of the Fife Industrial Estate Regeneration programme agreed and funded through the Edinburgh and South East Scotland City Deal needs recognition spatially as do future opportunities for advanced manufacturing sites harnessing potentially existing skills and a strong business base within Glenrothes and Rosyth. There is a significant industry 4.0 growth potential in and around Glenrothes, whilst Rosyth (Babcock) has land and scope for engineering expansion;
- Secure resources focused on specific place or project-based interventions. This will include prioritisation and progression of:
 - The emerging Mid Fife Economic Action Plan – an analysis of, and response to, the weak economic profile of Mid Fife, proposing future areas of job creation and supporting infrastructure;
 - The multi-agency 'Leven Project' and associated connectivity project/s can align with the Levenmouth (Rail) Investment and associated Blueprint. Scottish Government approved the reopening of the Leven Rail Line (estimated cost £70 million). In association, a £10m Levenmouth Blueprint is proposed (jointly funded by Transport Scotland and Fife Council) with a view to promoting economic growth and regeneration in the area as part of the transport investment;
 - Eden Campus - being developed as a national centre of excellence for research and development of low carbon technologies (within the proposed Tay Cities Deal). This could form part of a new Clean Growth Corridor;
 - Strategic Investment Locations – critical roles of Rosyth Port/s, (Rosyth Port Rail Link not committed but discussions on going), Burntisland

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Port, Queensway Glenrothes, Fife Energy Park Levenmouth, Mitchelston Kirkcaldy, and Westfield;

- Improved public transport connectivity with Edinburgh City Centre;
- A985/M90 traffic flow improvements serving Rosyth Port and West Fife including provision of park and choose, passenger ferry or river taxi options. (National support required to provide park and choose and rail facilities in Fife to compliment reduced car use in Edinburgh);
- Taybridge Park and Choose - following the successful Park and Ride facilities at Ferrytoll and Halbeath, it is proposed that a park and choose facility should be provided in the Tay Bridgehead area to assist connectivity and sustainable travel into Dundee and wider Tayside;
- Maritime gateway facilities (passenger and freight) serving Rosyth Port, in addition to scoping opportunities for additional container capacity/freight handling facilities and supporting dual fuel shipping;
- Electrification of the East Coast Main Line and Fife Circular;
- Progression of the Dunfermline to Alloa railway route, and electrification, including delivery of the Charlestown Rail Chord to enable direct westerly access to Rosyth Port; and
- Potential for a rail freight hub in Mid Fife to achieve more of a modal shift from road to rail.

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Annex 1 - Adopted or Approved Fife Council documents

1. National Planning Framework 3, 2014
2. Fife Development Plan
 - SESplan¹Strategic Development Plan and TAYplan Strategic Development Plan 2017
 - FIFEplan Local Development Plan, 2017
3. Fife Economic Strategy, 2017
4. Plan 4 Fife Local Outcome Improvement Plan, 2017
5. Edinburgh and South East Scotland City Deal, August 2018
6. Tay Cities City Deal, April 2019
7. 'Climate Fife' Sustainable Energy and Climate Action Plan, 2019
8. Regional Transport Strategies (SEStran 2015 and Tactran 2015) and Local Transport Plan/s
9. Mid Fife Economic Action Plan (Emerging)
10. Tay Cities Economic Strategy, September 2019
11. Infrastructure Commission Report, January 2020

¹ SESplan 2 is referenced here albeit it is acknowledged that the Proposed Strategic Development Plan (SDP) was not approved by Scottish Ministers. The SDP strategy and regional priorities however remain relevant and are the most recent expression of regional land use priorities. They are also generally consistent with the content of SDP1 (approved in 2013), which does remain part of the extant Development Plan for Fife.

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Annex 2 - NPF3

The key projects relevant to Fife within the published NPF3, include: -

- the specific identification of an Energy Corridor from Longannet to Methil was directly supported within NPF3, however, not as a national project;
- References are made to the National Renewables Infrastructure Plan;
- Reference is made to the completion of the Queensferry Crossing and the improved connectivity it will bring to the east coast;
- NPF3 also states that there should be a more concerted effort to maintain a generous supply of housing land in the SESplan area, an issue that is currently being addressed through FIFEplan. The plan also recognises Glenrothes, Dunfermline and Kirkcaldy as important centres for future growth including services and employment;
- Additional freight handling facilities on the Forth are also highlighted as a national project, focusing on existing or disused harbours and ports. Rosyth is specifically mentioned and supported by NPF3;
- A further relevant national development for Fife is identified under 'a natural resilient place' namely the inclusion of the Central Scotland Green Network;
- Recognition is given to the role and future potential of the Fife Coastal Path; and
- New and replacement facilities at four sites, where Carbon Capture and Storage related developments are proposed, are included collectively as a national development. One of the four is the former power station at Longannet.

Fife also suggested the following in its submission to NPF3: -

- The inclusion of an energy zone linking Methil and Rosyth as a national project was recommended to the Scottish Government alongside recognition of the connectivity and economic value served by M90 and A92 road corridors through Fife;
- The potential for the above corridors in accommodating freight, logistics or distribution activity in addition to the potential (at the M90 around Junction 4 and Junction 3 in Fife) for national leisure or conference facilities to be identified serving Central Scotland;
- The reintroduction into the NPF of the east coast knowledge corridor, including St Andrews;
- The opportunity to provide a spatial framework for wind energy; and
- The need to provide greater spatial guidance on growth and how it fits in with new infrastructure; with the possible introduction of areas of co-ordinated action to delivery land uses and infrastructure together.