

**REPORT TO: PLANNING AND TRANSPORTATION COMMITTEE - 12 JUNE 2006**

**REPORT ON: THE FINALISED FIFE STRUCTURE PLAN 2006-2026**

**REPORT BY: DIRECTOR OF PLANNING & TRANSPORTATION**

**REPORT NO: 335-2006**

## **1 PURPOSE OF REPORT**

- 1.1 To advise the Committee of the publication of the Finalised Fife Structure Plan, and seek approval for the Director of Planning and Transportation to submit formal objections and comments on behalf of the City Council to Scottish Ministers.

## **2 RECOMMENDATION**

- 2.1 It is recommended that the Committee
- a Notes that the Finalised Fife Structure Plan was submitted to Scottish Ministers on 5 June 2006, and that formal objections are invited by 17 July 2006;
  - b Notes that whilst the representations submitted by the City Council in response to the Draft Fife Structure Plan (Report 218-2005) in terms of housing land release have been partly taken into account the main objection regarding the extended timescale of the plan has not been accepted by Fife Council in the preparation of the Finalised Structure Plan;
  - c Approves this report which sets out Dundee City Council's formal objections and comments on the Finalised Fife Structure Plan and remits the Director of Planning and Transportation to submit these to Scottish Ministers.

## **3 FINANCIAL IMPLICATIONS**

- 3.1 There are no financial implications as a result of this Report.

## **4 LOCAL AGENDA 21 IMPLICATIONS**

- 4.1 The Development Plan is vitally important to managing the use and development of land in Fife. By its nature, it will impact on the full breadth of Local Agenda 21 issues. Of particular concern to this Council is the potential for increased need to travel for commuting and other purposes between Dundee and the level of housing land release that the Finalised Structure Plan proposes.

## **5 EQUAL OPPORTUNITIES IMPLICATIONS**

- 5.1 The establishment of an up-to-date strategic framework for land use planning is a basic essential for ensuring the equitable provision of facilities and services for all sectors of the community.

## **6 BACKGROUND**

- 6.1 Members of the Committee will recall that the Draft Fife Structure Plan was published for comment on 7 March 2005.

- 6.2 Dundee City Council made representations (Report 218-2005) on the Draft Plan.
- 6.3 Fife Council's response to the representations made by Dundee City Council (Report 218-2005) are contained in the Finalised Fife Structure: Plan Publicity and Consultation Statement published in April 2006.

## 7 FIFE COUNCIL'S RESPONSE TO REPRESENTATIONS

- 7.1 The response made to the City Council's representations was as follows:

### ***Dundee City Council Comment 01***

*Whilst the longer time period for the draft Fife Structure Plan reflects current Scottish Executive advice regarding strategic planning, this approach is not appropriate in the context of the proposed introduction of City Region planning. For the proposed City Region plans for Edinburgh and Dundee to be effective, it is vitally important that long-term strategic planning for the whole area is considered and established through this process. The current approach by Fife Council seeks to deny this by establishing a long term development strategy for Fife, undermining the ability of the proposed strategic development plan authorities to consider and progress their city region plans.*

### ***Fife Council Response:***

*Disagree. The Plan sets out an appropriate long term strategy to 2026 and beyond where development areas are known to have greater capacity.*

### ***Action:***

*No Change.*

- 7.2 The Planning etc (Scotland) Bill had not been published when Fife Council responded to the City Council's comments as outlined above. The Planning etc (Scotland) Bill was published on 19 December 2005 and sets out amongst other things the proposals for City Regions and Strategic Development Plans. The Bill is being considered by the Scottish Parliament and is currently advancing through Stage 1 considerations. Therefore proposals for City Region Strategic Development Plans are at a far more advanced stage than when Fife Council responded to the City Council's representations on the Draft Plan. In light of this it is considered that the response by Fife Council is unsatisfactory and fails to take into account imminent changes to the framework for development planning in Scotland. The previous concerns as set out in Report 218-2005 are all the more relevant given the Publication of the Planning etc (Scotland) Bill and should therefore be reiterated.
- 7.3 Members should also note that Edinburgh City Council also raised similar comments in terms of the extended time period of the Finalised Fife Structure Plan and the implications of this for City Region Strategic Development Planning.

### ***Dundee City Council Comment 02***

*The identification of significant areas for new housing close to Dundee would seem to represent a shift in the strategic planning approach from the current Fife Structure Plan, where it is a stated policy objective to constrain migration*

*led housing development. The development of a significant number of houses within and close to the greater Dundee housing market area has the clear potential to attract households from Dundee. This will undermine the development strategy of the Dundee and Angus Structure Plan which seeks to halt and reverse the trends of population decline. The promotion of significant housing development without associated economic development will also lead to increased commuting, putting further pressure on the Tay Road Bridge.*

**Fife Council Response:**

*Strategic housing allocations are now set out in Finalised Plan Proposal H2.*

**Action:**

*A range of changes have been made in finalising the strategic housing allocations as set out in the Finalised Plan at Proposal H2.*

- 7.4 It is noted that Fife Council have made a range of changes to the strategic housing allocations as set out in the Finalised Plan at Proposal H2. These changes are welcomed and address many of the initial concerns in regard to the level of housing land release proposed. The Council would oppose any argument to increase the level of housing land release over that currently proposed.
- 7.5 Notwithstanding this the City Council still has concerns with regard to the approach to Housing Land Release as set out in the Finalised Fife Structure Plan. Housing Policy H1 and Proposal H1 set out the Housing Land Requirement for the Plan period of 2006-2026 for each Housing Market Area. Of particular relevance to Dundee is the St. Andrews Housing Market Area where a shortfall of 3,150 houses over the plan period is identified. It is proposed to address this shortfall by New Strategic Land Allocations for 2600 houses and Future Local Plan Allocations for a further 550 houses. The St Andrews Housing Market Area includes the settlements of Wormit, Newport and Tayport which fall within the Greater Dundee Housing Market Area.
- 7.6 Housing Proposal H2 then sets out how the New Strategic Land Allocations will be broken down across the St. Andrews Housing Market Area. The allocations are broken down into two categories namely, Strategic Development Areas and Other Strategic Land Allocations. The Strategic Development Areas are focused around the main settlements in Fife. Within the St. Andrews Housing Market Area the only Strategic Development Area is St. Andrews itself. The other Strategic Land Allocations include the Tay Bridgehead (Tayport, Newport and Wormit), Leuchars/ Guardbridge and East Neuk settlements.
- 7.7 Housing Proposal H2 breaks down the New Strategic Land Allocations into 5 year time periods for the St. Andrews Strategic Development Area. It allocates 250 houses for the period 2006-11, 300 houses for 2011-2016, 350 houses for 2016-21 and 300 houses for 2021-26. However, Proposal H2 does not carry the same approach through to Other Strategic Land Allocations within the Housing Market Area. In terms of the Tay Bridgehead Area H2 allocates 500 houses for the period 2006-2026.
- 7.8 The main concern of the City Council is that the Finalised Fife Structure Plan lacks clarity over the phasing of these and the Other Strategic Land Allocations. It is possible that these could all be allocated in the Local Plan in the first part of the

Structure Plan period. This would undermine the development strategy of the Dundee and Angus Structure Plan which seeks to halt and reverse the trends of population decline. In addition, it would undermine the ability of the proposed strategic development plan authorities to consider and progress their City Region Plans.

- 7.9 In addition, to the above Housing Proposal H1 identifies Future Local Plan Allocations for a further 550 houses within the St. Andrews Housing Market Area. The Plan, however, does not provide sufficient clarity on the location of the 550 houses within the St. Andrews Housing Market Area or a timescale for the provision of them. As a result it is possible that a significant number of these could be allocated within the Greater Dundee Housing Market Area. This raises the same issues as outlined above in terms of the development strategy of the Dundee and Angus Structure Plan and the ability of the proposed strategic development plan authorities to consider and progress their City Region Plans.
- 7.10 The approach taken to Housing Land Release within the Finalised Fife Structure Plan raises potentially significant issues of concern for Dundee City Council in terms of the impact on the development strategy of the Dundee and Angus Structure Plan and the pre-empting of the role of City Regions in preparing Strategic Development Plans. Clarification is required with regards to how the Other Strategic Land Allocations and Future Local Plan Allocations are to be broken down over the Plan period.
- 7.11 Edinburgh City Council also raised similar comments in terms of the allocation of Housing Land Release within their Housing Market Area.

### ***Dundee City Council Comment 03***

*Proposals in the Draft Plan relevant to Dundee City Council are the proposed new rail station at Wormit and a Park and Ride facility at Tay Bridgehead. These proposals seek to encourage more sustainable transport. However, it is noted that whilst a new rail station at Wormit was considered, it was not supported by the Tay Estuary Rail Study. The viability of this proposal is therefore questioned.*

#### ***Response:***

*Support noted. Proposals for a new rail station at Wormit will be pursued through the Local Transport Strategy and Area Transport Plan.*

#### ***Action:***

*No Change*

- 7.12 The Council would still question the viability of the proposal for a new rail station at Wormit and whether it provides a sustainable approach.

## **8 NEXT STAGE**

- 8.1 The Finalised Structure Plan was approved on the basis of the above by Fife Council on 27 April 2006 and was submitted to Scottish Ministers on 5 June 2006.

8.2 In light of the above, it is considered that Fife Council has failed to adequately respond to the concerns raised by the City Council with regards to the extended timescale of the Finalised Fife Structure Plan and Housing Land Release.

8.3 It is considered that formal objections be made to Scottish Ministers.

## **9 CONCLUSIONS**

9.1 Dundee City Council wishes to make the following objections to the Finalised Fife Structure Plan.

### **Dundee City Council Objection 1**

1 Whilst recognising the statutory requirement that development plans be regularly reviewed and kept up to date, the publication of the Finalised Fife Structure Plan must be seen within the context of imminent changes to the framework for development planning in Scotland.

These changes will include a requirement that strategic development plans should be prepared for the Edinburgh and Dundee City Regions. It is entirely appropriate that the Strategic Development Plan Authorities charged with the responsibility of preparing City Region Plans for Edinburgh and Dundee are able to consider the role that appropriate parts of Fife should play in meeting strategic planning objectives.

The advancement of the Finalised Fife Structure Plan 2006-2026 over a 20 year period is considered to be inappropriate and will clearly constrain and undermine the ability of the City Regions to prepare their Strategic Development Plan. In light of the timescales involved, which will likely see work commence on City Region Plans prior to the approval of the Fife Structure Plan, it is requested that Scottish Ministers modify the 20 year timescale of the Finalised Fife Structure Plan.

### **Dundee City Council Objection 2**

2 The proposals in the Draft Fife Structure Plan sought to release a significant amount of housing land within and close to the Greater Dundee housing market area and raised significant issues of concern for the City Council.

It is noted that Fife Council have made a range of changes to the level of strategic housing allocations as set out in the Finalised Fife Structure Plan at Housing Proposal H1 and H2 in response to the City Councils representations. These changes are welcomed but the City Council would not support an argument to increase the level of housing land release over that now proposed.

Notwithstanding the changes made the approach taken to Housing Land Release within the Finalised Fife Structure Plan still raises potentially significant issues of concern for Dundee City Council in terms of the impact on the development strategy of the Dundee and Angus Structure Plan and the pre-empting the role of City Regions in preparing Strategic Development Plans.

It is requested that Scottish Ministers seek clarification of how the Housing Land Release as set out in Housing Proposal 1 and 2 is to be allocated over

the plan period. In particular with regard to 'Other Strategic Land Allocations and Future Local Plan allocations'.

## **10 CONSULTATIONS**

- 10.1 The Chief Executive, Depute Chief Executive (Support Services), Depute Chief Executive (Finance) and Assistant Chief Executive (Community Planning) have been consulted and are in agreement with the contents of this report.

## **11 BACKGROUND PAPERS**

- 11.1 Draft Fife Structure Plan 2006-2026 (7 March 2005)

Report 218-2005 to Dundee City Council Planning and Transportation Committee 18 April 2005

Finalised Fife Structure Plan 2006-2026 (Approved on the 27 April 2006)

Finalised Fife Structure Plan 2006-2026: Publicity and Consultation Statement April 2006

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