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Royal Burgh of St Andrews Community Council

Agenda - April 2001

There will be a meeting of the community council at 7pm Monday 2nd April in the Burgh Chambers of the Town Hall. There will be a short break at about 8pm when the 200 Club draw will be taken.

1. Attendance

2. Minutes of March 2001

(read for accuracy in matters of substance - harangue the secretary for minor (spelling etc) errors outwith the meeting)

3. Presentations

(For anyone wishing to address the meeting on a matter relevant to St Andrews. Please contact the Secretary or Chair before the meeting. Priority will be given to those who have been invited to speak or have given advance notice)

3.1. Community Policing report

4. Fife Councillors

4.1. Frances Melville (West)

4.2. Jane Hunter-Blair (Central)

4.3. Sheila Hill (South)

4.4. Jane Ann Liston (South East)

5. Planning Committee Report

(Feb 2001 meeting agreed that planning was too important to squeeze into the end of the meeting with other committees.)

(Appendix A - Response to the finalised Fife Structure Plan)

6. Matters Arising from previous meetings

6.1. West Port Flagpole

(March 4.3.2.) I have spoken to Doreen Grove, an Inspector (Keeper?) of Monuments at Historic Scotland who has responsibility for the West Port, to emphasise Community Council's desire that the St Andrews Cross should continue to fly over the West Port. She said that the pole itself is unsafe and will have to be replaced/repaired soon. She had doubts about the appropriateness of the flagpole, feeling it to be 'out of scale' with the West Port, but admitted there were far worse problems with the surroundings and would be happy for

it to be retained in view of local feeling. She also said that the floodlight supported over the gateway by a piece of scaffolding tube is not theirs and will probably be removed at the same time. She was interested to hear of potential TMP/Scottish Enterprise (Fife) improvements in the area and will be interested working with any such initiative.

Pete Lindsay

6.2. Licensing Hours - Public Meeting

7pm, Thursday 5th April, Town Hall. The East Fife Divisional Licensing Board is holding public meetings as part of its review of regular extensions to the permitted hours. The Board would like to hear views from the public on any matter related to extended hours, especially late night opening hours after 11pm. The Board will take these views into account when it decides on a policy or guidelines for future extended opening hours. As well as the public meeting comments may be sent in writing to the Board

7. New Business

7.1. Pharmacy Strategy for Fife

The Centre for Health and Social Research are consulting on this on behalf of Fife Health Board. They are particularly interested to hear the views of the general public and their representatives on how they use pharmacies and any changes they would like to see. There will be a meeting/seminar at 2.30pm Mon 9/4/01 in the Town Hall.

Can anyone attend?

7.2. Fife Health Board

Fife Health Board will be holding its next Monthly Bard meeting at 11am Tue 10/4/01 at the Gregory Hall, Tayport. Public Welcome. Contact Ian T Deal (PR Manager) on 01334-421102 with any enquiries.

8. Reports from Officers

8.1. Chair

8.2. Treasurer

8.3. Secretary

9. Committees

9.1. Publicity

9.2-x. Other committees

10. AOCB

If members intend to raise items under AOCB please let the Secretary or Chair know before the meeting. Remember, unless it is urgent, placing items on the agenda for next month's New Business would be more effective...

Appendix A

Response to the Finalised Fife Structure Plan

Overview

1. We set out in detail below our objections to the Finalised Fife Structure Plan. These are, we regret, rather more numerous than we might have hoped at this stage in the procedure. We are happy to acknowledge that the local authority has taken on board a substantial number of our earlier comments, but there still remains a range of concerns on which their response appears to us inadequate. We also noted with some surprise the extent to which the Written Statement of the Finalised Plan differs from the Consultative Draft. The Written Statement includes a sizeable amount of new material, and indeed a selection of new policies, on which the public have had no earlier opportunity to comment. There has also been a substantial amount of reformulation of material that was previously present, giving the lay reader considerable difficulty in judging the effects of omitting clauses or transferring them from one policy to another. It is equally unsatisfactory that the public has had little time to assess the implications of discarding large swathes of the Consultative Draft.

Strategic Studies

2. The Community Council has previously requested that Chapter 1 should indicate that the Strategic Studies for Central Fife and St Andrews had formed one of the inputs shaping the production of the Structure Plan. Chapter 1 has now been amended to restrict discussion of the planning context to its European and national setting. Surely there should also be mention of the local planning context under which the Structure Plan was created, and, in particular, of documents which were required by the then Secretary of State to guide the Structure Plan process, approved by the Fife Council and accepted by the Scottish Executive. In October 1997, the Fife Structure Plan Draft Alteration No.1 (Housing) spoke of "the importance of the findings of the Studies in developing future strategy and in informing the Structure Plan review process". That importance should now be acknowledged in the Structure Plan itself.

3. The St Andrews Strategic Study, published in October 1998, is the fruit of over four years of research and represents the most recent statement of strategic development policy for the town, informed and empowered by a level of public participation unparalleled in Fife. Yet, since its publication, reports by planning officials have tended to dismiss it as a "non-statutory document." Nevertheless, we note that a highlighted sentence on page 12 of the St Andrews Strategic Study report itself says "All the conclusions set out in this report will provide the basis for the relevant aspects of the review of the Fife Structure Plan and the St Andrews Area Local Plan". The Fife Structure Plan should provide as full a description as possible of the planning context in which the next Local Plan is to be produced, and should therefore give statutory weight to the need to use the Strategic Study as a basis for the Local Plan.

Policy SP1: Sustainability

4. Whilst some of the sentiments contained in this policy were obviously implicit in the Consultative Draft, this is the first time that the policy as such has appeared in the Structure Plan. Para. 1.2.6 says that Policy SP1 "seeks to ensure that sustainability is at the centre of the decision-making process". Although we are happy to endorse this goal, it does not appear to us satisfactory that this key guideline should rest on a policy - the "Council's Sustainability Policy" - which remains undefined in the Written Statement itself. This approach runs contrary to para. 1.1.4 which indicates that the background research is given in the Report of Survey, and the "policies, proposals and their justifications" in the Written Statement. The assertion in para. 1.2.6 that "Policy SP1 sets out the Council's sustainability policy" is thus visibly untrue.

5. The Report of Survey says that it lists the Council's Principles of Sustainability "to assist in the implementation of the Sustainability Policy, Policy SP1". The language is imprecise, but is presumably intended to imply that the Sustainability Policy is equivalent to the Principles of Sustainability. The principles listed are indeed all very worthy: no one is likely to object this selection of "motherhood and apple pie" sentiments. As a basis for planning policy, however, the list suffers the same defect that we have had to highlight elsewhere in the Structure Plan, namely the lack of the necessary prioritisation. In the absence of any clear statement of priorities, the sustainability policy may well offer no clear guidance on major planning applications.

The need for prioritisation

6. The failure to prioritise policies was a major shortcoming of the last Structure Plan, resulting in major problems in processing recent high profile planning applications. Fife Council's planners supported the Kingask and Scooniehill developments on economic grounds, but both of these applications in Areas of Great Landscape Value were rejected on environmental grounds by local councillors and also, in the case of Scooniehill, by a Scottish Executive Reporter.

7. In particular, the Principles of Sustainability offer no progress on issues of this nature. The principle which aims to "protect and enhance the visual landscape and townscape" would have supported the majority of local opinion in rejecting the Kingask application, whilst that which aims to "promote access to worthwhile and productive jobs" could presumably have been used to justify the stance of the councillors and officials who supported it.

8. Para. 1.2.8 says that one of the three practical tasks that the Structure Plan needs to fulfil is "to provide unambiguous policy guidance for preparing Local Plans and making policy decisions". Although the problem is not as acute in the new Structure Plan as in the old, the failure to indicate, or give guidance, as to which policies are the dominant ones still permeates certain parts of the Plan, as we indicate below. Consideration of how it would have affected the determination of the recent golf-related developments does indeed provide an acid test of whether the new Plan is meeting its goal of "unambiguous policy guidance". If planners are able to "cherry pick" the policy which suits their perceptions, then the system is wide open to abuse.

9. As the Kingask and Scooniehill examples illustrate, the lack of prioritisation between the policies in the Plan is particularly serious where environmental and economic policies both have a bearing on a proposed new development. For example Policy N1 appears to give a presumption against development in Areas of Great Landscape Value (AGLVs). Yet proposal PE1 seeks to encourage and identify opportunities for new businesses in rural areas; policy E4 seeks to support employment-generating initiatives in rural areas and policy E6 gives support to visitor developments where they would expand the tourist trade, provide local employment. Paragraph 2.3.9 makes specific mention of job creation in rural areas being particularly beneficial. Policy C4 says that golf courses will be supported provided that they "...secure economic and employment benefits...". New golf courses are most likely to be rural and in the case of St Andrews located in AGLVs. The conflict between N1 and these other policies is apparent.

Policy SS8: Landscape setting of St Andrews

10. Policy SS8 dealing with the St Andrews Green Belt has an outward appearance of providing some protection for the town. The policy as stated, however, is weak and seems to be solely concerned with protecting views to and from the town. Before being further qualified, the presumption against development is restricted to sites where there is intervisibility between the development and the town's historic core. There are several reasons why this is unsatisfactory.

11. Firstly, although we would agree that, in terms of the standard criteria given in Circular 24/1985, the main reason for having a Green Belt for St Andrews is to conserve the landscape setting of the town, we do not believe it is helpful or adequate to define the setting of the town merely in terms of those places where there is intervisibility with the town. Whilst the preservation of the "green bowl" in which the town is set must clearly be the primary goal, the setting of the town, and its attraction to the tourists on whom many local residents depend, would be seriously diminished, for instance, if an urban sprawl were to be permitted just over the brow of the southern hillside. In cases such as Edinburgh, with its relatively narrow Green Belt, the problems caused by "leap-frogging" the belt are well documented. It should also be borne in mind that the local topography of St Andrews is such that, in many of the more distant views of the town, many of the prominent points on the skyline do not themselves have inter-visibility with the town.

12. Secondly, para. 1.2.35 shows that another purpose of the Green Belt is to provide a long-term boundary to prevent urban sprawl, again showing that the Belt has a greater function than just protection of intervisibility. The accompanying document "Report of Survey" (1.2.36) makes it clear that the green belt policy will be stronger than that set out in Circular 24/1985 and will not apply the exceptions to presumption against development set out in that document.

13. Thirdly, Policy SS8, as written, rests heavily on the concept of the "historic core". This is a late addition to the Structure Plan which was not present in the Consultative Draft, dated February 2000, and which has not therefore been exposed to public scrutiny prior to this stage in the process. Policy B2 says that "Local Plans will define historic cores". Whilst one would not expect precise geographic specifications in a Structure Plan, we note that there is not even a general definition of the term "historic core" in the Glossary. Despite this, the photograph below Policy SS8 purports to show the historic core of St Andrews. As it stands, the concept of the historic core is too nebulous to form the basis of Structure Plan policies, which, as we in St Andrews have seen all too often, need to be able to stand up to quasi-legal scrutiny in Public Inquiries. Policy SS8 would be much firmer if it were based on the existing well-defined Conservation Areas.

14. The manner in which the location of the Green Belt for St Andrews is defined is much too imprecise to be considered satisfactory. The incantation of points of the compass could only provide a workable definition if all the bearings were taken from a single uniquely defined point in the town centre. In the absence of a unique centre point, there is scope for endless argument about whether, for instance, a particular site lies to the west or the south-west of the town. Policy SS8 omits mention of the south-westerly direction, and yet simple inspection of a map shows that most definitions of this direction will include substantial areas of relatively high ground where any development would be extremely damaging. Parts of this area should clearly be included in the Belt even under the restrictive "intervisibility" criterion proposed by Fife Council. Nevertheless, rather than resorting to more intricate compass bearings, we indicate below how a clearer definition of where the Belt should lie can be obtained by considering the underlying principle that the Fife Council planners are attempting to encapsulate.

15. Although strongly supportive of the general concept of a Green Belt for St Andrews, the Community Council has always accepted that the development of St Andrews cannot be rigidly constrained. We therefore do not support those individuals who call for the Green Belt to encircle tightly the existing built-up area on all sides. For the foreseeable future there will, for instance, be a need for more affordable housing to reduce the number of employees who need to commute into the town and to stop the young people of the town needing to move away to find accommodation. Accordingly, we have consistently urged that limited development of this type should be permitted, and that it should be along the relatively low-lying valley of the Kinness Burn. This location would have a minimal impact on the views into and out of St Andrews.

16. This stance has met with strong local support, and it looks as though the wording of the policy is an attempt to implement this view. The intention could, however, be achieved much more neatly and precisely by explicit reference to the valley of the Kinness Burn rather than by the omission of a particular direction from an ill-defined list of compass points. Bearing in mind the standard criteria for a Green Belt, we would also propose that the wording be chosen to remove the, admittedly long-term, danger of coalescence with Strathkinness.

17. We therefore propose:-

Policy SS8

Green Belts will be identified to the West and South-West of Dunfermline and on all the landward sides of St Andrews to limit urban expansion and to preserve the landscape setting, conserving in particular the existing views to and from the Conservation Areas in these towns. In the case of St Andrews, limited amounts of land in the valley of the Kinness Burn will be omitted from the Belt to meet present and future local housing need. There will be a presumption against all development in the Green Belts unless it would enhance the quality of the Belts or result in no material alteration to them. Local Plans will identify Green Belt boundaries. Development proposals likely to prejudice this process will be considered premature.

18. If wording to this effect were adopted, the guidance in para. 2.1.16 could also be suitably tightened. At present, it contrasts unfavourably with the corresponding wording in para. 2.1.12 relating to SS7. The phrase "some boundaries may not be contiguous with the existing settlement boundaries" offers too many hostages to fortune. Given a reference to the Kinness valley in the policy, we, for our part, would prefer the omission of this phrase and the modification of the final sentence to read "the precise inner boundaries will generally be the existing and currently planned boundaries, except where explicitly indicated in the Policy."

Policy T1

19. This policy sets out necessary conditions for development proposals to be acceptable, but these conditions are not in themselves sufficient for acceptability. Satisfying the conditions should not therefore generate any presumption in favour of development. We still believe therefore that the wording of Policy T1 should be altered to: "Development proposals will not be supported unless they ..." To stress the need to comply with all the different bullet points, the word "and" should also appear at the end of each clause.

Proposal PT2 : Transport Proposals

20. We would reiterate our strong belief that the line of the proposed rail link from Clayton to St Andrews, as identified by the Fife and South Tayside Rail Study, should be protected from development. This proposal is entirely consistent with the sustainability philosophy of the Structure Plan which seeks to promote environmentally-friendly forms of transport. Fife's Strategic Development Committee has already agreed that the position of a St Andrews rail link should be reviewed, and the decision to postpone it for up to 10 years appears, as far as we are aware, to have been taken by officials. The Structure Plan review in 2006, mentioned in Fife's response to our proposal, will be too late to safeguard the route from prejudicial development in the next Local Plan.

21. An appeal against refusal of planning permission for a proposed hotel development on the line of this rail link was recently turned down after a Public Inquiry, but, given the strength of development pressures in the St Andrews area, that is unlikely to be the end of the matter. The town is thus likely to face the permanent loss of this route, and, even if another less suitable possibility can be found, there will be a consequent severe escalation in the cost of relinking the town to the East Coast Main Line.

Policy T4

22. Policy T4 is unsatisfactory. In response to our comments on the wording of this policy Fife Council responded that the policy had been amended accordingly and now includes a reference to the need for legal agreements. Policy T4 merely refers to "...appropriate planning or other agreements". Such agreements need not be legally binding. The policy needs amendment.

23. Policy H1 : Housing Land Requirement

The Community Council does not wish to object to the conclusion, given in Schedule H1, that there is no shortfall in the housing land supply in the St Andrews Housing Market Area. We do not, however, endorse the figure of 640 units as the Housing Land Requirement (HLR) for the St Andrews Area. We note that the projected Household change for Fife represents a 13% increase in the projected figure used in the Consultative Draft, and the HLR for Fife has risen by a comparable amount. The decomposition of the HLR between the three Areas in Fife has, however, changed markedly, with both the East Area in general, and the St Andrews Area in particular, showing a 23% increase on the position a year ago. This decomposition remains largely unjustified in the Report of Survey, which says rather vaguely in para. 4.4.44 that the level in East Fife "complements the strategy for Central Area". Moreover, whilst the Community Council supports the strategy of restraining migration-led housing growth in East Fife, Fife Council does not appear to have addressed our concern on the disaggregation of the Housing Land Requirement for the East Area into those for the respective Housing Market Areas.

Policy H2 : Meeting the Housing Land Requirement

24. We wish to reiterate our objection to the clause relating to housing densities. This implements Policy H4, to which our objections are as follows:-

Policy H4 : Density of housing development

25. The objectives of this policy are again laudable, but its formulation is still as naive as the exercise in primary school mathematics which, despite our earlier comment, is again reproduced in para. 4.4.13 of the Report of Survey. Fife Council's response to our criticisms of the policy is also inadequate. The cross-referencing with other policies, to which the Council alludes in its response, is incomplete and fails to

acknowledge the conflict between this minimum density policy and the policies on the Built Heritage, including in particular Policy B2 on Built Heritage of International and National Importance.

26. In our previous response we said,

"The desirability of avoiding wasteful use of greenfield sites must be counter-balanced by the desirability of making the urban environment visually attractive and a pleasant place for people to live. The 1960s tower-blocks were superbly economical in their use of land, but most of the time they failed to create a human environment. As it stands, Policy H3 (now H4) is simplistically worded and we doubt whether all its implications have been appreciated. The policy does not debar the occupiers of these high-density homes in town centres from possessing motor vehicles. There is also no requirement that the developer provide off-street parking. The additional demand for on-street parking could cause complete chaos in some town centre contexts.

Marked contrasts between the densities of adjacent development, particularly in town centres and in Conservation Areas can also seriously detract from the visual attractiveness of an area. Demanding greater densities in town centres will further encourage developers to add extra storeys to proposed buildings leading to heights which are not compatible with neighbouring properties."

27. Thus we have here another failure to resolve questions of priority. Does the density requirement or the heritage requirement take precedence? We therefore propose that this policy be qualified in a number of ways:-

- (a) Conservation Areas should be specifically excluded; and
- (b) It should specify the minimum size of development to which it applies; and
- (c) It should offer exemption if the implied height or density would detract from the appearance of the street or area.
- (d) It should address the question of motor vehicle ownership by the occupants.

Section 6 : Infrastructure and Community Facilities

28. We wish to object to the deletion of Policy C5 of the Consultative Draft relating to proposals for new or expanded school provision. Although we were unable to endorse this policy as it stood, and believed it needed amendment, we see the complete lack of a policy on new school provision to be contrary to both central government policy and the wider objectives of the Structure Plan.

29. Our concerns over school provision in North East Fife, arising from the severe overcrowding in Madras College, were dismissed by the planners as not being a strategic planning issue and due to lack of provision in the Council's Capital Plan. The introduction of a new secondary school to meet the expanding population of N E Fife is in our opinion very much a strategic issue that the Council should be addressing. The strategy of "Shaping a More Sustainable Fife", outlined on page 2 of the Structure Plan, aims to create a strong diverse and competitive economy, to improve the quality of life and to work towards strong vibrant and healthy communities. For many communities in Fife these goals cannot be achieved without a policy on new school provision.

30. Para. 1.1.1 says that the Structure Plan takes a broad overview of ... development across Fife and sets out the Council's strategic planning policies. In our view the necessity for a new secondary school in N. E. Fife is a strategic planning issue that the Council should be addressing now. The lack of a secondary school in the Tay Bridgehead area adds significantly to housing demand in St Andrews, since, if it is feasible for them to do so, parents naturally prefer to have their homes close to Madras College in St Andrews rather than having their children spend an hour and a half a day on school buses.

31. We have also previously noted that "in many parts of this Structure Plan, the need to eliminate unnecessary travel is recognised, and reference is made to government guidance given in NPPG17 : Transport and Planning. It would indeed be ironic if children were to be the one group in Fife who are denied positive thinking of this nature. In St Andrews, school buses also cause problems through the necessity of using unsuitable roads in residential areas, and add significantly to traffic management problems in the town centre. A reduction in the number of buses allocated to school services would also assist in the provision of service buses for some of the

commuters who at present are offered no alternative to using their cars."

32. This is clearly not a matter that can be resolved in the St Andrews Area Local Plan: it is a strategic issue affecting N. E. Fife as a whole. There is no need to identify a specific site; however a statement that a site will be identified in the next Tay Coast Area Local Plan would be appropriate and widely welcomed. This would not require insertion into the Council's Capital Expenditure Plan until a planning decision in principle to identify sites had been approved.

Policy B1 : Protection of the Built Heritage

Policy B2 : Built Heritage of International and National Importance

33. We wish to object to the reformulation of Policy B1 which has occurred between the Consultative Draft and the Written Statement. The previous approach, which recorded the circumstances in which development would not be permitted, is clearly stronger and more likely to achieve the aims of the policy. The introduction of Policy B2 on Built Heritage of International and National Importance is not an adequate substitute due to its reliance on the ill-defined concept of the historic core. Our objection could alternatively be met by making the first sentence of Policy B2 refer to Conservation Areas, with the consequent change that only the Bridge landfall need be defined in a Local Plan.

Proposal PC2 : Hospital

34. Fife Council has argued that the wording of this proposal is sufficient to protect any site identified for the new hospital. As the Council offers no reason to justify its view, we would propose that the words "This site will be safeguarded from prejudicial development" be added to this proposal. We note that this phrase is felt to be necessary in Proposal PC1 for programmed infrastructure and in Proposal PT2, which requires the identification of land for transport facilities.

Policy C4

35. Policy C4 on golf-related developments is still in our opinion unsatisfactory. To say that new developments will be supported provided that they meet certain conditions does not mean that developments failing to meet one or more of those conditions will not be supported. This is unsatisfactory and probably contrary to the intentions of the planners who drafted the plan. Far better would be to say: "new player/visitor facilities will only be supported if they are...".

Policy N6 : Development on the Undeveloped Coast

36. This policy omits the reference to "adverse impact on landscape and conservation interests" which was present in the Consultative Draft. To avoid dilution of the policy we would wish to see the re-insertion of this reference. This could be achieved by a bullet point "avoids adverse impact on landscape and conservation interests", linking it to the other bullet points with the conjunction "and" in order to make it an additional requirement. As it stands, Policy N6 offers less protection to the unbuilt coast than the unequivocal Policy E13 in the present Structure Plan which said, "The strategy of the Structure Plan does not support development ... that would have a detrimental effect on the unbuilt coastline".

I.B.J.Goudie, Convenor, Planning Committee.

Appendix B

Correspondence

Date	in Who	Subject	
6/3/01	o Environmental Health	Craigtoun Rd Street Names	fax
9/3/01	i NEF Local Healthcare Co-op	Community Meetings 12/25 April	f
9/3/01	i Transportation Service	Millennium Cycleways leaflets	f

12/3/01 i	Community Services	Tentsmuir/Eden Estuary liaison group	14/3/01	f
12/3/01 i	Scottish National Heritage	Magazine 2001		f
17/3/01 i	Centre for Health & Social Research	Pharmacy Strategy for Fife		f
18/3/01 I	Stephen Younger	Streetnames		KF
20/3/01 I	Dept Trade & Industry	Post Office network - govt policy & initiatives		
27/3/01 I	Fife Health Board	Board Meeting 11am 10/4/01 Gregory Hall, Tayport		F
27/3/01 I	CVS Fife	Feb/Mar newsletter		F
27/3/01 I	Law & Admin	Dunfermline & Coast Assn of Community Councils		F
29/3/01 I	Law & Admin	Licensing Hours Public Meetings		F

St Andrews Pothole Watch

List: Potholes (40mm/1.5in) in the road, damaged pavements (20mm/.75in), missing or damaged toby covers, blocked drains, floods, defective streetlights etc.

Identify the location (Street and number on closest house or streetlight for instance).

Hand to Community Council Secretary Pete Lindsay or to Fife Roads Service.

Defect & Location