



THE ROYAL BURGH OF ST ANDREWS COMMUNITY COUNCIL

8th October 2013

Attention: Mr. Darren O'Hare
Development Central
Enterprise, Planning and Protective Services
Fife Council
Kingdom House
Glenrothes KY7 5LY

Dear Mr. O'Hare,

**13/02583/EIA - Planning Permission in Principle for the erection of a secondary school (Class 10)
with associated facilities including access, car parking/bus stance, playing fields, regrading of land
and alterations to path
Land To The North Of Pipeland Farm Largo Road St Andrews Fife**

The Royal Burgh of St. Andrews Community Council (StACC) wishes to lodge an OBJECTION to the above noted planning application.

The StACC wishes to OBJECT to the proposed development for the following reasons:

1. Significantly Contrary to the Development Plan (Both TayPlan and the St. Andrews and East Fife Local Plan)

The proposed development is contrary to the following TayPlan Policies:

- Policy 2B of the TayPlan in that it does nothing to reduce the need to travel, because this development sites the school further away from the locations where most children live.
- Policy 2E and Policy 6 of the TayPlan, as it does nothing to "reduce the carbon emissions" or "move toward a low/zero carbon future".
- Policy 3 as it fails to "continue to designate and protect the Green Belt around St. Andrews. It does not protect Prime Agricultural Land."

Also within the TayPlan, the proposed development fails to meet Action Plan Item 17 which has been designed to reduce the air pollution within St. Andrews. The proposal does nothing to reduce



the number of buses nor the distances that they will travel. The buses that currently go to the South Street Campus will actually travel further.

The proposed development is contrary to the St. Andrews and East Fife Local Development Plan (October 2012) as it fails to meet the following policies and guidelines from the plan:

- Paragraph 18 details that the Green Belt boundaries have been set for 20 years and will be "subject to a review in 2028".
- Paragraph 75 details that the "In defining the Green Belt, the Council has decided that the boundary should endure and not be subject to frequent revisions to meet new development needs".
- Policy E1 details that developments should not be allowed to increase the town envelope unless it is consistent with all local plan Policies from E15 to E29. As detailed below, we note that the proposed development is not consistent with all of these Policies.
- Policy E15 does not allow for the development of a school within the countryside.
- Policy E17 details the protection of the Green Belt for St. Andrews and does not provide any exception for a development within the Green Belt on the southern hillside of St. Andrews.
- Policy E18 does not allow for the irreversible development of Agricultural Land, especially since this area has been defined as Green Belt and not an area zoned for development in the local plan.
- Policy E19 does not permit a development in a "Local Landscape Area" if it will have a significant adverse effect on the landscape qualities. It is the view of the StACC that current proposals do not meet the requirements of this policy. A school will clearly impact upon the landscape qualities of the southern hillside.

2. St. Andrews Green Belt

Since 1994, when a Green Belt for St. Andrews was proposed in the St. Andrews Strategic Study, residents and voluntary bodies in St. Andrews have been campaigning for a Green Belt to protect *'the most important small historic burgh in Scotland'* (Historic Scotland).

In February 2010, when refusing an appeal about a hotel on the southern hillside, a Scottish Government Reporter said:



' ... my decision rests on one principal issue - the protection of the landscape setting of St. Andrews . . . the protection of the setting of the town is of vital importance to its future as a medieval borough of international renown... This protection is now being confirmed by the establishment ... of the green belt, long considered essential for the protection of the town's setting.'

There is nothing in the Local Plan Green Belt policy (E 17) which supports the building of a new school (potentially the largest building in St. Andrews) on the Pipeland Farm site. There are three 'exclusions' in the policy (areas which are in Green Belt but not subject to the constraints of Green Belt) – Craigtoun Country Park, the Old Course Hotel, and the Links. No other areas are identified as being acceptable in Green Belt.

The Local Plan was started in 2002 and eventually adopted in October 2012. Within a few months Fife Council stated its intention to press for a school in Green Belt. It is ignoring its own statutory policies, and setting a dangerous precedent for the future of the Local Plan and protection of the town. The Muir Group's aim to build on the southern hillside has been clear for 20 years. Its long-standing relationship with Fife Council, and the Council Education Service's support for this proposal, means that the town's Green Belt is being regarded as expendable by a branch of the organization responsible for defending it. The StACC contends that this is a totally unacceptable position.

3. Scottish Planning Policy was taken into account by the Reporters

The StACC notes that the Non-Technical Summary of the Environmental Statement relating to this application states that the proposal is significantly contrary to the development plan (the TAYPlan and the St. Andrews and East Fife Local Plan), and lists the policies with which it conflicts – Green Belt, Countryside, Prime Agricultural Land, Development Outwith Town and Village Envelopes, and others.

It goes on to say that:

' ... Scottish Planning Policy is a material consideration and it is national policy that development in the green belt may still be considered appropriate either as a national priority or to meet an established need if no other suitable site is available ... '

The current Scottish Planning Policy was approved in February 2010, two and a half years before the Local Plan was adopted in October 2012. The Reporters would have taken it into account before producing their lengthy (over 700 pages) examination report, in which they said that



‘development in this area (Pipeland Farm) would also be detrimental to the landscape setting of the town’, and that the land owned by the Muir Group, including the site proposed for the school, should ‘remain as part of the green belt’.

Scottish Planning Policy may be a general material consideration, but it is not site specific, and cannot override site specific decisions made by the Local Plan Reporters. Nor can it be said that there is no other suitable site available. Until recently the site favoured by Fife Council was a rebuild at Kilrymont. A North Haugh site was recommended by the Reporters, and this also has to be ‘taken into account’ – Fife Council has very limited authority to depart from the Reporters’ recommendation, and the North Haugh site to the west of St. Andrews would be far more suitable than Pipeland.

4. Alison Grant Landscape Study

The StACC notes that the Alison Grant Landscape Capacity Assessment and Green Belt Study of St. Andrews was a requirement of the Fife Structure Plan 2002. It was commissioned by Fife Council and published by the Council in 2003. It is a material consideration for the application for a new school on the site at Pipeland Farm.

Ms. Grant’s very detailed Study did not identify any area round St. Andrews as suitable for major development. She assessed the landscape as falling into 3 categories: Category 2 – *‘capable of limited development...’*, Category 3 – *‘capable of some development...’* and **Category 5 – ‘development is inappropriate because of its potential impact on the landscape character, scenic quality or visual attributes of St. Andrews and its setting’**. Virtually the whole of the southern hillside, including the **Pipeland Farm site, falls into Category 5**, as well as being designated as ‘Green Belt’ by Reporters in the Local Plan which was adopted in October 2012.

Ms. Grant is a landscape architect, and her views should be given considerable weight. Fife Council does not have any employees with landscape qualifications, and the Study is the most recent landscape capacity assessment published by Fife Council. It is difficult to see how Ms. Grant’s Study, together with the statutory policies in the recently adopted Local Plan, can be overridden if the Council and the development plan are to retain any credibility.

5. Excessive Budget

The StACC objects to the excessive additional costs that are associated with the proposed building of the school at Pipeland Farm. Examples of these costs are:



a. Cost of Land

The proposed site is agricultural land within the St Andrews Green Belt. Agricultural land in this category normally sells for £ 6000 - £7000 per acre in the St Andrews area. The site was valued at £160,000 by an independent property specialist in August 2012. Fife Council intends to purchase the land from the Muir Group for £1.8 million. That equates to 10 times the normal going rate.

The StACC is also led to believe that the above land cost does not include the land for the old waterworks in the middle of the site. We understand that Fife Council has estimated the cost for this land at £300,000 before any costs are incurred to remove the old waterworks and piping.

The StACC believes this overvaluation of the Pipeland Farm land and Waterworks is unacceptable.

b. Removal of Gas-Main

The StACC understands from the documents and other correspondence that a 4-inch steel Intermediate Pressure Gas Main runs for east to west across the site, and another smaller Intermediate Pressure Gas Main runs north to south across the site. Fife Council's own estimate to remove the Gas Mains is £750,000.

The StACC believes this additional cost makes the site too expensive in comparison to the other options available to Fife Council.

c. Excavation of the Southern Hillside

The StACC also objects to the un-necessary excavation of the southern hillside in order to provide level ground to site the school and playing fields. None of the other sites for the school suffer from this problem. It is understood that more than £1M will be necessary to provide appropriate levels on the site.



d. High Quality Building Materials

As noted by Fife Council in their rejection of the Station Park option to build the school, they indicated a reason for not building the school there was the Fife Council estimated cost of £900,000 for higher quality building materials that would need to be used in such a sensitive area.

Since the Green Belt Policy requires that a highly visible building in Green Belt would be in such a sensitive area, the StACC objects to planning to build the school here that requires such un-necessary cost.

The StACC understands there are many more exceptional costs associated with this particular Pipeland Farm site. The above £5 Million cost of the exceptional items is more than the cost of any other site in and around St. Andrews, and we object to this waste of public funds.

The StACC believes that the limited funds available for the new Madras college should be spent on the fabric and facilities of a new school and not on land that gives all the appearances of being grossly overvalued and the other emerging exceptional costs that would not be encountered at any another site.

6. Excavation of the Southern Hillside

The StACC objects to minimal coverage of the excavation costs for leveling the site (see excessive budget costs above). This excavation of soil and rock will present as a huge impact on the resources which have been delegated for the cost of the new build. To even consider excavation without having had an assessment of the cost impact shows poor judgment by Fife Council's Education Service. Excavation has been mentioned as if it is easily done, without any costs what-so-ever being brought into context. Fife Council noted in their presentations on 27th October 2011 that the excavation costs for Station Park, a level playing field, would be £42 per cubic metre including cartage. How many thousands of cubic metres will need to be removed at the Pipeland site.

The StACC also objects to the disruption to the surrounding area and businesses, including the hospital, as well as the potential flooding risk to properties on Scooniehill Road during construction of the school.



7. Traffic Issues on Largo Road

The StACC objects to the traffic issues that will be created by the development of the school at Pipeland.

Fife Council's own transportation report notes that at present, the development of school would cause a 90 vehicle tailback for 15 minutes during the morning rush hour. The report also indicates that every junction on the A915 from the school/hospital junction at John Knox Road to the junction of City Road and North Street will be operating at over-capacity at times between 8am and 9am each school day. Although not stated by the report, 90 vehicles represent about 750 metres to 1Km tailback from the school. How far into St. Andrews will this traffic congestion extend?

The StACC finds it completely unacceptable to plan a school knowing these traffic issues, especially when the figures do not include any allowance for additional traffic that might be generated by the development of the old Abattoir Site, and by the creation of the Western Development of the town in a few years time.

The StACC strongly objects to the proposal to build the school at Pipeland Farm based on this Transportation report.

8. Proximity to mobile phone masts

The proposed site at Pipeland is only a short distance from the cluster of telecommunications masts (including a TETRA mast) on the Largo Road above Morrisons. The advisability of keeping children away from radiation of this type has been noted for many years. The Stewart Report in 2000 said, "There is evidence that at the frequencies used in mobile phone technology, children will absorb more energy per kilogram of body weight from an external electromagnetic field than adults... Additionally, since children are being exposed to RF [radio frequency] radiation from base stations (and from mobile phones) from a younger age than adults, they will have a longer time in which to accumulate exposure over the course of their lives, and a longer time for any delayed effects of exposure to develop." Rather than simply banning base stations from school grounds, the Report favoured requiring "that the beam of greatest RF intensity from a macrocell base station sited within the grounds of a school should not be permitted to fall on any part of the school grounds or buildings without agreement from the school and parents. Furthermore, when consent is sought from a school and parents about this question, they should be provided with adequate information to make an informed decision... We further suggest that similar considerations should apply in relation to a macrocell base station outside the grounds of a school



but at a distance from the edge of the grounds comparable to that of a macrocell base station were it to be placed within the school grounds.” Four years later the National Radiological Protection Board re-emphasised that “The Board believes that the main conclusions reached in the Stewart Report in 2000 still apply today and that a precautionary approach to the use of mobile phone technologies should continue to be adopted.”

The StACC notes that current Scottish planning policy is scandalously weak with respect to the health risks of mobile phone technology, being little more than an operators’ charter. There are, however, dissenting expert voices.

“Mobile phone masts should be banned from within a mile of all schools, nurseries and residential areas to protect children’s health, it was warned last night. Neurophysiologist Dr Keith Baxendale fears the masts are exposing thousands of youngsters to potentially dangerous levels of radiation. Dr Baxendale claims the situation is now so serious that immediate action should be taken to stop masts going up in places where children congregate. The scientist wants a ban in Scotland, following the lead of New Zealand, Sweden, Italy, Australia and parts of the U.S. in banning them from such areas.” (Mail Online, 21 February 2012).

The StACC contends at that, if it is foolish to allow the erection of phone masts near schools, it is equally clear that it is foolish to build schools close to masts.

9. Flooding on Scooniehill Road, Largo Road and Kinnessburn

The StACC objects to the proposed Sustainable Drainage System (SUDS) proposed in the Planning Application. It is a very complex and extensive network of pipes that includes diverting a sewer and building an underground storage tank. When built on a field that is already susceptible to flooding, the radical earthworks and quarrying required to accommodate the school and sports pitches on a sloping site will increase the flooding risk. The restricted space available for storage of surface run-off requires the installation of a below ground storage tank. Failure of this system would increase the flooding risk for houses in Scooniehill Road and potentially, Largo Road.

The additional proposal to install a discharging system into the Kinnessburn at the bottom of Pipeland Road is also objected to. With New Park, and St. Leonards developments also discharging into the Kinnessburn, it is almost guaranteed that Kinnessburn Road will be flooded at regular intervals.

The StACC objects to the drainage system proposed.



10. Pipeland Farm is North Facing and near the top of the Southern Hillside

The StACC objects to the positioning of the school on what is a northerly position which will effectively have the cold winds coming in from the north, the west and the east, with the majority of the school facing north, this is not congenial to a good environment for learning. By digging the building into the southern hillside, the building will receive minimal sunlight, especially during the winter months. This will necessitate extra heating and lighting being used, which will incur higher running costs, and which is neither environmentally friendly or good for our carbon footprint.

11. Light Pollution and impact on neighbouring properties

The StACC also objects to the potential light pollution for the proposed new Madras College as it sits on a highly visible location. There is a potential for light pollution, particularly from school playing pitches, if these are supplied with flood-lighting and used after school in the winter time. There will be an impact upon local residents and the hospital.

12. Cost of sports facilities - lack of swimming pool

The proposal for a new Madras College will, in the view of the StACC, have a significant deficit in the sporting facilities currently available at Kilrymont. The funding available makes no allowance for a swimming pool, which has been a valuable and well used resource at Kilrymont. Where will pupils be taught the basics of swimming? The East Sands Leisure Centre could not absorb the needs of Madras College pupils and transport would be required to bus pupils to that facility for what limited access it could offer.

13. Impact on Neighbouring Hospital - particularly the Hospice

The StACC is concerned about the impact of the development and the operation of a school on the neighbouring hospital. By building at Pipeland it is going to be detrimental to the hospital inpatients, especially those who will be directly facing the school - that is those at the hospice. Those whose end of life should be one of peace and dignity and at the very least quiet. As a community it is hardly befitting not to show compassion to those who should be allowed to die in peaceful, tranquil surroundings. Building a school next to the hospital will be extremely detrimental to those we should be caring most about at a specific time of life when the sanctity of well-being should be tantamount to the terminally ill patient.



14. Bussing costs and time - Greenhouse gas issues. Climate Change Scotland Act 2010

As noted in section 1 above, this proposal does nothing to reduce the number of children being bussed from Newport, Tayport and the Tay Bridgehead. The number of busses will be the same, and the distances travelled by the older children coming from these areas will increase. As noted above with regard to the positioning of the school on a North facing hillside, the gas and electricity usage of this school will increase rather than decrease with a modern school in a better location.

The StACC understands that children from the Tay Bridgehead will spend up to 50 hours per school year more on a bus as a result of placing the school at Pipeland Farm. The increased cost of all these busses driving through a 90 vehicle traffic jam will lead to increased journey times and increased Greenhouse Gas emissions

The StACC strongly objects to a proposal from Fife Council that does nothing to address the challenges of the Climate Change Scotland Act 2010, nor implement anything toward the Local Plan Policies that direct this.

15. Lack of Educational Benefits

Finally, as noted by some of the members on the StACC, people have suggested that their children will learn better in a new school building. This is not proven. Kilrymont was new, less than fifty years ago. With new methods of communication, who can say what will be needed in fifty years. It has also been suggested that the Pipeland site will help to deliver the new curriculum. Conversations with current teachers have indicated that this not the case in a school such as Dundee High School.

While the StACC appreciate that there should be financial benefits of having the school on a single-site, and that there will be less travel between the sites for staff, the StACC can find no other exceptional benefits of positioning the school on Pipeland Farm.

The Pipeland Farm site has no obvious advantages. It has many disadvantages as noted above, that can be removed by the selection of a different site within the Royal Burgh.

For all of the above reasons, the StACC requests that this Environmental Impact Assessment/Planning Permission in Principle application be rejected in its' entirety.



Please can you acknowledge safe receipt of this letter,

Yours sincerely,

Howard Greenwell
Convener - Planning Committee
St. Andrews Community Council

cc: St. Andrews Community Council Planning Committee
Cllr. Frances Melville
Cllr. Dorothea Morrison
Cllr. Keith McCartney
Cllr. Brian Thomson