

Dear Sir,

15/01283/EIA – CRAIGTOUN NORTH.

On behalf of the Royal Burgh of St. Andrews Community Council (STACC) Planning Committee, I wish to lodge an OBJECTION to this application.

The proposal consists of up to 350 dwellings (including 30% affordable), a Community Hub area, including commercial, employment and community linked uses, a food store, small workshops and offices, a community health centre, a linked distributor road, plus local roads serving new local neighbourhoods, a pub/restaurant, a budget hotel, etc.

The STACC Planning Committee's main reasons for objecting (which may be followed by further detailed objections) are:

- 1) The development is significantly contrary to the Adopted St. Andrews and East Fife Local Plan (2012).
- 2) Approval of the application would predetermine the forthcoming examination and decisions on the FifePlan.
- 3) The Examination by Scottish Reporters of the Local Plan (2012) referred (at p.463) to Class 5 (general industrial) and Class 6 (storage and distribution) traffic using Craigtoun Road , and stated:

'I am also concerned about the heavy traffic . . . using Craigtoun Road. Although this is an arterial road into the town, there are many residential properties fronting it, all of which would suffer a diminution in their amenity from large volumes of industrial traffic, much of which could be heavy goods vehicles.'

It seems likely, in the absence of the required St. Andrews West Link Road from the A 91 to Craigtoun, that the majority of the construction traffic and subsequent additional traffic from the development would come through the town and along Hepburn Gardens – alternative routes are unlikely to be able to cope.

There is no adequate assessment of the potential traffic impact on St. Andrews .

- 4) Part of the development site includes development of land allocated as 'Green Space' in the 2012 St. Andrews West Development Framework. This area is designated in the Alison Grant Landscape Capacity Assessment and Proposed Green Belt Study of St. Andrews (commissioned by Fife Council and published in 2003) as 'Category 5', where:

'development is inappropriate because of its potential impact on the landscape character, scenic quality or visual attributes of St. Andrews and its setting.'

- 5) Some FifePlan representations (including one from Headon Developments) say that approving Craigtoun North would undermine the viability of the remaining part of St. Andrews West, and prejudice the outcomes sought by Fife Council.
- 6) Approval of this application would also undermine Scottish Planning Policy's core value that planning should be development plan led. It means that any grant of planning permission would have been achieved through planning by application/appeal, as opposed to development planning. It would prejudice decisions about the scale, location and phasing of new developments in St. Andrews West.
- 7) A fundamental element of the 2012 Adopted Local Plan is a Masterplan for St. Andrews West, approved by Fife Council. There is no such Masterplan. The Local Plan also requires community involvement in the preparation of the Masterplan, with '*ample opportunity for the local community and their representatives to influence the size and type of new community facilities*'. Pre-application consultations are not a substitute for Local Plan requirements.

In April 2014 a Council official said that:

'In the case of St. Andrews West . . . there will be an onus on the developers to agree in advance with Community Councils and other representative groups what the scope and format of the engagement in, and the public consultation on, the masterplanning process.' This has not happened.

- 8) The Local Plan also requires a Flood Risk Assessment.
- 9) The Local Plan states that the Masterplan will also set the route of the proposed link road between the A 91 and Craigtoun Road , detail developer contributions, allocate responsibility for funding across St. Andrews West, and be subject to approval by Fife Council.
- 10) Affordable housing – Phase 1 proposes 80 affordable units, and Phase 20 affordable units and 78 market housing units. The development in Abbey Walk was also supposed to have 30% affordable housing, but currently has 29 out of a total of nearly 500 units. Student housing and 'special needs' housing are among those which Fife Council says do not need an element of affordable housing. How many affordable housing units would actually be built at Craigtoun North?
- 11) A gas pipeline and a high voltage overhead powerline run across the site, which will presumably have to be relocated.
- 12) It might be considered that one way of addressing impacts on the development of St. Andrews West, excluding Craigtoun North, would be to increase housing numbers beyond 740 units on the remaining 99ha. This would be extremely controversial and

would be unacceptable to the St. Andrews community. Development plans are meant to offer some certainty to residents, and this would be a fundamental breach of trust.

13) The 2009 Local Plan Action Programme stated:

‘The Link Road between Craigtoun Road and Strathkinness Low Road to be completed prior to the operation of commercial development at Craigtoun Road.’

14) Advance planting of tree belts and structural landscaping, to screen development, should be considered.

15) Lastly, does St. Andrews need this large extension into the countryside, or will it only be of benefit to the developers?

Yours faithfully,
(Miss) P. M. Uprichard
For the STACC Planning Committee