



Royal Burgh of St. Andrews Community Council

REF. EFLP2a,
Fife Council,
FREEPOST RRKT-TTSR-KBYU,
Development Services,
Town House,
2 Wemyssfield,
KIRKCALDY,
Fife KY1 1XW

10, Windsor Gardens
St Andrews
KY16 8XL

7 January 2010

Dear Sir/Madam,

Finalised St Andrews and East Fife Local Plan 2009

I Overview

Disregard for local opinion

1. The Community Council is fundamentally opposed to the concepts on which the Local Plan (LP) proposals for the town are based. They arise not from any synthesis of the aspirations and desires of local residents but are constructed with the primary aim of serving the interests of Fife Council and the University as institutions. During the protracted Structure Plan (SP) saga, no one could be in any doubt about the opposition of local people to the proposed policies for the town. The dogmatic manner in which objections were repeatedly brushed aside suggested that the financial benefits for the institutions of securing their desired Structure Plan framework must be indeed be substantial. The present Local Plan proposals are but a continuation of the same process, designed to achieve the goals that have been present throughout. The Community Council's support in principle for Penny Uprichard's legal challenge to the Structure Plan is due in no small part to our abhorrence at the cavalier disregard for local opinion. Nevertheless, whilst this Local Plan consultation is arguably premature until the result of that challenge is known, this submission has to assume for the moment, in the absence of any alternative foundation, that the Structure Plan will stand in its present form.

The University/Headon Western Development is not the only possible answer

2. The Structure Plan effectively sets the questions that the Local Plan must answer. Throughout the Structure Plan process, it was evident that Fife Council was attempting to ensure that, in St Andrews, the only feasible answer to the Structure Plan questions would be the so-called Western Development, first proposed by the University and Headon Developments in 2002. Now that we have reached the Local Plan stage, the possible answers are by no means unique and include ones which will be seen as much more palatable by the people of this town.

St Andrews West can be in the Kinness Valley

3. Despite Community Council representations to the contrary, the location of the St Andrews West Strategic Land Allocation was given no clearer definition in the Structure Plan than that inherent in the name. The Community Council objects strongly to the definition of St Andrews West in the Local Plan, believing that the requirements of the Structure Plan can be satisfied in a manner that causes much less damage to the environmental setting of the town. We have argued for many years that limited development to meet local need should be located on the relatively low-lying ground of the Kinness valley. This contour-based approach has commanded widespread support in the local community for at least the last 15 years. Indeed people can legitimately feel aggrieved at the number of times they have made representations to this effect. We deplore the cynical attitude of those organisations that hope that consultation fatigue will result in this message coming across less powerfully on the present occasion.

Little, if any, greenfield development is necessary

4. In fact, only quite limited development, if any, is necessary on greenfield land in the Local Plan period to 2018, though more will be needed in the following Local Plan period in order to meet the requirements of the Structure Plan. The Community Council is fully supportive of the Structure Plan requirement to maximise the use of brownfield land, and at the present time there is more such land in St Andrews available for housing than there has ever been. Feasible sites include the former New Park School and the already extensive former school ground at St Leonards Fields, now augmented by the addition of former Memorial Hospital land. Redevelopment is also proposed of a large site at the East Sands.

Use of Langlands B would further undermine the case for the Western development

5. Some of us on the Community Council believe that the primary reasons behind the preference of the University and of Fife Council officials for the Langlands B site for a new Madras College are not educational, as is claimed, but rather to serve as a Trojan horse for the Western Development. It is ironic that the abandonment of the Kilrymont site for educational purposes would create another huge injection of brownfield land that could be used for housing, rendering all the more unnecessary the large-scale use of greenfield land in the Local Plan period to 2018.

Misleading the public

6. We are also saddened by the ruthless manner in which Fife Council is pursuing its goals. Far from offering the public a balanced presentation of the facts, the arguments and even the data appear to be manipulated to push people into believing that their own desired conclusions are the only ones possible. The amount of brownfield land available for housing, for instance, seems to be under-stated to make the large-scale use of greenfield sites look inevitable. The whole concept of a Green Belt is subverted if, effectively, the favoured developers are given first choice of the areas they fancy and the Green Belt is formed from the left-overs. We object also to the use of language designed to bully the public or make them believe they are looking at a “done deal” on which expression of an opinion would be pointless. Para. 13 of the LP says “Development at North Haugh/Langlands, and at land at Craigtoun Road, make up the St Andrews West Strategic Land Allocation”, giving the incorrect impression that this was determined by the Structure Plan and is not a new proposal. Moreover the St Andrews West Development Framework says that “A single carriageway road and associated infrastructure including landscaping will link the A91 to Craigtoun Road”, whereas the Structure Plan seems merely to refer to an undefined link road in St Andrews.

Lack of clarity

7. The LP is not a masterpiece of clarity. There is, for instance, no clear statement of the total number of housing units for which the LP seeks to provide sites. Column E in the second table in LP para. 54 appears at first sight to give the number of units to be found through the LP, but footnote E implies that further units have been added to ensure a five-year land supply. Readers should be able to obtain the target number of housing units without having to construct their own spreadsheet settlement by settlement. This task is indeed bedevilled by the way in which sites that form part of the existing housing land supply are mixed up with those that are proposed LP allocations.

Misinformation

8. The water has been further muddied by misinformation given to the public. At the public exhibition of the proposals of the University/Headon partnership, the proposed secondary school was shown on a low-level site at the western end of the North Haugh, even though it was well-known at the time that this was no longer the site that the University was offering to Fife Council.

II Housing

Apportioning the additional strategic supply

9. The additional strategic supply (SP para. 3.48) required an additional 270 units in the St Andrews and N.E.Fife Housing Market Area (HMA), with the footnote to Proposal PH3 indicating that up to 180 of these would be in the Tay bridgehead area. SP para. 3.48 explained that these additional units were being allocated at the level of the HMA as the additional supply had not been subject to the Strategic Environmental Assessment (SEA) process. Comparison of the table in LP para. 54 with SP proposal PH2 shows that exactly 180 units have been allocated to the Tayport/Newport/Wormit Strategic Land Allocation (SLA) and all the remaining 90 to St Andrews West. We see no justification for this. We would argue that, as the main strategic allocation apportioned 1000 units to St Andrews West and 500 to the East Neuk settlements SLA, at most two-thirds (i.e. 60) of these 90 units should be allocated to St Andrews West. Indeed, were a more incisive SEA to be carried out, there might well be good reasons for the fraction to be smaller than this.

Required number of strategic units in the Plan period

10. The Strategic Land Allocation in the LP (column D of the second table in LP para. 54) is obtained by taking the augmented Strategic Land Allocation of the SP (combining Proposals PH2 and PH3) for the period 2006-16 and adding 40% of that for 2016-21. We argued in the previous paragraph that the total allocation until 2026 for St Andrews West should be 1060. Applying the same phasing approach to that allocation implies that the strategic allocation for St Andrews West to the end of the LP period in 2018 should be 570, as indicated in the following table:-

Phased development of Strategic Land in St Andrews 2006-18

	2006-11	2011-16	40% of 2016-21 (rounded)	Total
Allocations from SP Proposal PH2	50	350	140	540
Proposed allocations from SP Proposal PH3	0	20	10	30
Total allocation	50	370	150	570

Ensuring a five-year land supply

11. As we noted above, footnote E to the second table in LP para. 54 implies that further units have been added to ensure a five-year land supply. We can see no case for such an adjustment, which would be yet another point at which the figures are rounded upwards for the benefit of developers. For instance, the calculated housing land requirement routinely includes a 10% flexibility allowance. SP Policy objectives (following para. 3.40) include “Ensuring a minimum 5-year effective supply of new housing land is available at all times in each of the Housing Market Areas to meet the Structure Plan requirement.” As the Structure Plan was accepted by the Scottish Government, it must be assumed that the Government regarded the allocation of housing land within the SP, and the phasing of that allocation, as adequate to meet the SP’s objectives.

The strategic allocation more than meets the shortfall

12. Column E of the second table in LP para. 54 shows that, contrary to what we had previously understood, the allocation of strategic land in the St Andrews and N.E. Fife HMA (which it incorrectly labels as St Andrews and East Fife) within the LP period exceeds the shortfall by 135 units. In view of the recent successful appeal against refusal of planning consent by the applicants for the Grange Road site, we assume that this overshoot has now risen to 185 units. Structure Plan Proposal PH1 indicates a LP allocation of 930 units to the HMA within the period 2006-26, but in the LP period to 2018, the housing land requirement is satisfied without resort to this allocation. Accordingly SP requirements are met by allocating all 930 units in this category in the LP period commencing in 2018.

The brownfield requirement should take precedence

13. The LP has to resolve the apparently conflicting Structure Plan requirements (SP p.21) that the identification of housing land will maximise the use of brownfield sites and that a large proportion will lie within a SLA to the west of the town. These two requirements are incompatible within the LP period to 2018, but can be substantially satisfied by 2026. The priority should be to utilise the brownfield capacity, and our calculations (see next para.) suggest that, of the strategic allocation of 570 units within the LP period to 2018, 380 units should be on brownfield or infill land. The number of units assigned to the SLA to the west of the town would therefore be 190 units in the period to 2018, and the remaining 490 units specified under SP Proposals PH1 and PH3 in the period 2018-26.

Brownfield allocation

14. The brownfield or infill sites taken into account in the calculation in the previous para. are shown in the following table:-

Site	Capacity
169-173 South St	8
New Park School	30
St Leonards Fields/Memorial Hospital	245
East Sands	100
Total	383

15. This is a highly conservative estimate of available housing land within the town. We are surprised by the omission of the Priory Gardens site, which was shown with a capacity of 10 units in the 2006 Draft LP. We also assume that the NHS will wish to dispose of the former Health centre in Pipeland Road, which could provide another 10-15 units. Such possible contributions are minor when compared to those that would arise if the new Madras College were not located at the Kilrymont site. If that were to happen, this Community Council would certainly urge that the site should not be left derelict for years. The Kilrymont site could provide land for a further 200 housing units. If, before final decisions have been taken on this LP, that land were known to be available, it should, in the view of this Community Council, be used in preference to greenfield land to the west of the town, leaving the SP requirement on the use of land to the west to be satisfied by land allocations in the LP period commencing in 2018.

Greenfield allocation

16. If the Kilrymont site does not become available, this Community Council would support the use of a site with a capacity of 190 units in the Kinness valley, at the eastern end of the site called Craigtoun Road West (h80) in the 2005 Draft LP.

III St Andrews LP Proposals

STA 01 St Andrews West Strategic Land Allocation

17. The Community Council is broadly supportive of the following land use proposals, but recognises that there are aspects of detail which it may well wish to raise at the appropriate time.

(a) The proposed housing in the Kinness Valley

18. We set out above the widely held view that, of the possible greenfield sites around the town, those in the Kinness Valley are able to provide for necessary development with the least damage to the environmental setting of the town. Nevertheless we will have ongoing concerns about the proportion and permanence of affordable housing, the mix of house sizes, house designs, etc.

(b) The proposed site for community facilities off the Craigtoun Rd

19. In particular, this Community Council has long argued for a neighbourhood shop in the vicinity of the Craigtoun Rd.

(c) The section of the proposed link road between Melville Rd and the Strathkinness Low Rd

20. Construction of this portion would mean that Lawhead Roads East and West would no longer effectively serve as the link between the Craigtoun Rd and the Strathkinness Low Rd, a purpose for which they were not designed.

Park-and-ride site

21. The Community Council has been supportive of park-and-ride services, but is realistic enough to appreciate that in a town the size of St Andrews the extent of local patronage will be limited. We objected to the proposed park-and-ride site in the 2005 Draft Plan because of its interaction with the rail link, and we would continue to oppose any proposal that failed to make provision for a rail link (See paras. 58-61.) or caused any major increase in its cost. We would also be seeking binding guarantees that any site constructed would indeed be used for a specified minimum number of years.

- 22. The Community Council does object, however, to many facets of the St Andrews West Development Framework as set out in the Local Plan. Specifically **we object to:-**

(i) The proposed housing between the Strathkinness High and Low Roads

23. This is a highly visible site positioned on some of the highest ground to the west of the town. Development here would be visible from miles around, and is, in our view, completely unacceptable.

(ii) The proposed housing to the north of the Strathkinness High Rd in the vicinity of Northbank

24. We regard this as an entirely unsuitable site for development of any kind. Development here would be very damaging to the iconic view of the town from the west – a view that has been valued for centuries by residents and visitors alike.

(iii) Provision of a site for a hotel

25. Many of the ideas in the Local Plan are based on ill-conceived pipe-dreams rather than any substantive economic case. The proliferation of proposed hotel sites in or near St Andrews is one such. We have in recent years seen various ill-judged commercial ventures by those who believe that just locating in St Andrews provides a licence to print money. Fife Council should not be backing such schemes: if they achieve anything it is likely to be to the detriment of those currently employed in the hotel business. SP Policy E1 requires Local Plans to identify sites for hotels throughout Fife, and provides no backing for a concentration on St Andrews. If a site in St Andrews is required to meet this policy, it should be in the Kinness Valley.

(iv) The portion of the proposed link road between the Strathkinness Low Rd and the A91

26. Although the Structure Plan makes provision for a link road, it defines neither its location, nor its extent nor its purpose. Adoption of the part between Melville Rd and the Strathkinness Low Rd would therefore not only assist the development of the Kinness valley, but also satisfy the Structure Plan requirements. Our remarks under (i) and (ii) above about the environmental damage that development would cause in this area imply that we cannot support the road that would facilitate that development. The need for such a road has not been established, and it is well-established that new road capacity generates new traffic growth, contradicting the governmental aim of reducing carbon emissions. Such a road would also cross the route along the southern side of the A91 that was proposed in 1999 by the Fife and South Tayside (FAST) Rail Study for a rail link to St Andrews, and would add to the cost of construction of that link.

(v) The procedure for selecting a site for a new secondary school and the arrangements shown on the Development Framework Map

27. We understand that Fife Council's currently preferred site in this area does not conform to the boundaries indicated on this map. This in itself is highly unsatisfactory, as the public response data is thereby rendered unreliable. A highly detailed inspection of responses may reveal in some cases whether the respondent is commenting on the Langlands B site, the site as indicated in the LP or the site as advertised at the University/Headon exhibition, but clearly there will be many instances for which this cannot be determined.
28. The skeletal proposal in the LP does not look to be well thought through. The arrows emanating from the site, purporting to indicate pedestrian links to the town, are but window-dressing. If the most northerly is intended to imply going via the North Haugh, the unnecessary descent then ascent is unlikely to appeal. The most southerly heads rather circuitously for Buchanan Gardens, where pupils would exacerbate the existing problems of students overflowing from the footpath into the road. The third, heading for the running track, is unlikely to please the university.
29. The Community Council regrets the apparent willingness of Fife Council and the University, in promoting their own interests, to create divisions amongst the citizens of this town on the question of the school site. The long-standing opposition of hundreds of people to the development of the Langlands area can have been no secret to either organisation. Despite, we are told, an original list of a dozen possible sites, opinion has been manipulated by offering a choice of just two sites, with the other choice being one to which objections from the parents of prospective pupils could be confidently predicted. Parents are obviously going to object when told that their children's education is liable to be disrupted for years or that the buildings at Kilrymont have asbestos problems.
30. Many in St Andrews will agree with the HMIE inspection report that the need for teachers to travel frequently during the working day between the Kilrymont and South St buildings is not satisfactory, and that a better solution is required. Nevertheless the Community Council has stressed the need to get the long-term decisions right, and has therefore been critical of the inappropriate haste with which Fife Council discarded the possibility of a Tay Bridgehead School.
31. St Andrews has been bedevilled under Fife Council by piecemeal planning decisions, with major developments, such as the Community Hospital and Kingask, being decided on an ad hoc basis rather than as part of a coherent strategy in the Local Plan. We now understand that Fife Council is considering promoting a planning application for the new Madras College prior to the adoption of the LP. If this is so, the Community Council will consider the application once it has been lodged, and has no intention of pre-judging it at this point. Nevertheless, many will see an application independent of the LP as unfortunate. For there can be no pretence in a town as small as St Andrews that there will not be knock-on effects that impact, to varying degrees, on the lives of all the residents. Indeed traffic engineers in the past have had to learn the hard way that our constrained road network can be severely disrupted by seemingly minor changes to road layout or travel patterns.
32. Assurances have been given that the Langlands B site is being favoured for purely educational reasons rather than to serve as a bridgehead for the Western Development. The truth, or otherwise, of this assertion may well be evident from any planning application, particularly if it is used as an excuse to promote the section of the proposed link road described under (iv) above. Such a move would breach the assurances given as recently as the start of this consultation exercise. Indeed the introduction to Proposal STA01 says that the route of the proposed road link will be set by "the masterplan". It is evident that the proposed masterplan will, as its name implies, be a very comprehensive document covering site layout, and such aspects as developer contributions, commitments to climate change and low carbon

technology, and water and drainage networks. We are also assured that the local community will be involved in the preparation of the masterplan.

(vi) **The proposed site for the science park**

33. SP requires the selection of a site for a 10 ha. science park. We object to the choice of Langlands for this site. We propose that it be located in the Kinness Valley. Possibilities there include either the 10 ha. business site e11 of the 2005 Draft Plan or part of the 10.68 ha. site labelled h79 in that plan. If the latter were used, the implication of our recommendation in para. 36 below is that a further 3.23 ha. of business land would be needed for our proposals to satisfy SP requirements. This could readily be accommodated elsewhere in the Kinness Valley.

STA 03 Grange Road

34. We are aware that the applicants for this site have recently successfully appealed against refusal of planning consent. Nevertheless, to cover any possible technicalities of which we are unaware, we record again our objection to the use of this site for housing. We are also strongly opposed to the proposed requirement that, "The layout of the development should safeguard routes through to Kilrymont Crescent and to the west of the site." We certainly do not wish this site to be used as a springboard for the development of still more of the southern hillside. Our understanding is that the Local Members of Fife Council have also expressed their opposition not only to the planning application for this site, but also to more general development of the southern hillside. It is, to say the least, disappointing that unelected officials feel no obligation to heed the wishes of the elected councillors.

STA 04 Bassaguard

35. Community Council welcomes the continuing use of this site for appropriate employment purposes.

STA 05 Pipelands

36. We object strongly to the proposed development of any part of the southern hillside of the town, whether it be for business or industrial use, as proposed here, or for housing. We wish to see this site included within the Green Belt for the town, rather than designated as a 2.7 ha. employment site. We propose instead the retention of the designation of the 6.77 ha. OPP5 Strathtyrum high amenity business site in the present (1996) LP.

STA 06 Largo Road

37. The Community Council supports the development of this site, provided that it is used for appropriate commercial or light industrial purposes. The amount of suitable land available for employment purposes is limited: housing should not be permitted on it.

STA 07 New Park School

38. We support the development of this site for housing. We note that the indicated capacity of 30 units corresponds to only 20 to the hectare, a density that the Council would ordinarily discourage under SP Policy H6 which seeks a density of at least 25 units per hectare in most circumstances. In the context of Hepburn Gardens, we would not oppose the use of the site for only 30 units, but would object to any lower figure, particularly one designed to circumvent the need for on-site provision of affordable housing.

STA 08 St Leonards Fields and Memorial Hospital site

39. We support the use of this site for housing, but object to the proposals that parts of this site be used for a hotel or for a Class 4 office development of 1000 square metres. We do not believe that St Andrews needs or desires either of these proposals. Further hotel developments are likely to endanger the jobs of the staff in the existing hotels. The Community Council wishes to see this site used solely for housing, and, given its proximity to the town centre, we wish to the percentage of affordable (in perpetuity) housing maximised. We note that in the 2005

Draft LP, the St Leonards site (h78) had an area of 5.08 hectares, and 180 units were expected on the site. Since then the site has been augmented by the addition of the Memorial Hospital site and its area has increased to 6.9 hectares. SP Policy H6 says that “Higher densities are encouraged particularly within or in close vicinity to town centres and/or public transport interchanges/corridors”. We would therefore propose 245 units for this site, corresponding to density of approximately 35 to the hectare. Development must nevertheless be of a design compatible with this important part of the Conservation Area, and should be understated rather than loud. We would therefore call for the deletion of the clause “Public art, building design and orientation to announce key areas or frontages.” Public access along the burn must be retained.

STA 09 East Sands/ Harbour Improvement Area/ Gasometer site

40. In practice, it seems highly probable that part of this large 13 hectare site will be used for housing. We would propose that 4 hectares be explicitly designated for housing that will contribute to the housing land supply. Bearing in mind that the excessive height of the new Gatty was not well-received, design requirements should specify the maximum acceptable height. We would also support the provision of student accommodation on this site, but would wish to see the proposed “potential visitor destinations” explicitly constrained to those compatible with the residential and university research and teaching uses proposed for other parts of the site. We are opposed to any development of the East Bents.

STA 10 West Sands

41. The Community Council would support the provision of better refreshment and toilet facilities on the southern section of the West Sands, but wishes to see the northern part of it maintained in a natural state rather than being subject to creeping urbanisation. We would reserve our position on Proposal STA 10 until it is better defined. Some “improvements” in recent years, such as restricting the access points for cars heading for parking spaces, have had a detrimental effect. It is important that proposals are well-thought out and subject to wide public consultation before they are implemented.

STA 11 Market Street and surrounding area

42. For many years, the Community Council has noted the attractions of increasing the space reserved for pedestrians, but recognised that the vitality of the town centre requires alternative parking provision for the spaces lost, at least until viable alternative suitable modes of transport are available for all, including the many elderly residents of the town. A detailed objection to the proposals for Market Street has already been submitted.

STA 12 Fleming Place, Kinnessburn and Park Street

43. The Community Council welcomes the proposed extension of the conservation area to cover this area.

LW4 15 Craigtoun Park

44. The Community Council has been unimpressed by Fife Council’s management of Craigtoun Park. In particular, agreeing to play second fiddle to the Duke’s Course on advertising signs and moving the entrance to the far side of the park from St Andrews have not been moves designed to increase usage of the park. We would oppose any move to solve these problems by selling off parts of the family silver. In particular, we object to proposed hotel development at Craigtoun Park. Commercial developments should not be considered before better advertising and management of the Park have been put in place, and should be on the basis that any new buildings or facilities constructed revert to Fife Council at the end of a lease of 25 years, say.

LW4 20 Cemetery Extension

45. The Community Council supports the principle of a cemetery extension, and is unclear why this proposal has been given an LW rather than an STA label. We indicated our support in

2005 for the proposed use of the site to the south of the existing cemetery, and would continue to support the use of the upper part of that site. We understand that the lower part is no longer deemed suitable, and would propose instead the use of the eastern portion of the site labelled h81 in the 2005 Draft LP.

LW4 24 Green Belt

Inner boundary

46. We object to some sections of the proposed boundaries for the Green Belt. We are able to welcome much of the proposed alignment of the inner boundary on the southern side of the town, but wish site STA 05 Pipelands to be included in the Green Belt (see para. 36). We wish the northern part of the inner boundary to be amended to include Station Park (the Madras School playing fields) in the Green Belt. To the west, we wish to see relaxation of the proposed inner boundary in the Kinness Valley, in view of the widely held belief that the necessary development that the town requires will cause less environmental damage in this area than on other parts of the periphery of the town. We wish the area covered by the sites h79 and h80 of the 2005 Draft LP to be left inside the inner boundary. On the other hand we strongly believe that the land between the Strathkinness High and Low Roads should be included in the Green Belt as it is high ground that is very visible from miles around.
47. To the north-west, we seek a tighter inner boundary than that which is proposed. The boundary should be drawn tightly around the west and north sides of the houses on the Strathkinness High Road, and along the boundary of the Fife Park and David Russell Apartments sites. It should then follow the path to Andrew Melville Hall to the top of the raised beach, following that until joining the line of the town envelope of the 1996 LP to the A91. We do not seek to use this proposed boundary to pre-judge any planning application for the Langlands B site, but, noting that SPP 21 requires Green Belt boundaries to be well-defined, a boundary involving the Langlands B site could not in any case sensibly be proposed before a precise definition of that site reaches the public domain. We note that our proposed boundary in this area is tighter in the Langlands area than that of Alison Grant, but less tight than the one proposed by David Tyldesley.

Outer boundary

48. An important part of the landscape setting of St Andrews is the coast as it stretches East South East away from the town and towards Boarhills. This coast is an important part of the view of the town from the West Sands. Heading eastwards along the southern section of the outer boundary of the Green Belt, at the point at which it hits the A917 Crail Road, we wish to see the boundary follow that road to Boarhills before following the Kenly Water or other well-defined boundary to the sea. It would be appropriate to heed the views of the people of Boarhills about the location of the boundary in the immediate vicinity of their village, perhaps omitting the village envelope as proposed in the LP.

TABLE 1 : SUMMARY OF RESPONSES TO ST ANDREWS PROPOSALS

	Site	CC response
STA01	St Andrews West	Object (See paras. 23 to 33.)
STA03	Grange Road	Applicants have appealed successfully, but CC remains opposed to any development of the southern hillside.
STA04	Bassaguard	CC supports
STA05	Pipelands	Object – loss of southern hillside
STA06	Largo Road	Support employment use, object to housing
STA07	New Park School	Support housing, wish to see affordable included
STA08	St Leonards Fields/ Memorial Hospital	Object to hotel & office development. Want whole site used for housing, preferably affordable.
STA09	East Sands/Harbour	Want 4 hectares explicitly for housing, also student accommodation.

TABLE 1 CONTINUED

STA10	West Sands	Support the principle of improvements, but await information about the details.
STA11	Market St & surrounding area	An objection to aspects of these proposals has already been submitted.
STA12	Fleming Pl, Kinnessburn, Park St	Support extension of Conservation Area
LW4 15	Craigtoun Park	Object to hotel development. Commercial development should be a last resort after better management, and should not involve sale of land.
LW4 20	Cemetery Extension	Support an extension on contiguous land to the south of the Strathkinness High Road.
LW4 24	Green Belt	Object to some sections of the proposed inner and outer boundaries.

IV Local Plan Policies

H2 Affordable and Special Needs Housing

49. The two or three years since this policy was announced have seen no diminution in the desire of builders to develop in St Andrews and the surrounding area. This shows that proportion of affordable housing that the market can sustain is clearly larger than the proposed figure of 30%. We would therefore propose that, in the St Andrews and N.E.Fife HMA, it should be required that 50% of housing is affordable except in cases where the applicant can demonstrate that the housing will remain affordable in perpetuity when the 30% limit will apply.
50. We also propose that onsite provision of affordable housing should be required on all sites of 10 or more units. Some measure is also needed to prevent developers sub-dividing sites to circumvent the onsite requirement. We wish the policy permitting affordable housing to exceed the housing land requirement to be amended, referring in the second line to “the proposed houses” rather than “they”. We also wish clause (a) to require that these houses continue *indefinitely* to be available to cater for local need. We are unclear why required proportions of affordable housing for Dunfermline and West Fife or for Kirkcaldy, Glenrothes and Central Fife are being specified in a LP for St Andrews and East Fife.

E17 Green Belt

51. We strongly support the concept of the Green Belt, but object to Proposal E17 and the approach which it exemplifies. The SP says that “Green Belt will be identified and objectives secured for both Dunfermline and St Andrews.” The proposed policy E17 does nothing to secure objectives for the Green Belt, and merely provides some partial exemptions from SP requirements. There appears to be a fundamental dishonesty about the policy. It is designed to permit new buildings at a range of locations, and, unless words are to completely to lose their meaning, we can see no prospect of satisfying the clause that such buildings must “result in an overall enhancement to the landscape and environmental quality of the green belt”. In view of the other uses of the expression “development envelope” in this LP, the final clause could more usefully refer to “the existing footprint of the building.”
52. Our preference, however, is to have a completely new Green Belt policy that is more supportive of the concept of Green Belt. We believe that, with a well-designed policy, there should be no need for specific exemptions. The one in the December 2009 Edinburgh City Local Plan (proposed for adoption) provides a more realistic template. It reads:-
 “Within the Green Belt as shown on the Proposals Map development will only be permitted:
 a) where necessary for the purposes of agriculture, woodland and forestry, horticulture or for a countryside recreational use compatible with an agricultural or natural setting, and provided also that any necessary buildings, structures or hard standing areas are ancillary to the main

- use, small scale and of high design quality;
- b) where the proposal is for the change of use or small scale extension of an existing building, particularly a building of architectural or historic merit, provided that any proposed extension or ancillary development would not be detrimental to the character or appearance of the Green Belt;
 - c) where related to an existing non-conforming use or building in the Green Belt and provided the proposal is appropriate in type, scale and design to the existing building and not detrimental to the character or appearance of the Green Belt.”

Some modification of this would be required in order to cohere with Policy ENV1 of the Fife SP, but clause (a) could be readily re-modelled to cover golf courses and Craigtoun Park and clause (b) to cover the Old Course Hotel.

E19 Special Landscape Areas

53. We do not believe that the assertion that “AGLVs have been reviewed . . . and replaced by Special Landscape Areas . . .” is a correct description of the present position. We certainly do not accept the statement that the review of local landscape designations “has enabled a more robust policy approach”. We regard the methodology on which the review was based as fundamentally unsound. The review bore all the hallmarks of the all too typical local government consultation in which the conclusions are written to the satisfaction of the client before the evidence is assembled. As a consequence, we object not only to the proposed Special Landscape Areas shown on the Proposals Map but also to the loss of the AGLV designation on the areas at present thus designated and to the general approach of basing a new designation on such a deplorably poor piece of work. The implication of the proposed designation that development of the high ground between the Strathkinness High and Low Roads is more acceptable than in the Kinness Valley will be regarded by most people as completely ridiculous. It is also at variance with the work of the earlier professional consultants.

T1 The Transport Network

54. We object to the unambitious nature of this policy, which fails to take on board the Scottish Government’s goal of a 42% reduction in carbon emissions by 2020. We propose the insertion of an additional clause requiring applicants for new developments to submit estimated carbon emissions for their proposals together with detailed justifications for those estimates. It would also be appropriate to indicate that the proposed location may be deemed inappropriate if the likely emissions are excessive.
55. We propose that clause (f) should read “provide at least as much secure and convenient cycle parking as is specified in Fife Transportation Development Guidelines;”. Additional problems are that secure cycle parking in these guidelines is an aim rather than a requirement, and that greater clarity is needed on what level of security is required. The Guidelines acknowledge, for instance, that, for medium to long-term parking, “Cycle lockers, cycle stores (compounds) or supervised areas within car parks are likely to be more appropriate than unsupervised Sheffield stands, as they provide increased security and storage facilities”. We would also ask that the next revision of these Guidelines raises the level of provision required to reflect the gravity of the climate change problem. For instance, in the St Andrews context, the requirement that student flats or halls of residence provide one cycle space per six staff or students may just about cover current demand, but allows for little or no increase in the use of this environmentally friendly form of transport. We note that the Mayor of London’s requirement is one space per two students.

I6 Telecommunications

56. We object to this proposal which we regard as out-of-date and fundamentally misguided. (It also appears to end with a conjunction!) The proposal appears to be built on the assumption that the environmental impact of telecommunications masts and related infrastructure is

restricted solely to the visual appearance of the equipment. In this instance, however, it is clear to us that health considerations are more important than appearance.

57. Attempts to “conceal or disguise” such equipment are ill-advised. We believe that masts should be obvious so that members of the public can take their own decisions on whether they wish to steer clear of them or not. House-buyers, in particular, should be able to take informed decisions on how close they wish to be to telecommunications masts, rather than finding out about their presence once decisions have been taken. Our stance is consistent with the desire of the European Parliament for more public information on such matters. The Parliament went much further in April 2009 in calling for member states “to make available to the public . . . maps showing exposure to high-voltage power lines, radio frequencies and microwaves, and especially those generated by telecommunications masts,”

58. The following table lists all the LP policies to which we wish to object or on which we wish to comment. For some policies, the table contains only a brief summary together with a reference to the relevant paragraph(s) of this submission.

TABLE 2 : RESPONSES TO LOCAL PLAN POLICIES

No.	Subject	CC response
D1	Developer Contributions	The principle sounds fine in abstract, but in practice means that the Council gains a financial interest in planning consent being granted.
D2	Local Employment Agreements	The wording looks weak. Why not “LEAs will be required for all major developments”?
R1	Retail Centres	What does the clause “within the network of centres” mean? Clause (ii)b should not be one of a range of alternatives for which consent would be forthcoming. It should be a separate final sentence specifying an additional requirement:- “If the premises are part of a group of shops, the loss should not affect”
R2	Convenience Retail outwith town centres	Object. This policy does nothing to assist reduction of carbon emissions. There is a need for small convenience stores within walking distance of residential areas rather than the only requirement being accessibility by public transport.
B3	Working From Home	The conjunction “and” is needed between all the clauses.
B5	Protecting Existing Employment/ Tourism/ Local Community Facilities	This policy appears to be completely mis-titled. There is a distinct possibility that new hotels in the St Andrews context will endanger existing jobs in the accommodation sector.
B6	Commercial Leisure Development	Change clause (c) to read “there is an identified demand for the facility, with the demand being sufficiently large to merit the scale of facility proposed”
H1	Development Plan Departures – housing Sites	We support the intention of this policy, but it needs to be strengthened to cover developers sub-dividing LP sites. Add a further sentence, “If an application is for a fraction of a Local Plan site, the proposed number of houses must lie within the same fraction of the bounds calculated on the whole site.”
H2	Affordable and Special Needs Housing	Object. We believe that the required proportion of houses that are to be affordable in St Andrews should be greater than 30%. (See paras. 49 & 50.)
H3	Houses in Multiple Occupation	We support this policy, but would prefer clause (d) to say the property was not <i>built</i> as affordable housing.

E2	Development within town and village envelopes	Object. Whilst we support the provision of affordable and special needs housing, we do not regard it as appropriate to remove from it any obligation to conform to Development Plan policies. Indeed the wording here appears to conflict with the more measured language in Policy H2.
E5	Housing Development and Open Space	The sentence “Provision of accessible and secure equipped play, sport and recreational facilities commensurate with the scale of development is also required” is open to a wide range of interpretations. We would wish to see a clearer indication of what is deemed commensurate. In the first para. of the “Reason”, we seek the deletion of the words “on greenfield sites”, as the policy itself applies to sites which may be technically classified as brownfield. We also seek the retention of the advice in Appendix G of the 1996 LP that “meaningful sizes of open space are to be provided and small inappropriate areas should be avoided”. We do not wish to have a hotch-potch collection of tiny patches that remain only because the developer cannot squeeze another house on to them.
E7	Conservation Areas	<p>We support this policy and particularly welcome the sections related to demolition. In the penultimate sentence, we seek the replacement of the phrase “Where it does not,” by “In all cases,”.</p> <p>Bearing in mind the wholesale felling of trees at Ledaig at the corner of Kennedy Gardens/ Donaldson Gardens prior to planning consent, we seek also to strengthen the sentence “Trees that are considered by the planning authority to have amenity value shall be preserved”. We propose “Within conservation areas, no trees shall be felled except with the prior permission of Fife Council.”</p> <p>The proposed policy also requires “the design, materials, scale and siting” of proposed developments to be appropriate. We note that the 1996 LP had a list of aspects “required to conform to the highest possible standards” that included “the form of boundary enclosures”. We would regard retention of explicit mention of this aspect as helpful. We have, for instance, had a recent application seeking high fencing in the town’s Conservation Area.</p>
E8	Listed Buildings	This attempt to cover both the building and its setting in a single sentence appears to offer the applicant the choice of preserving either “the building, or its setting, or any features of special architectural or historic interest which it possesses”. We would propose the use of Edinburgh City’s wording: -“Development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the appearance or character of the building, or to its setting. Proposals to alter or extend a listed building will be permitted where those alterations or extensions are justified, will not cause any unnecessary damage to historic structures or diminish its interest and where any additions are in keeping with other parts of the building.”
E10	Protection of orchards and riggs	We welcome this policy.

E13	Street Furniture	We would wish to see explicit mention of the need for road safety considerations in the location of street furniture. e.g. there is a utility company's box at the end of Wardlaw Gardens that impairs the view of oncoming traffic for those entering Hepburn Gardens.
E14	Public Art	Object. The developer, or whoever commissions the art, should be required to provide evidence that the local community is broadly content with the nature of the proposed art.
E15	Development in the countryside	Object. We are strongly opposed to clause (e) of this policy, which indicates support for development which "provides for small scale employment land adjacent to settlement boundaries, which contributes to the Council's employment land supply requirements". Policy E1 says town and village envelopes are intended to "prevent the unplanned outward expansion of settlements into the countryside. This clause provides a mechanism for undermining the goal of Policy E1. We object to the ambiguity of the clause which says that a condition for support is that the development "contributes to the need for any improved infrastructure". The first sentence of the policy was presumably intended to say "Development in the countryside will only be supported where it . . . "
E16	Housing development in the countryside	We object to the ambiguity of the clause that permits development for "affordable housing of modest, limited scale". We would wish to see scale defined by a maximum of ten units.
E17	Green Belt	We strongly support the concept of the Green Belt, but object to Proposal E17 and the approach which it exemplifies. We seek a new policy more supportive of the concept of Green Belt. (See paras. 51 & 52.)
E19	Special Landscape Areas	Object. (See para. 53.)
E25	Trees on Development Sites	We support this policy, and would welcome any appropriate sanction on those who attempt to circumvent it.
E27	The Coast	We support the intention here, but seek the inclusion of the word "and" at the ends of clauses (a), . . . (f).
C1	Community and Leisure Facilities	We wish clause (a) to read "they will satisfy an identified demand for the facility, and are proportionate in size to that demand; and"
C2	Sports Facilities within Settlements	We wish clause (a) to read "the proposed development is ancillary to the principal use of the site <i>at present</i> ;"
C3	Sports and Recreational Facilities in the Countryside	We support the intention here, but seek the inclusion of the word "and" at the ends of clauses (a), . . . (e).
C5	Public Open Space	We support the intention of this policy, but wish it to commence with the words "Development on public open space, or the change of use of public open space to private garden ground". We also seek the addition of a clause "(e) inconsistent treatment of open space adjacent to a row of terraced houses". The appearance of some open plan housing developments in St Andrews has been spoilt by selling off isolated patches of garden ground.
C7	School and Further Education Establishment Ground	The policy acknowledges that "School grounds make a significant contribution to the provision of recreational open space", and imply a loss of local amenity should an educational use for the site be abandoned. It would be appropriate to indicate what proportion of the site should be retained as recreational open space in the event of a change in the primary use of the site.

C8	Footways/Cycleways/ Bridleways	We support the policy, but wish to amend the second sentence to read “Where development affecting such routes is deemed appropriate, suitable re-routing must be provided before the development commences, <i>and</i> before the existing route is removed from use”.
T1	The Transport Network	Object. (See paras. 54 & 55.)
T2	Traffic Safety in New Development	We welcome the introduction of policy on this matter, but would seek the insertion of the words “to all properties” after “including footway provision”.
I1	Renewable Energy	We support this policy, but wish the word “and” to be inserted at the end of clause(a).
I2	Combined Heat and Power	Again the relationship between the clauses needs clarification.
I6	Telecommunications	Object. (See paras. 56 & 57.)

V Major omission from the proposed Local Plan

Rail link

58. Policy T2 (Safeguarding of Existing and Potential Transport Routes) of the Fife SP requires a list of routes and land to be safeguarded from development that may prejudice their existing or future transportation use. This list includes the so-called “St Andrews public transport route”. We note, however, that no such route is shown on the Proposals Map.
59. Recalling that a route was shown on the corresponding map for the 2005 Draft LP, the Community Council deplores the negative approach of Fife Council on this matter. As climate change begins to bite the case for re-instatement of the rail link to St Andrews can only strengthen. Reducing carbon emissions implies providing a range of transportation options. It is clear that, for many residents and visitors, the relatively short distance from St Andrews to Leuchars forms a major psychological barrier to the use of public transport. Once residents have got in their cars they will often drive not just to Leuchars, but rather continue to their final destinations, be they in Edinburgh, Dundee, Glasgow or in England. The major potential benefit of a railhead in St Andrews is that such people are attracted back to public transport, thereby yielding reductions in carbon emissions over much longer journeys than the length of the rail link itself.
60. The need for the rail link has been further increased by the reckless strategy of the SP. The size of the town is to be increased by over 1000 houses by 2026, but no quantitative assessment has been made of the effect on the town centre of the consequential increase in vehicular traffic. For many years, traffic counts on the A91 have shown an inexorable increase in the numbers of vehicles, which rise by a percentage point or two each year. The historic centre of St Andrews is less and less able to cope with this influx, and gridlock occurs with increasing frequency, particularly on public holidays. It is obvious that the SP strategy will further exacerbate these problems. A range of approaches will be needed to address these ever worsening problems, and reinstatement of the rail link is certainly one important component.
61. We therefore call for the safeguarding of a route for a rail link along the southern side of the A91, broadly following the alignment that was proposed in 1999 in the FAST Rail Study, and linking to the existing line, with both northbound and southbound chords, in the vicinity of the Clayton caravan site.

Yours faithfully

Ian Goudie
Chair