

Royal Burgh of St Andrews Community Council

Agenda – February 2004

There will be a meeting of the community council at 7pm on Monday 2nd February in the Burgh Chambers of the Town Hall, Queen's Gardens. There will be a short break at about 8pm during which the 200 Club draw will be made.

(Copies of Agendas and Minutes of the Community Council are held at Fife Council's Local Office, St Mary's Place and the Town Library, Church Square. Those from mid-1998 on are online at <http://www.louisxiv.demon.co.uk/standrewscc/>)

NB There are a number of items carried forward from January 04 we were unable to consider due to the extended presentations and discussion of the 7th Golf Course. The actual agenda items have been included below. Please bring your January 2004 agenda and other papers circulated at that meeting for references to appendices etc.

1. Apologies

Sheila Black, Frank Riddell

2. Minutes of January 2004

Read for accuracy in matters of substance – harangue the secretary for minor errors (spelling etc) 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. Police report

3.2. A-Boards

Rachel Hay, Locality Assistant.

3.3. Iain Smith MSP

3.4. Local Plan

Bill Lindsay, Development Service.

4. Fife Councillors

4.1. Frances Melville (West)

4.2. Sheila Black (South)

4.3. Bill Sangster (Central)

4.4. Jane Ann Liston (South East)

5. Planning Committee

Appendix E: Presentation to Feddinch Departure Hearing

Appendix F: Objection to 7th Course (Final)

6. Matters Arising from previous meetings

6.1.-6.5. Carried forward from January

6.1. Homelessness

[December 3.2.] What response do we make to the presentation and briefing paper by John Mills of Housing Service? Jan. Appendix J.

6.2. Bus Services

[December 8.3.1.] Jan. Appendix A: response from Gary Moyes, Lead Officer (Travel Information) Transportation Service.

6.3. Bicycle Safety

[December 3.1.1.] Jan. Appendix B: letter by Frank Riddell.

6.4. Phone Boxes

[November 6.1.] An official reprieve has arrived for the boxes in the residential areas. Jan. Appendix C.

6.5. Bus Station

Jan. Appendix D: report from Ken Fraser

Update: We are invited to send representatives to a further meeting, 1.30pm Monday 1 March at Lower College Hall, to view two detailed layouts incorporating the key comments received.

6.6. Loches-en-Touraine

As requested in February 2003 the St Andrews-Loches Alliance present evidence of support by St Andrew organisations for formal twinning with Loches-en-Touraine. Appendix A.

6.7. Parking

Required on the agenda by November 2003 8.3.3.

6.8. 200 Club

Archie Strachan has handed over the Administrator rôle to Richard Douglas, effective from 1/1/2004.

7. New Business

7.1.-7.12. Carried forward from January

7.1. Saint Andrew's Day Holiday

Keith McCartney asks that we confirm our support for a St Andrew's Day holiday with His Eminence Cardinal O'Brien, Archbishop of St Andrews etc. and to the Saltire Society. Some correspondence in Jan. Appendix E.

7.2. East Fife Local Plan

Jan. Appendix F: Request for Community Council input to Local Plan consultation.

7.3. Sports Centre Advisory Group

We are invited to send a representative. Jan. Appendix G: letter.

7.4. Fife CCTV Advisory Group

Is to be disbanded due to lack of attendance at meetings in Glenrothes.

7.7. Volunteer Development Diary

Annual report 2003 comes in the form of a pocket diary for 2004. Is this of use to anyone?

January 'for information' or dealt with items

7.3a. Harbour Toilets covered in January 4.1.3.

7.5. Police Community Team newsletter.

7.6. What on Earth (Friends of the Earth Magazine).

7.8. Christmas etc Cards circulated at the January meeting.

7.9. Environmental Services Newsletter.

7.10. Water Customer Panels Report on Affordability of Water Charges.

7.11. Strandline Adopt-a-Beach newsletter.

7.12. Postwatch Scotland Newsletter.

7.13. Community Council Elections

Postponed until October 2004. Appendix B.

7.14. Links with Tabor, Czech Republic

Dr Paul Millar, Hon. Consul General, enquires about possible links between Tabor and St Andrews. Appendix C.

7.15. Connecting Communities Training

A two day course by Digital Inclusion Fife on what information and communication technologies can do for communities and community groups, plus some basic computer skills. Free to community groups, including community councils. 6th & 7th March at Kirkland Community College, Leven.

Names to Pete Lindsay

7.16. Dog Fouling

Environmental Services will be installing, as a trial, a dog waste bag dispenser at the East Sands (near the Sailing Club).

There will be a publicity campaign in March about the Dog Fouling (Scotland) Act 2003 coming into force, and enforcement should start in Fife in April after training.

8. Reports from Officers

8.1. Chair

8.1.1. Crawford Centre Letter and response. Appendix D.

8.2. Treasurer

8.3. Secretary

8.3.1. Greetings to Patras A recent Citizen "50 years ago today" column reported that St Andrews Town Council once sent a saltire flag to Patras. Do we wish to repeat this gesture for Mr Machie's visit [July 7.1.]?

9. Reports

9.1. From Committees**9.2. From Representatives****10. Any Other Competent Business**

Please notify Chair of AOCB items before the start of the meeting or at the break. Hint: Given that the end of the meeting is often taken in something of a rush, unless items are urgent it might be better to submit them for next meeting's New Business.

Appendix A – Loches-en-Touraine

Members will recall that the St Andrews-Loches Alliance was asked in February 2003 to return after it had ascertained whether or not there was a reasonable level of support for it to take the next step of asking Fife Council to apply for the Alliance to enter a formal twinning arrangement under the EU scheme with the Nouvelle Alliance in Loches. The StA-LA circulated letters to around 20 organisations and received 16 replies.

YES in favour of establishing a formal Twinning: **8**

Madras College
St Andrews Colts
Renaissance Group Choir
Madras College F.P.R.F.C.
Fife Council Museums
The St Rule Club
Balmashie Holiday Cottages
Rotary Club of St Andrews Kilrymont
One Fife Councillor also filled in a supporting slip.

NO: 1

St Andrews Merchants' Association

Other: 7

The University of St Andrews, St Leonards, Friends of the Botanic Garden, St Regulus Golf Club, and St Andrews Art Club preferred to leave it to individuals to decide support or otherwise. The Kingdom of Fife Tourist Board and the Rotary Club of St Andrews were unable to reply by the date requested. All remarks sent in are appended.

The St Andrews-Loches Alliance committee believes it has established a level of support considerably greater than that asked for a year ago. It now asks the Community Council to give its moral backing to the Alliance to approach Fife Council to ask it to apply for the St Andrews-Loches Alliance to enter the EU Town-Twinning Scheme with the Nouvelle Alliance of Loches-en-Touraine as its partner.

D.F.Macgregor (on behalf of the Committee)

Appendix: Comments**Madras College:**

'about time'

St Andrews Colts:

'St Andrews Colts enjoyed their week in Loches also hospitality from our hosts. Funding was our only reason for us not returning'.

Renaissance Group:

'On its visit to Loches in 1998 the Choir was generously received, and choir members appreciated the historic and cultural attractiveness of Loches and the surrounding area.'

University of St Andrews:

"The University of St Andrews is understandably not in a position to give you a positive institutional view on St Andrews-Loches Twinning by 30 October 2003. As you would expect, the view of a University population of staff and students in excess of 8000 individuals will always be mixed. I suspect, however, that the majority of our staff and students would welcome the significant relationship which has been developed between Loches and St Andrews and support its maintenance if it, in no sense, becomes so exclusive as to harm those international alliances that the University will itself continue to sponsor with places and institutions which are involved in activities which are unambiguously complementary to its own specific interests."

St Andrews Art Club:

"The Committee of the St. Andrews Art Club held a meeting on Monday 20th October to discuss the St. Andrews-Loches Twinning. After careful consideration they decided the following:-

1. That it was not within their remit as committee members of the St Andrews Art Club to decide on behalf of Art Club members as to whether or not St Andrews should twin with Loches.
2. That if the question of whether or not to twin with Loches was of particular interest to a club member then it was up to the member as to how he or she would make their views known to the St Andrews Loches Alliance.
3. That they wished to draw attention to paragraph 4 of your letter [indicating that many organisations contacted had in the past been involved in links with Loches in some way either here or in France]. St Andrews Art Club has never had any formal involvement with Loches. Any involvement has been purely by individual members on a private basis and not under the auspices of the St Andrews Art Club."

St Leonards:

"Thank you for your letter enquiring about the possibility of turning the informal arrangement with Loches into a regular twinning.

"St Leonards is very lucky, and most grateful for the connections which we have with Loches and we are very happy to continue with this excellent arrangement whether or not a formal twinning occurs."

Friends of the Botanic Garden:

"It was felt that support would really best be given by individuals. I am sure that any events happening in the Botanic Garden would continue to receive help from the Friends."

Kingdom of Fife Tourist Board:

"My Board does not meet again for another two months...and therefore I cannot give you an 'official' reply to your question..."

"However, what I can confirm is that we welcome any initiatives which lead to growth in inbound visitors to Fife; therefore, if achieving "official EU twinning" is a mechanism which allows you to access additional funds which will in turn result in additional visitors to St Andrews, then we would support your efforts."

Rotary Club of St Andrews Kilrymont has written to say that the majority of those present at a recent meeting backed the twinning of the town.

Appendix B – Community Council Elections 2004

From Iain L. Grant, Committee Manager (Environment & Development).

As you will be aware, Community Council elections are due to be held this year and it has been agreed that the elections will take place on 7th October, 2004. An earlier election in the year is not possible as staff involved in elections will require to undertake duties in connection with the European Parliamentary elections to be held on 10th June, 2004.

Existing members of Community Councils will retire on the day of the election for which I enclose a provisional timetable and I shall forward further details in due course. Any election which is contested will be conducted by way of postal ballot.

The Community Council Support Working Group which comprises members of Fife Council, members of Community Councils and officers is considering how the elections to Community Councils and the candidates who stand for election might be best promoted and if you have any ideas or suggestions on this topic, please let me know.

Community Council Timetable

ITEM TIMESCALE
Publication of Notice of Election. Not later than the 41st day before the day of election – Friday 20th August 2004.
Delivery of nomination papers. Not later than 4.00 p.m. on the 28th day before the day of election – Thursday 2nd September 2004.
Statement as to Persons Nominated. Not later than 4.00 p.m. on the 23rd day before the day of election – Tuesday 7th September 2004.
Delivery of Notice of Withdrawal. Not later than 4.00 p.m. on the 20th day before the day of election – Friday 10th September 2004.
Notice in case of uncontested election and Notice of Poll in contested election. Not later than the sixth day before the day of election – Friday 24th September 2004.
Polling. Thursday 7th October 2004.

Appendix C – Links with Tabor, Czech Republic

From Dr Paul Millar, Hon. Consul General at the Consulate General of the Czech Republic in Edinburgh

I wish to enquire about a possibility of establishing a special relationship (formerly twinning arrangement) between St Andrews and a town in the Czech Republic called Tabor.

You would familiar with the name Paul Craw, a Hussite reformist preacher who met with a gruesome end in St Andrews. His actual name was Pavel Kravar, and he came from Tabor, the centre of the Hussite religious reformation movement and the stronghold of Protestant faith in the Kingdom of Bohemia in Middle Ages. I feel that a time has come to establish somewhat more cordial links between Tabor and St Andrews. Your reply and opinion would be appreciated.

Appendix D – Crawford Centre

Letter from Donald Macgregor to James Boyle, Chairman, Scottish Arts Council:

The question of the Crawford Arts Centre and its continued core funding was discussed at the January meeting of the Royal Burgh of St Andrews Community Council. Great concern was expressed by our (elected) members at the possible threat to the essential core funding which the CAC requires and of which the Scottish Arts Council contribution is the largest part. We understand from the CAC that the prospect of project funding is not an alternative, since if core funding were withdrawn the Centre would be forced to close and there would be no projects.

The SAC should in our view be supporting both this visual arts centre and the performing arts centre (the Byre Theatre) in St Andrews, which is a significant and unique place as well as being one of Scotland's top half-dozen visitor centres. The work that the Crawford Arts Centre does in the community, for example

with Rymouth House and its residents, and in a wider, international sphere – the 2000 Emmanuel Lansyer exhibition from Loches-en-Touraine is an example – underlines the centrality of the CAC in the community.

What more appropriate function can there be for a Scottish Arts Council than to assist the development of community-based arts centres all over Scotland, not just in Edinburgh and Glasgow? I note from a Parliamentary Reply by the Minister for Tourism, Culture and Sport that in 2003-4 your Council will have invested £3.3m in developing the visual arts across Scotland. Don't stop!

Mr McAveety went on to give a 'concrete assurance' to Iain Smith MSP (North East Fife) that the Scottish Executive wished the visual arts to be prominent throughout Scotland and 'that any development by the Scottish Arts Council will need to reflect that agenda'. We in St Andrews cannot see how the withdrawal of funding and the closure of the Crawford Arts Centre would serve those ends.

The Scottish Arts Council recently gave the Crawford Arts Centre an Audience and Marketing Research grant of £18,000. One would assume that such an award indicates confidence in the Centre's future, but that confidence has, sadly, been undermined by more recent statements emanating from your organisation.

The Community Council has firmly supported the Crawford Arts Centre since its instigation and continues to do so. The Council has asked me to write to you in the hope that the Scottish Arts Council will reconsider its apparent decision.

Reply from James Boyle, Scottish Arts Council:

Thank you for your letter of 14 January regarding the Scottish Arts Council's funding of Crawford Arts Centre.

Council and officers appreciate the concerns of the organisation, its users and supporters, and any consideration of cuts to funding is never taken lightly. But as you will be aware Council has a responsibility to view our strategic and artistic priorities from a national perspective, and the consideration of Crawford's role, along with many other organisations, will be pursued in that context. We will of course seek the views of key partners including Fife Council and St Andrew's [sic] University in the process, and note comments from individuals such as yourself.

Appendix E – Feddinch Golf Proposal

Statement to Departure Hearing 29th January 2004 by Frank Riddell

The Royal Burgh of St Andrews Community Council applauded the Fife Council's East Area Development Committee for its principled refusal of planning permission to the Scooniehill development, which was subsequently supported by a Scottish Office Reporter.

To accept the current application would run contrary to the grounds for refusal cited in the Scooniehill application, which were supported by the Reporter for that public enquiry. Consistency in planning decisions is important if the public and developers are fully to appreciate where the rules lie. The main grounds for refusal of the Scooniehill application, as supported by the Reporter, are equally valid in this application:

The Scooniehill application was refused planning permission for the following reasons:

- (i) Proposed development is considered to be contrary to the terms of the development plan policies set out in both the Fife Structure Plan and the St Andrews Area Local Plan with particular regard to:
 - (a) development in the Countryside,
 - (b) development within a designated Area of Great Landscape Value,
 - (c) the loss of prime quality agricultural land, and
 - (d) key statements relating to the strategy for development in the St Andrews area and the protection of assets of importance to the tourist industry;
- (ii) The proposed development is considered to be premature pending the consideration by Fife Council in the current structure plan of a green belt for St Andrews;
- (iii) The proposed development would have an adverse effect on the Area of Great Landscape Value and would lead to a suburbanisation of the countryside;
- (iv) In the interests of road safety; the proposed development would generate an unacceptable level of traffic on the public roads and would lead to a harmful impact on the restricted road system within St Andrews;
- (v) In the interests of road safety; the development would generate an unacceptable level of construction traffic onto the public roads;
- (vi) The proposed development by reason of its size and position would have an adverse effect on the landscape setting of St Andrews;
- (vii) The proposed development, being a private golfing facility would be contrary to the council's Planning Guidelines for Golf Courses and Associated Developments in that there would be no pay-and-play element; and
- (viii) The proposed development would have an adverse effect on the environment.

During the course of the Inquiry, the Council acknowledged that reason for refusal (vii) was no longer applicable following the approval of an amended policy in the finalised Draft Fife Structure Plan.

In support of these reasons for objection the Reporter noted:

Para 59, "... I am not satisfied that these residential units require a countryside location and that it would not be possible for this use to be situated within an existing settlement. ... As indicated above the development of the golf courses does not provide a justification for these facilities being located in the

countryside. When these uses are considered on their own planning merits, I find that they do not accord with the terms of policies E12 in the structure plan or E13 in the local plan on development in the countryside. I am aware that the text of the local plan indicates that this policy may be over-riden in certain circumstances, but I am not persuaded that such exceptional treatment is warranted in this case.”

Para 60, “...This concern for the protection of the setting of the town is also set out in Policy E16 in the local plan. This states that within the designated AGLV the retention and enhancement of the existing landscape quality will be the overriding considerations in assessing proposals for development, which may be allowed under other policies in the local plan. In terms of these policies, the appeal site lies predominantly within the AGLV...”

Para 65, “...At present, the area has a pleasant rural and agricultural appearance, which is characterised by the presence of a number of large arable fields. Under your client’s proposal it would take on a more manicured and ‘artificial’ appearance. While I would accept that the question of whether the existing or proposed land uses is more attractive is a matter for subjective judgement, the changes would clearly alter the appearance and character of this area. I note that Policy E16 in the local plan states that within the AGLV the retention and enhancement of the existing landscape quality will be the overriding consideration. In these circumstances, I consider that the replacement of the farmland with golf courses would change the existing landscape quality of the AGLV and I am not persuaded that such a change would necessarily be beneficial. ... In summary, with regard to Policies E11 in the structure plan and E16 in the local plan, I find that the proposed development, taken as a whole, would have a detrimental effect on the landscape quality of the AGLV.”

Para 67. “On the second determining issue, the finalised draft Fife Structure Plan, ... contains a number of policies which are relevant to the determination of this application. (note that these are now in the approved Structure Plan). I note that the policies in the draft plan relating to the promotion of tourism, development within the AGLV, the loss of prime quality land and development in the countryside remain broadly similar to those in the approved plan. For the reasons set out in the preceding paragraphs I do not consider that your client’s proposal accords with these policies. The most significant policy change in the draft plan relates to the intention to designate a green belt around St Andrews. I note that the concept of designating a green belt was also put forward in the conclusions of the St Andrews Strategic Study (1998). The draft plan’s position on the matter is set out in Policy SS7, which indicates that there will be a presumption against all development in the green belt where there is intervisibility between the site and the town’s historic core unless it would result in the enhancement of existing views or in no material alteration to them. While I recognise that this policy has to be considered and approved by Scottish Ministers and the detailed boundaries would have to be defined in a subsequent local plan, given my conclusion on the effect of the proposal on the visual amenity and setting of the town, I do not consider that any support for your client’s proposal can be drawn from this policy. Consequently, I conclude that neither the St Andrews Strategic Study (1998), nor the draft structure plan provide any justification for treating the proposal as an exception to the provisions of the development plan.”

Para 69. “I am aware that your client has submitted that the proposed development would assist with the promotion of tourism and the improvement of golf facilities in the area. I also appreciate that because of these benefits you submit that the proposal is supportive of a number of the tourist initiatives being promoted by various bodies, which are designed to increase the number of jobs and generate additional income for the local economy. I can see the logic of such an approach, and would wish whenever possible to support initiatives that provide additional employment. However, I do not consider that it would be in the long-term interests of the local community or the tourist economy to allow a development to proceed, which has significant implications for the landscape setting of the town and would erode the amenity of the area. In this context, the importance of the setting of St Andrews and its effect on the character of the historic burgh has been widely recognised. The high amenity of the area and its sensitivity to development were also emphasised by the then Secretary of State in his approval of the Fife Structure Plan in 1994 and in the council’s St Andrews Strategic Study (1998). Furthermore, although the provision of local employment and the possibility of assisting with the diversification of agriculture are important matters, I am not convinced that the present proposal offers the only or the most appropriate way of achieving these objectives. I also note that the benefit of the development to the local residents is restricted by the fact that this is to be a private club. Neither am I persuaded that the development would materially assist in lengthening the tourist season as it is to be marketed primarily for use during the peak summer months. In these circumstances, and given my concerns regarding the proposed scale of the development in a countryside location and its visual impact, I do not consider that the likely economic or social benefits to the community would outweigh the disadvantages arising from the development.”

Section 11.2 of the associated VIA describes Visual Receptors. They include ‘users of recreational landscapes including public rights of way and bridleways, whose attention or interest may be focussed on the landscape.’ There is little to suggest, in the visual impact assessment presented by “experts”, that it was prepared other than in a fast moving car on the main roads surrounding St Andrews. No attention has been paid to the many local recreational users of rights of way or bridleways. If one walks up the officially signposted right of way from Bogward Road to Lumbo Farmhouse, as many people do, a great deal of the proposed Feddinch site is visible from this path. You can see the Feddinch Mansion house and all the fields between it and Lumbo. The view of Feddinch from here is far more extensive than that from the roads. If the area around Feddinch were to be turned into a golf course, the view from this right of way would be nothing other than that of golf courses. This is completely contrary to the expressed opinion of the Reporter regarding landscape changes.

Let us have some consistency in planning matters concerning St Andrews. The Royal Burgh of St Andrews Community Council urges you, the East Area Committee, to follow the courageous precedent set by your predecessors for a very similar application – a rejection that was strongly supported by a Scottish Office Reporter. This application has no merits for St Andrews as clearly expressed above. You should reject this application, which will have a detrimental effect on the landscape setting and amenity of our glorious, beautiful and historic Royal Burgh.

Appendix F – 7th Links Trust Golf Course (Final)

By Ian Goudie and Donald Macgregor, following January 2004 meeting of community council, to Development Service.

Proposed Golf Course, Kinkell and Brownhills Farms, St Andrews.

1. I write on behalf of the Community Council to object to the above application. We would also wish to draw your attention to a number of serious shortcomings in the associated Environmental Statement (ES), and to indicate a number of issues on which further investigation or clarification is needed.

Summary

2. Our major points include:-

(i) The implication of the Fife Structure Plan is that this application for probable Green Belt land should be deemed premature. To do otherwise would set a very dangerous precedent for the town.

(ii) The proposal does not comply with Structure Plan Policy N7 on Development on the Undeveloped Coast.

(iii) The applicants' case for a new course is an amalgam of statistical and legal arguments, but neither of these strands is pursued with sufficient precision to be persuasive.

(iv) The methodology used to assess the numbers of vehicle trips which would be generated by the proposed development is unsound. The predicted figures are likely to be serious underestimates. One can therefore have no confidence in the conclusion that a full Traffic Impact Assessment (TIA) is not required.

Unsurprisingly, on a matter as controversial as this, the Community Council does not have a unanimous view. The Council agreed to submit this objection after each of the four main points listed above had been accepted by a clear majority.

The broad picture

3. Although we find less than convincing the arguments which purport to establish the need for a seventh course run by the SLT (St Andrews Links Trust), the main concern of the Community Council with this application is over the chosen site. Indeed, although the boundaries of the Green Belt (GB) for St Andrews are yet to be determined, para 3.4.2 acknowledges that "The most likely scenario however is that the site will be within the GB". Throughout its existence the Community Council has been a jealous guardian of the reputation of St Andrews as "The Home of Golf". We are also, however, conscious of the need to maintain our perspective and to safeguard the well-being of the town as a whole. The beauty of the landscape setting of the town is a key element of that well-being. It is a cornerstone of the tourist industry, and by no means an insignificant factor in attracting students to the University of St Andrews, which remains by far our principal source of employment.

Threats to likely Green Belt land

4. The strength of support in St Andrews for the concept of the Green Belt needs no underlining, but we appreciate that it will take some years to get the Green Belt boundaries into place. The landscape setting of the town is under considerable threat in the intervening period. The outcome of the recent planning enquiry implies the sad loss of the hillside above John Knox Road, and further encroachment into land which we would wish to see in the Green Belt may come not only from the present application, but also from the proposed golfing development at Feddinch, the proposed Clash Wood chalet development, the proposed hospital and healthcare centre and the enormous proposed Western development.

Prematurity considerations

Processing applications for Green Belt land

5. Accordingly there was a warm welcome for Policy SS8 of the July 2002 Fife Structure Plan, which requires the Local Plan to identify Green Belt boundaries for St Andrews, and indicates that "development proposals likely to prejudice this process will be considered premature". This operational procedure was reaffirmed by the unequivocal statement, reported in The Courier of 12 December 2002, by the former Head of Planning, Mr David Rae, that "development proposals submitted for St Andrews in advance of green belt boundaries being drawn up will be regarded by Fife Council as "premature".

6. The principle of the prematurity of proposed developments in the Green Belt is thus central to the protection of the landscape setting of the town until the Green Belt boundaries are determined in the Local Plan. Where major applications are concerned, to permit the creation of any category which is deemed exempt from the prematurity clause would clearly be misguided, and would set a precedent which would be liable to undermine the clear intention of this part of the Structure Plan.

The Undeveloped Coast

7. Our objection to the proposed site is that not only is it within probable Green Belt land but also that it is on the undeveloped coast, which this Community Council has always been keen to protect. Its use would be in clear breach of Structure Plan Policy N7 on Development on the Undeveloped Coast, which indicates that such developments will only be permitted if three conditions are met. The proposal fails to satisfy two of these conditions, in that it cannot be said to contribute to "renewal and regeneration", and it neither demonstrates "a need for a coastal location" nor is it "required for a coastal activity".

Filling the gaps in the ES

8. We have previously highlighted the comment in PAN 58 (Para 25) that the Environmental Impact Assessment (EIA) process "rarely proceeds in a simple linear fashion", and we believe that Fife Council should seek clarification of parts of the present ES. For, despite its size, this ES leaves some important questions unanswered, whilst in other places the submitted material raises more questions than it answers. We recall that the letter from the Planning Division of the SEDD to all Heads of Scottish Planning Authorities (ref PGD/5/12) says in para 19.1 "The planning authority should be prepared to challenge the findings of the ES if it believes they are not adequately supported by scientific evidence."

Is a seventh course needed?**Inconsistencies between the ES and the NTS**

9. The importance of challenging unsubstantiated claims is relevant, in particular, to the justification given for the development of a 7th course. On the statistical part of this case, Fife Council should initially seek clarification of the submitted data. One concern lies in the inconsistencies between the data in the full ES and that in the Non-Technical Summary (NTS). The comparison is not aided by the poor proof-reading of section 4.8 of the ES on Economic Impact, where it appears the data of Table 1 should have formed a 4 x 6 table rather than a single column. Once reconstructed, it emerges that the waiting list numbers for three of the five categories of sales differ from those in the NTS. Two of the percentage increases are somewhat understated due to use of incorrect denominators. The NTS also includes further data on yearly tickets for R&A members with no comment on the relationship of these data to the analysis in the ES.

The need for a longer perspective

10. More importantly, Fife Council should also seek more comprehensive data covering a significantly longer timespan. Bearing in mind the dates of recent Open Championships, the starting points for the time series data appear to have been chosen to maximise the apparent growth in golfing activity in St Andrews over the last few years. Different starting points are chosen for the series on rounds played and those on ticket sales. The reader of the ES is left with the strong suspicion that the growth would look much less spectacular if viewed against a longer perspective and a common base year. It should also be noted that part of the increase on the ticket sales is attributable to the policy change, with the introduction of sales of Open Links Tickets.

Long term implications of claimed increases

11. Para. 3.2.1 of the ES says “between 1995 and 2002 total rounds played on SLT courses has increased from 168,200 to 211,000. An increase of 25% in total rounds played. There is no indication to suggest that such growth will not continue”. If this is correct and such an increase is typical, the long-term position is not sustainable. If overall demand continues to increase at 25% every seven years, then by 2016, twice the capacity of 1995 will be needed to cater for it. If demand from local golf club members living outwith North East Fife continues to increase at 60% every four years, it will by 2018 have exploded to ten times its volume in 1998. Manifestly the town cannot cope with expansion on this scale.

Transferability of demand

12. Section 3.0 of the NTS reports that “As a consequence of the Links Act, SLT must provide access to the Links to any resident of St Andrews”. Para. 3.2.3 of the ES says of the proposed new course that “In terms of the Links Act, this course will form part of the links”. It is, however, important, if a case is being made for the 7th course, to establish that local demand is indeed transferable from the present links to the proposed new course at Kinkell Braes. The ES advances no data to substantiate such a proposition. The extent to which local golfers would be prepared to make such a move should be investigated and quantified.

Which constraints are absolute?

13. If Fife Council is persuaded of the increased demand, it should still consider whether provision of a new course is the appropriate response. Despite the lack of any seasonal disaggregation in the submitted demand data, the capacity problem on the links is a phenomenon restricted to the summer months. Clearly the SLT has decided that demand is transferable to a new course, but not transferable to the “shoulder months” of the year. The SLT has to operate within many constraints, but the Council should consider whether those constraints are indeed absolute or whether there is any way of achieving sensible solutions involving joint venture or the purchase of starting times on under-utilised private courses. For it is evident that the SLT has no immediate prospect of satisfying the requirement of Policy C4 of the Structure Plan that proposals for new golf courses must “demonstrate that the demand cannot be met on an existing course in the area”. The validity of its claim for effective exemption from this clause on legal grounds must therefore be examined.

Alternative sites**Strathtyrum and Easter Kincaple**

14. The consideration of alternative sites in the ES is also inadequate. It is clear that the applicants have not noted question 2.5 in the EIS Review checklist in the EU’s Guidance on EIA, which reads “Are the main environmental effects of the alternatives compared with those of the proposed Project?” Section 3.3 of the ES implies that the alternative which looked most viable to the SLT was the one which used part of the Strathtyrum Estate combined with land at Easter Kincaple Farm. The environmental effects of this alternative are not considered at all. The reasons given for the option being “unworkable” are firstly that “the course would be somewhat ordinary” and secondly that “the Strathtyrum proprietor was still keen that that any arrangement should become a joint venture”. On the latter point we note that the ES does not report reaching a complete impasse with Strathtyrum Estate. Indeed, in the discussion of a possible site solely on Strathtyrum land, it is recorded that the Estate “was prepared to consider the construction of a golf course on part of the Strathtyrum land” and that “while they might consider a lease, (Strathtyrum) indicated that on balance they would prefer some form of joint venture”. Although short-term problems regarding the prematurity of applications for probable Green Belt land would also apply to Strathtyrum, the apparent willingness of the Estate to discuss the matter should be welcomed. For, if Fife Council could secure an answer to the EU’s question on environmental effects, we think it likely that any objective assessment would deem a Strathtyrum site as less damaging to the environment than one at Kinkell Braes.

Hillside locations

15. In assessing possible alternatives at Scooniehill and Feddinch, the ES does make a brief attempt to address environmental issues. Indeed, para. 3.3.4 of the ES candidly records that these sites were discarded “as they were already the subject of contractual arrangements with third parties and because (in the case of the Scooniehill site) the reporter at a recent planning appeal had determined that a golf

course on a hillside site at present in permanent pasture and overlooking St Andrews was not an appropriate location for a new golf course.” There is, however, no discussion of the extent to which the reporter’s verdict might also apply to the Kinkell Braes site. The impact on the landscape would, of course, be much greater than that of the course alone, due to the inclusion of a large maintenance building and a restaurant. The proposed site for the latter is determined more by commercial considerations than environmental ones.

Traffic Impact

The use of TRICS

16. Another inadequate part of the ES is the TIA, which is presented with an inappropriate brevity. Of particular concern is the methodology used to assess trip generation. The consultants Faber Maunsell choose to rely solely on the TRICS (Trip Rate Information Computer System) database, the intention being to obtain comparable data from similar golf courses elsewhere. An appendix indicates that the data are drawn from private golf courses in East Sussex (8 days), Hertfordshire (1 day), Kent (1 day), Dorset (10 days), West Midlands (2 days) and Greater Manchester (5 days). It also lists the selected survey days. No justification is offered for any of these selections. On the basis of these data, arrivals and departures are predicted for a full 24 hour period.

Relevance and robustness

17. The extent to which the selected data is suitable for predicting trip generation by the proposed new course is clearly highly questionable. At the most basic of levels, it should be noted that golf is not a game played at night, and that during the time of greatest demand – the summer months – St Andrews enjoys considerably more daylight than the southern English counties which form so large a part of the sample. The question of how the sample data should be summarised also merits attention. The IHT guidelines leave a lot to be desired as regards statistical methodology, but they do comment (para 3.4.17) that “it is recommended that developers and highway authorities adopt a robust forecast i.e. a value higher than the average. An approach that is currently widespread is to consider a range of values with the higher value being the 85th percentile of the data sample (i.e. the trip rate exceeded by only 15% of the sample) and the lower value being reflected by the average trip rate.”

Trip generation for multi-purpose sites

18. Another very fundamental error here is the failure to recognise the multi-purpose nature of the proposed development. What is proposed is not simply an 18 hole golf course, but also a practice area, a 40 seat restaurant and (as per para. 3.2.3 of the ES) a public park. Para. 3.4.7 of the guidelines of the Institution of Highways and Transportation (IHT) says “When multi-purpose sites are being considered, details of each element should be provided and the appropriate trip attraction rates for each element separately should be used as a first estimate.” Fife Council should certainly insist that this is done.

Failure to validate the TRICS output

19. In discussing in para 3.4.4 the use of the national databases (of which TRICS is one), the IHT guidelines say “It should be emphasised that this data is an aid to and not a substitute for professional judgement”. In contrast the approach of the Faber Maunsell TIA is purely mechanistic: the TRICS output appears to have been merely accepted with no attempt at any form of external validation.

More accurate ways to predict trip generation

20. It is clear that a professional approach here to trip generation would not place complete reliance on comparability data of doubtful relevance, but would seek a more balanced view by contrasting it with survey data and with the results of what the IHT call calculation from “first principles”. To predict trip generation by the main users of the facility – the golfers – there is no need to use data from private English courses when the SLT run six other courses in the town on which data could be collected. Usage of the practice area could be tackled in a similar manner. First principles calculations could be used to forecast trip generation by the other users of the development – other restaurant customers, greenkeepers, clubhouse and restaurant staff, service vehicles, those using the site as a public park etc.

Probable underestimation of the trips generated

21. The implication of this discussion is that the brief TIA submitted by the developers is not an adequate basis for decision-making and that Fife Council should seek a full TIA, with trip generation estimates based on more locally relevant data. The consultants Faber Maunsell argue in para. 5.2 that a full TIA is not necessary under the guidelines of the IHT as they believe the newly generated traffic would not exceed 10% of the existing two-way flow. Table 5.1 displays increases varying between 5% and 8%.

22. In fact the high level of uncertainty attached to these estimates implies that they offer no valid statistical evidence that the increases in traffic would be less than 10%. The combined effect of the failure to use suitable comparability data, the failure to note the multi-purpose nature of the development and the failure to use the robust estimation methods sought by the IHT is so great that the tabulated figures are likely to be serious underestimates of the true values. The IHT Guidelines (para 2.4.2) say “Like the Environmental Statements it is considered that the TIA should be written as an impartial assessment of the traffic impacts of a scheme and it should not be seen to be a “best case” promotion of the development.”

Sensitive locations

23. Faber Maunsell have also been selective in quoting para 3.1.5 of the IHT Guidelines which indicates when “a TIA should normally be produced.” The first bullet point that follows gives the 10% criterion that Faber Maunsell have quoted. The second reads “traffic to and from the development exceeds 5% of the existing two-way traffic flow on the adjoining highway, where traffic congestion exists or will exist within the assessment period or in other sensitive locations”. The Kinkell Braes site is indeed a “sensitive location” for the obvious reason that most of the traffic to it will come through St Andrews, which in the crucial summer months is already at its traffic capacity for a large proportion of the time.

National recognition of the unsuitability of the percentage criterion

24. The other important aspect of the 5% criterion for sensitive locations is that it represents the first glimmer of recognition by the IHT of the essential stupidity of the percentage increase criterion. The

criterion implies that the greater the level of existing traffic the more acceptable it is to add still more from new developments. So naive application of the rules triggers a full TIA when the loading on a lightly used rural road increases from 20 to 23 vehicles an hour, but an increase of 50 vehicles an hour may not trigger one if the current loading exceeds 500 vehicles an hour and will not do so if the current loading exceeds 1000 vehicles an hour. It is pleasing that the Scottish Executive has recently highlighted this fundamental flaw in its Guide to Transport Assessment in Scotland. Considerations of road and junction capacity are always likely to be more pertinent, and this is particularly so in the St Andrews context. We would urge Fife Council to recognise that it should not allow the developers to dispense with a full TIA on the basis of a frail analysis relying on a flawed and outmoded criterion.

Trip Distribution

25. In view of the unreliability of the total trip generation statistics, the consequential calculations are clearly built on sand, and it might be thought that there is little point in considering them until they are corrected. As they stand, however, they are indicative of the level of thought that has gone into this TIA. There is absolutely no reason why the proportions of arrivals and departures at the site travelling in northerly or southerly directions should follow the proportions of existing traffic flows. During the morning peak most existing traffic on the A917 is heading for St Andrews, as the local focus of employment, but to deduce that most users of the golf course would be arriving from the direction of Boarhills is simply silly.

Green measures

26. This Community Council remains keen to encourage greener forms of transport, but we are sufficiently realistic to appreciate that their proportionate contribution is likely to be small in the short term. In the case of other recent developments in the area, our predictions of the total effect of green travel plans have been closer to reality than many of the professionals. In the case of the present application, we would welcome the provision of facilities for walkers, cyclists and public transport users, but for the foreseeable future such users would only represent a tiny fraction of the modal split. Para 2.3 of the report candidly recognises that cycling is “unlikely to be a popular form of transport for golfers”. Even the young are likely to be reluctant to cycle up the hill with a bag of clubs.

Road safety

27. This brief TIA restricts consideration of road safety to the site access itself. The proposed development would, however, add significantly to the dangers at the junction of the Crail and Anstruther roads (A917 and B9131). In particular it would significantly increase the volume of right-turning traffic emerging in a northerly direction from the Anstruther road. Redesign of the junction to cater for this increased flow would be necessary.

Economic Impact

Effects on other businesses

28. There is also a need for a fuller and more objective Economic Impact Assessment than that which is included in the present ES. Section 4.8 of the ES is relatively brief and appears designed to promote the application. In particular, para. 3.6 of section 4.8 asserts with minimal justification that “The creation of a new course by the Trust should benefit most relevant businesses both in St Andrews and in the surrounding area”. A fuller analysis is required, covering, in particular, the effects on the under-utilised private golf courses in the area, and on local restaurants. The present Links Clubhouse is already seen by some as having a negative impact on town centre restaurants: a new restaurant exploiting the Kinkell Braes setting could well exacerbate this effect. An objective analysis would be helpful.

Correspondence

Date	from	subject
07/01/2004	Royal Mail	Single Daily Delivery
12/01/2004	Fife Environmental Trust	Funding Update newsletter 2003
12/01/2004	Police	Community Team Newsletter Jan 04
12/01/2004	Sarah Wilson	Overseas placement - progress rept
13/01/2004	NHS Fife	Board meeting Dunfermline 27/1
13/01/2004	East Area Services	Meeting cancelled 16/1
21/01/2004	Glasdon	Street furniture newsletter
21/01/2004	Water Customer Consultation Panels	Upcoming Consultations
26/01/2004	Law and Administration	Community Council Elections
30/01/2004	Steven McColl	Thanks re harbour toilets
30/01/2004	Transportation Services	Bus Station Development
31/01/2004	Community Services	Connecting Communities Training
31/01/2004	NHS Fife	Public Involvement Strategy Group
31/01/2004	Environmental Services	Dog Fouling: bag dispensers