



THE ROYAL BURGH OF ST ANDREWS COMMUNITY COUNCIL

Statement for Local Plan Hearing 4/10/11

As the views of St Andrews have been consistently ignored by Fife Council over the six year gestation period of the Local Plan, we welcome the opportunity to present them at a Public Hearing. The huge task before it and the mountainous documentation speak volumes about the abject failure of Fife Council to engage in any meaningful way with the local community. We are fully aware that the hearing starts not with a blank canvas but with one that already bears the harsh outlines of the ill-judged Fife Structure Plan 2009. It is, to say the least, unfortunate that the Local Plan (LP) must conform to a document with foundations that have already been undermined by the recession. Despite our experiences of recent years, we retain our belief in democracy and the importance of popular input, and hope that a prime goal of the hearing will be to identify a planning strategy for St Andrews that conforms to both the wishes of local people and to the required constraints of the Structure Plan.

1. Structure Plan requirements for St Andrews West SLA

1(a) Protection of high quality landscape setting

The only way in which the landscape setting of this town can be protected is by locating on the relatively low-lying land of the Kinness valley such parts of the SLA as need to be on greenfield land. The residents of St Andrews have made it abundantly clear over the years that they do not want development between the Strathkinness High Road and the A91, nor between the High Road and the Low Road. Development here would be highly visible and would destroy the iconic view of the town, treasured for centuries, from the traditional pilgrim route. We regard so-called mitigation measures as a smokescreen: they are not worth the paper on which they are written.

1(b) Minimum 1000 houses to 2026 (Large proportion to west of town, maximise brownfield land)

Noting 1(c) below, we believe that the total allocation until 2026 for St Andrews West should be 1060. In view of the SP phasing arrangements, the Community Council objection para. 10 (CC§10) indicated that 570 of these should be scheduled before 2018.

The 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 cannot both be met within the LP period to 2018. They can, however, be substantially satisfied by 2026. In conformity to SPP§80, the priority should be to utilise the brownfield capacity. CC§14 indicated that 380 of the strategic allocation of 570 units in the period to 2018 could be on brownfield or infill land, implying that 190 units should be assigned to the SLA to the west of the town for the period to 2018, and the remaining 490 units specified under SP Proposals PH1 and PH3 for the period 2018-26.

In fact the numbers required to the west of the town can be further reduced, as the new Madras College will vacate brownfield land for between 40 and 240 units (cf. 3(a)).

1(c) Up to 90 additional houses following further assessment

CC§9 supports a division of these 90 units between the St Andrews West and the East Neuk settlements SLAs proportional to the main allocations to these SLAs, implying 60 of them are allocated to the former.

1(d) 10 hectare science park

We object to the choice of Langlands for this park. The Preservation Trust's suggestion that the science park be located on the site of the former paper mill at Guardbridge may well be the optimal

solution if that can be deemed to meet the SP requirement. The relative isolation of St Andrews has been one reason why the previous high-tech sites have not got off the ground. The Guardbridge site is much closer to the railhead at Leuchars.

The next best alternative is the 6.77 ha. OPP5 Strathtyrum high amenity site, which CC§36 proposed retaining as a business site. Further thought suggests that it is preferable to make it the science park (augmented, if required, by a further 3.23 ha. in the Kinness valley). This would locate it alongside the A91 and close to the Science Schools on the North Haugh.

CC§33 also noted further possibilities in the Kinness valley, namely the 10 ha. business site e11 of the 2005 Draft Plan or part of the 10.68 ha. site labelled h79 in that Plan.

1(e) 10 hectare business park

We are strongly opposed to use of the STA 05 Pipelands site. In our view, the pertinent sites are those in our ordered list in 1(d) above. OPP5 is our first preference, or if that becomes the science park, then e11 or part of h79 should be used. For either of the Kinness valley sites, the LP should require substantial screening (e.g. conifer belt) from the adjacent housing and impose permanent noise and access conditions.

1(f) Link road

We are opposed to the proposed portion between the Strathkinness Low Rd and the A91. As noted in 1(a), development in that area would cause irreparable environmental damage, and we cannot therefore support a road to facilitate it. The need for such a road has not been established. It is well-known that new road capacity generates new traffic growth, contradicting the governmental aim of reducing carbon emissions. Bogward Road, Canongate, John Knox Road and the High Road would all become much more dangerous.

The Structure Plan defines neither the location of the link road, 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.

1(g) Primary school

1(h) Contribution to secondary school

The need to reserve a site for a primary school and the justification for developer contributions towards a secondary school both rest on the housing provided being at a price that families can afford. Even the years since the 30% affordable policy was introduced suggest that in practice the vast majority of new housing will have few child occupants.

1(i) Park and ride

CC§21 indicated that we would oppose any proposal for a park and ride site that put an obstacle in the way of a possible rail link.

2. Boundaries of STA 01/western and south-western part of inner green belt (GB)

2(a) Exclusion of Strathtyrum (OPP5) from STA 01

As indicated under 1(d) above, we support the retention of this site either as a business site or preferably a science park. We therefore wish it to be inside the inner GB boundary.

2(b) North Haugh (park and ride, Madras College?)

The proposal to build Madras College on the North Haugh was abandoned about two years ago. See 1(i) re park-and-ride.

2(c) Langlands

If, as is currently thought, the proposal to build Madras College at Langlands has also been abandoned, we wish the inner GB boundary to be drawn as tightly as possible at this point. CC§47

proposed following the path from David Russell Apartments to Andrew Melville Hall to the top of the raised beach.

2(d) West of Northbank Farm

We regard this as an entirely unsuitable site for development of any kind. It should certainly be included in the GB.

2(e) Headon Developments (HD) representation

It follows from 2(c), 2(d) and 2(f) below that we are completely opposed to any proposals to further relax the inner green belt boundary north of the Strathkinness Low Road. We also oppose HD's omission of land in the Kinness valley.

2(f) Between Strathkinness High and Low Roads

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. The inner GB boundary should abut the existing housing.

2(g) Between Strathkinness Low Road and Craigtoun Road

To the limited extent to which greenfield development is essential in order to meet Structure Plan requirements, the Kinness valley is the town's preferred location.

2(h) To the south east of Craigtoun Road

Noting our comments under 1(d) and 1(e), we would draw the inner GB boundary to the south of site h79.

2(i) Area proposed by Macdonald Estates (ME) and Mount Melville Ltd

Of the proposals from major developers, we regard the one from ME as the least damaging to the environment of the town. As indicated under 3(d)(i) below, we cannot support development as far as Lovers' Lane: the inner GB boundary to the north of the Craigtoun Road should be drawn at the 60 metre contour.

2(j) STA 05 to east of hospital

2(k) Area proposed at Pipelands in Muir Group's representation

The "green bowl" is a key element of the landscape setting of the town and it must be preserved. We therefore object strongly to the proposed development of any part of the southern hillside of the town, whether it be for business or industrial use or for housing. The Community Council wishes all the undeveloped southern hillside to be included within the GB. Our preferred sites for employment use are given under 1(d) and 1(e) above.

3. Miscellaneous issues

3(a) Inclusion of existing Madras College sites in STA 01

Our objection proposed maximising the use of brownfield land. We therefore support inclusion of the Kilrymont Road site in STA01 to cover the possibility that Fife Council decides not to use it for the new Madras College. A discontinuation of the use of the South Street site still looks probable, and we support the inclusion in STA01 of the southern part of the site (excluding the open space and the historic buildings at the northern end).

3(b) Employment or housing use at Craigtoun

The implication of 1(d) and 1(e) above is that, if the Guardbridge site is not used for the science park (or indeed as a business site), there will be a need for an employment site at Craigtoun, if more environmentally damaging sites are to be avoided.

3(c) Retail provision at Craigtoun Road

We have long argued for a neighbourhood shop in the vicinity of the Craigtoun Rd. (CC§19)

3(d) FC Planning Committee decisions 7 September 2009

3(d)(i) Restrict development to 45 metre contour at Craigtoun

In identifying land for housing, brownfield land should be exhausted first. Thereafter using the land below 40 metres at Craigtoun will cause less environmental damage than any other greenfield land around the town. That said, we do not, however, regard a solely contour-based approach as appropriate. Our acceptance of site h79 (see 1(d) above) implies a willingness to risk development over 60 metres at Craigtoun, albeit in the knowledge that history suggests that the probability that employment sites in St Andrews will be used is low. It is also the case that existing housing at Bogward goes over 50 metres. If broad directions for housing development beyond 2018 are required, the next least damaging options are those between 40 metres and 60 metres at Craigtoun. The visual impact of this land is much less than that north of the High Road or that between the High Road and the Low Road.

3(d) (ii) Relocate cemetery site to west of link road

CC§45 indicated that our preferred options for the extension are the upper part of the site to the south of the existing cemetery and the eastern portion of the site labelled h81 in the 2005 Draft LP.

4. St Andrews West Development Framework

4(c) Council Recommended Change 40b.1

See 3(d).

4(d) Recommendations in Alison Grant study of 2009

We do not view this report as objective science. It is at variance with earlier work by the same author, and appears to be an attempt to substantiate the client's pre-chosen conclusions. Failing to inject basic common sense, it is much too lax in what it permits north of the Low Road, whilst being unnecessarily restrictive in the Kinness valley.